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Edited by Maarten Keune, AIAS-HSI, University of Amsterdam

Social dialogue and non-standard workers: a literature review



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1 Introduction

Maarten Keune, AIAS-HSI, University of Amsterdam

This paper presents a broad literature review concerning the subject of non-standard work and social dialogue. Non-standard work here refers to all work that does not correspond to standard employment, that is guaranteed fulltime and open-ended subordinate employment. Non-standard work has been on the rise across Europe in recent decades with the growing use of temporary contracts, zero hour and on-call contracts, temporary agency work, marginal parttime work, self-employment, platform work and other types of work that are not full-time and on permanent contracts. Non-standard workers often, but not always have low quality jobs, in terms of pay, job and employment security, social protection, working conditions, training and growth opportunities. Often therefore they are referred to as precarious workers however, not all non-standard workers are precarious, and not all precarious workers are non-standard workers. Still, there is a strong overlap between the two categories. As such, non-standard work has become a serious concern.

The growth of non-standard work as well as its quality is not an inevitable outcome of 'neutral' economic and technological developments, but to an important extent of conflicts, choices and power in the political sphere and in labour relations. In the political sphere it matters what type of social and labour regulations prevail, what type of employment relations they allow for, and what rights and protections they confer on non-standard workers. In labour relations the interests and ideas of workers and employers matter, as well as the choices they make (e.g. to create non-standard jobs or not, to become self-employed or not), the extent to which they are represented by employers' organizations, trade unions or other collective organizations, and their access to power resources.

[The Integrating Diversity in Social Dialogue project](#) (INDI) focuses on non-standard work from the perspective of social dialogue. Following the definitions of the International Labour Organisation (ILO) and EU, social dialogue here encompassing all types of negotiation, consultation, participation and information exchange between, or among, representatives of governments, employers and workers, on issues of common interest relating to economic, employment and social policy. Social dialogue in its various forms can be a key mechanism for improving working conditions, enabling access to social protection, empowering workers to voice their concerns, and bolstering employer competitiveness. It can be particularly important to protect workers and facilitate organizational adjustment in times of profound change, like during the ongoing green and digital transitions. Social dialogue does not always cater to the interests of non-standard workers, however. Non-standard workers often find themselves at the periphery of social dialogue processes and benefit only scarcely from the outcomes. As a result, they are often left without the protections and benefits ensured by statutory regulations and collective agreements. The extent to which this is the case however differs across countries and business models.

The IN-DI project studies the extent to and the way in which existing and emerging social dialogue processes and structures integrate the interests of non-standard workers, and what options exist to make social dialogue more inclusive to and beneficial for non-standard workers. The present literature review forms the initial step in IN-DI's research, reviewing how these questions have been discussed in the literature. Most of this literature review qualifies as expert review, synthesising the most important and relevant literature on the subject, and working towards the identification of promising directions for new research. The exception is chapter 7 on alternative forms of representation, which includes a scoping review as the subject is less systematically discussed in the literature. The review consists of seven chapters.

Chapter 2 addresses the agency of non-standard, precarious workers and the strategies and tactics they devise to deal with their work situation. Chapter 3 discusses why workers should participate in decision-making processes, how such participation can unfold, and what we know about democracy and participation among different groups of workers, including workers in non-standard work. Chapter 4 discusses the different industrial relations regimes and employment regimes in Europe and how they affect (various types of) social dialogue in general, but with a focus on the representation and inclusion of non-standard workers. Chapter 5 discusses how and why non-standard work is used differently in distinct business models. Chapter 6 reviews the literature on the relationship between trade unions and non-standard workers and the extent to which trade unions want to and manage to represent this group of workers. Chapter 7 discusses alternative models of representation and voice, focusing on grassroots initiatives and institution-led initiatives, as well as in the way digitalisation has affected the representation of non-standard workers. Chapter 8 presents an outlook of the issues and questions that the review suggests as relevant and interesting for future research in general and for the IN_DI project in particular.

2 Agency of non-standard, precarious workers

Zozan Taşköprü, AIAS-HSI, University of Amsterdam

An important question when studying the relationship between social dialogue and non-standard, precarious workers is the dynamic of agency between different actors and what types of agency such workers have to attempt to improve their working situation. First, after defining agency, we discuss the agency of employers, as this shapes the structural and relational context within which workers' agency is exercised. We then identify three main forms of agency among non-standard workers: (1) the strategies and tactics they employ to improve their individual situation, (2) endurance and perseverance, and (3) forms of resistance which include social movements and union membership. While these forms primarily address how workers navigate and respond to precarious employment situations, we also discuss expressions of agency that extend beyond precarious situations, for example workers actively choosing non-standard employment for higher income.

Agency as relational and contextual

Agency is understood as the capacity of individuals to act, shape and control one's life, within structural constraints and opportunities (Trlifajová, & Formánková, 2023). Importantly, agency is a social and relational process, which is enacted through engagement with the contextual environment and other actors (Emirbayer & Mische, 1998). It is always oriented toward something, always in relation to people, places, meanings, and events. Agency can be described as ongoing conversation between the agent and structure. Furthermore, while structural arrangements may limit or facilitate agency, agency can also be sustained through everyday actions and can even contribute to the transformation of those structures (Emirbayer & Mische, 1998; Trlifajová, & Formánková, 2023). As agency is an ongoing conversation with people and places, understanding the context is necessary and will be elaborated further.

Shaping the labor context: Employer practices

Kalleberg (2012) describes the rise of non-standard work as a result of macroeconomic changes, including intensified global competition and labor market deregulation, which have heightened the need for flexibility. In response, employers have adjusted their organizational strategies to meet customers' demands, manage market unpredictability and reduce labor costs, including making it easier to dismiss workers, which has led to increase of non-standard work (Kalleberg, 2012; Kiersztyn, 2017).

Non-standard work refers to paid employment, which falls outside of full-time, permanent contracts (Richardson, Prentice & Lero, 2023). Examples are part-time work, self-employment, temporary contracts, seasonal work, and gig work. As these forms of employment have expanded, workers' attachment to a single employer has weakened. The erosion of direct employment relationships constrains and reshapes the forms of agency available to these workers (Ebisui, 2012). Taken together, these structural shifts

have transferred market risks from organizations to employees, placing non-standard workers in a vulnerable position within the labor market (Kiersztyn, 2017).

In literature, non-standard workers are often referred to as precarious workers. Precarious employment encompasses forms of work characterized by instability and insecurity in quality and/or quantity of employment, often accompanied with limited rights and protections (Allan, Autin & Wilkins-Yel, 2021). While precarious work primarily addresses insecure job characteristics, the concept of vulnerability extends beyond employment conditions, capturing intersectional, social, economic, and health-related risks faced by individuals (Boonjubun, Duman & Kahancová, 2025). Risks are pronounced for these vulnerable groups, including migrants, ethnic minorities, and low-income families (Boonjubun, Duman & Kahancová, 2025).

While non-standard work can increase the risk of precariousness and expose workers to insecurity, it should be noted that non-standard work does not necessarily lead to precarious employment and standard workers may also face insecurity (Murgia & Pulignano, 2021).

Literature frequently draws on insider-outsider theory to understand workers' positions within the workplace. In this framework, insiders or core workers are those in standard, permanent employment relationships, characterized by higher wages, job security, access to benefits and opportunities for promotion (Doeringer & Piore, 2020). Outsider or peripheral workers by contrast, are workers in more precarious arrangements, often with lower wages, weaker organizational attachment, and limited access to institutional protections (Doeringer & Piore, 2020). An example are temporary agency workers, which are often perceived as organizational outsiders with lower status (Sluiter, Manevska & Akkerman, 2022).

While previous literature has grouped non-standard workers together as outsiders and standard workers as insiders, important differences exist among non-standard workers themselves, regarding their position within the business model. Temporary agency workers are typically perceived as organizational outsiders. However, the situation may differ for gig workers, freelancers and the self-employed, who form the core and the primary labor force through which value is created. Given they form the core of the business model, this raises the question of what this means for their power and agency.

For non-standard workers, agency is enacted within a context of insecurity, shaped by complex and fragmented employment arrangements, which constrain and enable possibilities for action (Ebisui, 2012). Understanding their agency therefore requires situating actions both within fragmented employment relations, and the broader structures of insecurity, precarity and vulnerability. In the following sections, we examine how non-standard workers navigate this complex labor market and the strategies and tactics through which they exercise agency.

Strategies and tactics

Lewchuk and Dassinger (2016), argue that non-standard workers are not helpless victims. They are aware of the constraints of their working situation and actively

question its legitimacy, which can lead to lower acceptance of their conditions. Like standard workers, non-standard workers also seek to gain autonomy and control over their work. However, their trajectories and experiences differ, involving more risks and contradictions. They also strive to manage access to employment and resist exploitation and job insecurity. On the one hand, they try to apply to the demands of in order to secure more work; on the other, they seek control over how work is performed. In the competitive labor market, they remain aware that their behavior at work can influence their access to employment opportunities (Lewchuk & Dassinger, 2016). The tension between responsabilization and individualization on one side, and workers' vulnerable labor market position on the other, raises the critical question about how agency is enacted.

De Certeau (1984) also conceptualizes the "art of the weak", which refers to tactics, non-institutional acts performed by those without power in the dominant system. Tactics can be understood as momentary opportunities, in which powerless individuals improvise, manipulate, and turn situations to their own benefit. Building on studies such as Datta et al, (2007) and Williams (2006), which have focused on the tactics employed by vulnerable communities like migrants and refugees to survive in harsh realities, this study focuses on the tactics non-standard workers use to navigate the constantly changing labor market.

While this study adopts De Certeau's (1984) definition of tactics, it also draws on Mintzberg and Waters (1985) conceptualization of strategy to capture the more long-term actions of non-standard workers. Unlike tactics, which are momentary and opportunistic, strategies refer to planned efforts, often guided by ideological or normative frameworks. Although Mintzberg and Waters (1985) developed their definition more in the context of organizations, it can also be applied to individuals, as it reflects the planning and long-term orientations non-standard workers use to navigate their situation. What tactics and strategies share are that they both are individual level actions, aimed at improving one's own situation. Each will be discussed in more detail below.

Agency – Tactics - Control over work

The study of Harris and Ogbonna (2025), provides insight into how diverse groups of non-standard workers survive precariousness and the tactics they employ to gain more control over their working situation, which seems to depend on the resources and capital available to them.

According to the study, native workers which have access to resources, capital, labor market knowledge, were able to use their skills and networks strategically to gain more control. The tactics included, for instance, cajoling managers for extra shifts. Another group, consisting of second- or third generation immigrants, who were aware of their exploitation but possessed fewer skills and resources, adopted fewer active strategies, and acted mostly opportunistic instead of regularly. For example, by using their network of precarious workers, to exchange information and tips, taking small perks such as food or drinks. Finally, also called the most precarious group, consisting of first-generation immigrants educated outside Europe, tended to employ much more passive forms,

due their vulnerable position. Examples are minimal work effort, quite non-cooperation, rather than overt resistance.

Other tactics for gaining control over work include disengaging, threatening to leave, exit, as well as refusing employment that doesn't meet a minimum standard (Lewchuk & Dassinger, 2016).

Agency – Strategies - Control over access to employment

The internalization of neoliberal and meritocratic ideals is particularly evident among non-standard workers who are white-collar workers, with high levels of cultural capital, in terms of education and aspirations to the middle-class lifestyle (Mrozowicki & Trappmann, 2021). Workers try to buffer themselves against precarity and improve their individual situation by investing in education and training, reflecting their belief in meritocratic ideals.

According to Lewchuk and Dassinger (2016), workers use these strategies to improve employment opportunities, gain control over access to employment, and reduce the power of employer(s). Examples include engaging in intensified job searches, paying for their own training, working with different agencies, and applying for grants. On the other extreme, some individuals reject standard work at all and pursue self-employment.

The individualistic framework is also embraced by workers in art, culture, and individual entrepreneurship, who embrace non-standard work as an escape from the constraints of standard work (Mrozowicki & Trappmann, 2021). Although their working conditions also have negative sides, they adapt to these flexible arrangements, through their belief in autonomy, professional skills, and entrepreneurship. Moreover, while they are antagonistic towards large international corporations, they consider them as potential safety nets in times of high uncertainty.

Lewchuk and Dassinger (2016), argue that the pitfall of these strategies is that these are merely individual actions, which can increase competition for employment and further limit opportunities for collective action. Furthermore, these strategies may lead to self-exploitation, even when workers perceive themselves as acting in their own interest (Lewchuk & Dassinger, 2016). In this way, rather than resisting the insecurity associated with non-standard work or challenging neoliberalism and its internalization, these responses may instead reproduce and reinforce the very ideals that sustain it.

Agency – Endurance and perseverance

While strategies and tactics are discussed, it's also important to recognize that some individuals choose to endure their working situation rather than intervene in it. In this study, endurance is also understood as a form of agency, mostly shaped by constraints and limited resources to act. Various studies demonstrate that individuals with limited economic and cultural resources, may want to change their situation, but are disempowered by their lack of capital (Harris & Ogbonna, 2025; Mrozowicki Trappmann, 2021).

Mrozowicki and Trappmann (2021) describe precarious laborers, who aspire to stable, well-paid, standard employment. For these workers, work occupies a main place in their life, as means for social integration, identification and achieving life goals. However, this group often lacks both capital and belief in their individual and collective abilities, to change their working situation and labor market. Another problem is that some individuals blame others, such as parents or institutional gatekeepers. While some individuals succeed in blaming the system, they are reluctant to take action, leaving them trapped in their precarious situation.

The situation is further exacerbated for immigrants, who often face a lack of social and cultural capital, have limited knowledge of organizational, legal, and cultural system, as well as of the formal and informal rules (Harris & Ogbonna, 2025). In Harris and Ogbonna's (2025) study, these constraints led individuals to "survive" precariousness through endurance and perseverance, as they felt that expressing resistance would not be wise in their position.

Precarity and development of critical awareness

At the same time, questioning and criticizing precarity is shaped by critical awareness. Individuals who have developed political consciousness, for example during educational experiences, are more able to frame individual problems in structural terms (Mrozowicki Trappman, 2021). The experience and survival of non-standard work are dependent on three factors: 1) the capital the individual possesses, 2) who they hold responsible for their situation, and 3) their level of political consciousness.

Besides class differences, Mrozowicki and Trappmann (2021), also highlight the impact of age. The application of the steppingstone framework and support from home can make young workers perceive their situation as less problematic (Mrozowicki & Trappmann(2021). Nevertheless, the study of Mrozowicki and Trappmann (2021), suggest that with age, the tendency to question and criticize precarious working situations also increase. Precarity comes particularly problematic if economic and employment insecurity is combined with lack of social networks, and other biographical problems, for example health, family problems. Overall, the experience of non-standard work and the extent to which it is problematized appears to depend on the individual workers' situation and broader life context.

Even if non-standard workers attempt to resist, the growing emphasis on responsabilization, may discourage them from engaging with unions or collective action to pursue shared interests (Hamel, 2003). Lewchuk and Dassinger (2016) argue that the pitfall of most of the strategies discussed earlier is that they are primarily individual actions, which further limit opportunities for collective action.

Agency – Resistance

Furthermore, one of the reasons for the lack of collective action against precarious work is that, according to Mrozowicki and Trappmann (2021), neoliberal and meritocratic ideals have been internalized. As a consequence, precarity is no longer considered a structural phenomenon, but rather as the result of individual failure, effort, and investment, which explains the absence of collective resistance against it. Foucault

(1991) also uses the panopticon as a metaphor for modern society, where techniques of power are internalized and used to monitor and shape individuals' behavior. After all, power is acceptable because it masks itself (Foucault, 1990). This raises questions as to how non-standard workers navigate non-standard employment, how they manage their uncertainties, and how intersectional factors shape these experiences.

However, as Foucault (1990 p.95) reminds us "where there is power, there is resistance". This perspective leaves room for the possibility that, even under neoliberal and individualized conditions, solidarity among workers and collective resistance may still emerge. The following sections will therefore explore how solidarity manifests and what forms of collective resistance take place among non-standard workers.

The foundation of collective resistance: solidarity

D'art and Turner (2002) also discuss how processes of individualization and detraditionalization have undermined the foundations for solidarity and collective action. They define collective action as a process through which workers develop feelings of reciprocity and responsibility toward one another, based on their awareness of shared interests and purposes, being prepared to act on solidarity (Tassinari & Maccarrone, 2020). Solidarity is considered critical for collective action and emerges when workers recognize their common interests and cultivate a strong sense of identity, attachment, and allegiance (D'art & Turner, 2002).

However, solidarity seems harder to develop than in traditional Fordist workplaces, due to the lack of physical co-presence and reduced visibility of the collective nature of the labor process (D'art & Turner, 2002). The nature of precarious employment itself seems to be problem, due to 1) the lack of lasting relationships among employees, 2) isolation and estrangement from coworkers, and 3) the perception of other employees as competitors for jobs, rather than as allies for common interest (Lewchuk & Dassinger, 2016). Furthermore, research indicates that for example temporary agency workers are more likely to be perceived as outsiders with lower status (Sluiter, Manevska & Akkerman, 2022). They receive less collegial backing and are less likely to receive peer support when voicing concerns.

However, the study of Tassinari and Maccarrone (2020) demonstrate solidarity still can be developed among non-standard workers, In their case for gig-workers, through overcoming individualization. Overcoming individualization became possible in spaces, free from management control, physical or virtual, where workers could meet and interact. Tassinari and Maccarrone (2002) also argue that, rather than viewing solidarity as a simple dichotomy of presence or absence, it should be understood as a continuum, encompassing various forms of solidarity. This continuum of solidarity involves multiple forms of solidarity, ranging from mutual help and support among workers, to individual acts of resistance, to more collective forms.

While their study focused on gig workers, who could recognize one another as colleagues through uniforms, it raises questions about how solidarity can be developed among self-employed individuals or other forms of non-standard workers and could lead to social movements. This question is particularly relevant given that self-employed

workers have no manager at all, and others may have internalized a self-management framework.

Social movements

Social movements are a form of collective action, defined as organized and informal entities that pursue goals, which can range from focused on specific policies to broader cultural transformation (Christiansen, 2009). Christiansen (2009), also proposes a typology of social movements, outlining four stages of social movements, which will be discussed further, alongside insights from Kelly's (2005) study. Kelly (2005) also argues that the process of social movement formation closely resembles the process of workers joining unions.

The first stage of social movements, Emergence, is characterized by minimal organization. Individuals are dissatisfied with a policy or their situation (Christiansen, 2009). Their responses are individual rather than coordinated, for example by expressing complaints to friends and family, without employing strategic and collective effort. The second stage, Coalescence, marks the development of collective action. Members communicate their discontent, identify who are responsible for it (Christiansen, 2009). According to Kelly (2005), workers experience a sense of injustice and develop a shared social identification, recognizing that this injustice cannot be explained away by another force, for example globalization. Instead, the cause is attributed to an external group, such as management. Workers engage in cost-benefit calculations and develop a sense of agency and belief that they can make a difference through collective organization and action (Kelly, 2005). Workers in this stage may engage in visible actions such as mass demonstrations to state specific demands (Christiansen, 2009). The third stage, Bureaucratization, occurs when the movement becomes more organized and professional. Clear rules, leadership structures, trained staff, and coordination are part of this stage. The fourth stage, Decline, is the dissolution or decline of the movement. This can result from several reasons like success, organizational failures, loss of interest or repression.

Union membership

As non-standard work falls outside the traditional model of employment, established systems of representation and negotiation are challenging (Ebisui, 2012). Because many non-standard workers are not directly employed, work for short periods and/or are formally employed through intermediaries rather than direct employers, their collective interests become difficult to articulate and organize. The factors shaping union membership can be grouped into workplace, individual and legal dimensions, which will be further discussed.

The underrepresentation of non-standard workers in unions is driven by the limited union presence in workplaces, and the challenges unions face in accessing these workers (Vandaele & Leschke, 2010). These challenges are further compounded as many non-standard workers are employed in small workplaces with high labor turnover. Part-time workers and self-employed workers are difficult to recruit using traditional union strategies. Self-employed workers also have more specific, individualized interests, which

require more personalized solutions than collective approaches. Additionally, limited contact with colleagues and employment in workplaces with low union membership further diminishes the perceived relevance of union membership.

Legally, non-standard work challenges the traditional parameters of employment organization, creating ambiguity about the application of labor laws (Ebisui, 2012). Existing legal frameworks often fail to provide adequate mechanisms for non-standard workers to exercise their rights. The insecure labor market position of non-standard workers also causes reluctance to organize or exercise their rights, as many fear job loss. Trade union presence and bargaining coverage are typically low or non-present for this group.

Despite all odds: Stories of success

Despite the difficulties associated with non-standard work, studies show that collective agency remains possible even under fragmented forms of work. For example, Tassinari and Maccarrone (2020) demonstrate how gig-workers, despite the individualized, isolated, and competitive nature of gig work and imbalanced power relations, were able to build solidarity and engage in collective action. Through the creation of free spaces, workers communicated, shared grievances, and developed a collective identity. Their findings show that solidarity can emerge even in highly individualized and competitive contexts.

Similarly, Wood and Lehdonvirta (2011) illustrate how gig-workers, who identify as self-employed have engaged in collective action online. Through digital platforms, viral hashtags and petitions, workers expressed shared antagonism. These examples suggest that the organizational and institutional context of non-standard work shapes the forms of resistance workers adopt and the strategies they employ.

At the same time, the capacity to form solidarity and collective action appears to vary depending on workers' structural position within the business model. In organizational settings where non-standard workers have a peripheral position alongside standard insiders, collective identification may be more difficult, and these workers may feel powerless. An example are temporary agency workers, who endure challenges in voicing concerns, as they don't expect any collegial blackening and feel like outsiders. In contrast, gig workers and freelancers, although fragmented, seem to be successful in forming a collective identity and collective action. This can be due to the fact that they form a more central core of the business model, constituting a structurally central role in value production of the platform.

Although we have discussed the different forms of agency separately, they often overlap in practice. Tassinari and Maccarrone (2020) show how non-standard workers endured difficult working conditions until trigger points, such as change of contractual terms, have led to resistance and strike action in Italy. This illustrates the dynamic nature of agency, where endurance can transition into collective action. Moreover, different forms of agency can occur simultaneously. For example, workers may employ tactics at the workplace while also seeking alternative employment opportunities and investing in training.

These studies highlight that agency is relational and political, shaped by multiple factors, including relationships with colleagues and supervisors, institutional support such as unions, and the broader structural vulnerabilities of non-standard workers (Sluiter, Manevska & Akkerman, 2022). Power imbalances and intersectional vulnerabilities can constrain individual agency, limiting workers' ability to voice concerns and participate in social dialogue. Workers positioned at the periphery, those with fewer resources, lower status and less union support, may face difficulties in asserting their voice, which further exacerbates their vulnerability.

Agency beyond resistance

While much of the literature emphasizes agency in precarious work in terms of resistance, agency is not necessarily resistant. For example, individuals from working-class and lower-educated backgrounds seem to express gratitude for non-standard employment as they think it's the only job they could get (Trappmann et al., 2024).

Conversely, a substantial body of research highlights the perceived advantages of non-standard work, showing that some workers actively choose these employment arrangements. Mattijsen (2021) argues that individuals may choose to trade employment security of standard work in exchange for higher economic earnings of non-standard work. Other individuals pursue non-standard work for its promise of autonomy and freedom (Trappmann et al., 2024). A prominent example are platform workers, who have turned from standard work to platform work, as an escape from the constraints of standard work, attracted by promises of autonomy, flexibility, and the prospect of being one's own boss (Purcell & Brook, 2022).

However, critics note the precarious and exploitative dimensions of platform labor, arguing that workers find themselves in even more intense forms of exploitation (Purcell & Brook, 2022). Platform workers seem to be stripped of employment rights and protections, intensively exploiting themselves and being controlled through algorithmic systems, masked by a façade of freedom and autonomy.

Taken together, these studies illustrate that agency in non-standard work is multifaceted. It can involve tactics, strategies, endurance, and voluntary engagement with flexible work arrangements. The experience of non-standard is not determined solely by contractual conditions, it's shaped by individuals' interpretations of their working situation, their social and institutional context, life stage, political consciousness, and the forms of capital they process. Consequently, the ways in which they enact agency also differ.

Understanding how agents navigate their vulnerable positions and interact with structural constraints and possibilities, provides a foundation for understanding their role in social dialogue. These findings further demonstrate that non-standard workers, as agents, are in constant conversation not only with other actors, but also with institutions and structural conditions. Their position is simultaneously political and relational, and cannot be understood in isolation from either their broader context or their specific position within it.

These perspectives underscore the need for future research to better understand the identities and subjectivities of non-standard workers, including their interests, needs and attitudes towards collective action within fragmented and insecure employment arrangements. While agency has been mostly theorized in relation to standard work, less attention has been paid to the agency of non-standard workers, despite their growing presence in labor markets.

Given that a great part of non-standard workers experience precarious employment, it is also crucial to integrate insights from precarious work literature with research on collective organization and representation. This understanding can provide deeper insight into the role that collective organizations and trade unions can adopt in representing and mobilizing these workers.

Moreover, understanding employer motives and strategies within non-standard employment relationships is equally important for understanding the structural and relational constraints within which non-standard workers exercise agency. These gaps highlight the need to address the following research questions in future research:

- What are the identities and needs of non-standard workers?
- How do non-standard workers' identities and needs shape their engagement with collective action and representation?
- What forms of agency do non-standard workers exhibit and how are these shaped by individual, social and structural factors?
- How do employer motives and organizational strategies determine the structural and relational context in which non-standard workers exercise agency?
- How can collective organizations and trade unions effectively represent and mobilize non-standard workers?

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3 Why should workers have a say and does it make any difference?

Sissel C. Trygstad, Fafo

The right of workers to represent their own interests and to exert influence over decisions made by employers constitutes a fundamental aspect of democratic working life and is a vital component of a democratic society. This dialogue occurs across multiple levels and arenas. To secure a democratic working life, The International Labour Organization (ILO) underscores the importance of peak-level social dialogue, defined as national and sectoral processes, whether ad hoc or institutionalized, that bring together representatives of governments, employers' organisations, and workers' organisations. According to the ILO, such dialogue serves as a safeguard against the erosion of democratic space within the world of work, supports the realisation of fundamental principles and rights at work, and fosters socially and economically balanced outcomes (ILO, 2025, p. 2). Nonetheless, social dialogue is not confined to national or sectoral arenas; it may also occur at the level of individual enterprises, where workers and employers engage in discussions or negotiations concerning different workplace-related matters, such as wages, employment strategies and working conditions. In this chapter, we explore how the following questions are addressed in literature: i) why should workers participate in decision-making processes, ii) how can participation unfold, and iii) what do we know about democracy and participation among different groups of workers, including workers in non-standard work?

The rationale

When democracy at work or social dialogue becomes the subject of a literature review, one encounters a wide array of concepts and theoretical approaches. In addition to social dialogue, terms like voice, empowerment, cooperation, co-determination, involvement, participation, representation and influence are commonly employed. These concepts are not invariably synonymous and may be situated within different theoretical traditions. In this chapter, participation is a central concept—without participation, influence cannot occur. However, participation does not necessarily imply influence. Further, we focus on workers participation on different levels from the workplace and company level up to the EU level, and the involvement of multiple parties. Tripartite social dialogue includes representatives of government, employers, and workers, while bipartite social dialogue refers to interactions between employers and employees at the enterprise or establishment level. This distinction highlights the difference between representative participation, on the one hand, and individual participation, on the other, where the employee represents only themselves. For instance, scholars within the Human Resource Management and Organisational Behaviour tradition explicitly incorporate the individual dimension (Wilkinson et al., 2014). Our primary concern lies with representative participation and influence. The emphasis on representative participation is clearly reflected in the ILO's definition of social dialogue: "all types of negotiation, consultation or simply exchange of information between, or among, representatives of

governments, employers and workers, on issues of common interest relating to economic and social policy" (ILO, 2020). This broad definition forms the backdrop for this chapter. However, like all definitions, it must be deconstructed and operationalised.

The link between working life and democracy may also be seen as an implicit part of the European Pillar of Social Rights, by reinforcing the social dimension of democracy through social citizenship, social dialogue, solidarity and social rights. Among the main principles of the pillar is to secure social dialogue at different levels, and equal treatment regarding working conditions, access to social protection and training regardless of the type and duration of employment relationship. This is particularly important given that a significant proportion of workers are engaged in atypical forms of employment. In 2021, 14% of workers in the EU were in temporary employment, 18% held part-time positions, and a further 9% were registered as self-employed without employees (Eurofound, 2023, pp. 7, 16).

The rationale for involving workers and their representatives in decision-making processes has deep roots in the social sciences and touches upon fundamental questions related to democratic principles such as freedom, justice, and equality. Nevertheless, the involvement of workers may also be justified from a corporate, profit-oriented perspective, where it is regarded as an effective mechanism. Our starting point is that the normative justification for worker's involvement shapes how these concepts are operationalised. This includes the level at which workers participate or are given voice mechanism, the form of it - whether formal or informal and the coverage, understood as who is included. In this chapter, we are particularly concerned with studies that address the participation, voice or representation of workers in non-standard work, defined as all workers whose terms of employment do not correspond to the standard employment, that is guaranteed fulltime and open-ended subordinate employment contract. Our focus is especially on those experiencing precarious employment, which could be defined as a 'high degree of worker insecurity and instability in an employment relationship or labour market' (Dollegast et al., 2018, p. 1). While these workers may have interests that align with those in permanent, full-time positions, they may also hold distinct concerns. Accordingly, both the subject matter and its timing are of participation are crucial factors influencing the outcomes of social dialogue.

The normative justification: Because it is fair – because it is effective

Discussions concerning why workers should participate, the various forms of participation, voice, and influence, including their underlying rationales, modalities, and interrelationships—were particularly prominent in academic debates throughout the 1970s, 1980s, and 1990s. This prominence can partly be attributed to the surge of interest in democratic theory during the 1970s and 1980s (Holmqvist & Ide, 2016; Axelsson & Bergman, 2016).

How these questions are answered varies in accordance with specific conceptions of democracy, society, and the economy, as well as with differing views on the relationship between capital and labour. For instance, expanding workers' rights to participate in a zero-sum game may be seen as an attempt to limit managers' and/or shareholders' scope for action (Coates, 2003: 35, in De Spiegelaere et al., 2019, p. 69).

According to Ramsay (1983), managers' interest in employee representation must be analysed considering the strength of labour within the workplace. Employers' rationale for facilitating participation or voice is therefore merely superficial and does not stem from a genuine desire to share power. However, securing workers' rights to participate can also be viewed through the lens of a non-zero-sum game. It may be argued that a democratic working life requires institutions for cooperation that enhance power for all, by subjecting ourselves to a division of labour built on trust (Høibråten, 2009).¹ Furthermore, changing conditions such as increased international competition, technological developments, and the transition to a green economy are prompting employers to take a genuine interest in involving employees in decisions of a more strategic nature (Holland, 2014). At the same time, and as De Spiegelaere et al. (2019, p. 69) and Wilkinson et al. (2014) point out, measures that aim to involve workers but do not meaningfully redistribute authority in their favour, or that rely solely on the goodwill of employers without any legal guarantees or enforceable agreements, should not be understood as constituting the democratisation of work.

Despite democracy being a core principle of the European Union, there is, according to De Spiegelaere et al. (2019), a tendency to regard what occurs within enterprises, public services, and the economy more broadly as existing outside the boundaries of democratic life (ibid., p. 71). As Robert A. Dahl noted: 'In almost all, perhaps all, organisations everywhere there is some room for some democracy; and in almost all democratic countries there is considerable room for more democracy' (Dahl, 1998, p. 118).

The question of why and how workers should be involved can be analytically framed through a distinction between rights-based and efficiency-based justifications. The former emphasises participation as a democratic right, while the latter focuses on voice as a mean to enhance organisational effectiveness. This analytical distinction continues to inform contemporary debates on the nature and purpose of social dialogue.

Because it is fair

Participation and influence are here understood as part of a broader social phenomenon—one that both shapes and is shaped by society, its institutions, organisations, and individuals. The justice-based rationale is evident in theoretical traditions such as Power Resource Theory (PRT), Labour Process Theory (LPT) and perspectives like Industrial Relations (IR) (Doellgast, 2022; Wilkinson et al., 2014, p. 9; Knudsen, 1995). The justice-based rationale has long held a prominent position within the labour movement. As we will come back to below, this perspective includes a concern with participation in and influence over overarching strategic and tactical issues at different level.

Within the rights-based approach, scholars emphasise the importance of formalising participation and influence through collective agreements between social partners at the national, sectoral, and enterprise levels. This perspective underscores that representative participation is essential for challenging the asymmetrical power relations between labour and capital (Korpi, 1978; Knudsen, 1995; Haipeter, 2019). Collective worker interests are viewed as crucial both as a buffer and as a mechanism for shifting power dynamics by expanding the scope of decision-making through democratic processes

(Rappaport, 1987). Power equalisation is therefore regarded as a prerequisite for a democratic working life and society.

PR offers a theoretical framework for understanding how power enables collective actors to participate in and influence both political and corporate decision-making. Korpi (1978) defines power resources as “the properties of an actor that provide the ability to reward or punish another actor.” (p. 35) The theory is grounded in the notion that workers can safeguard their interests by collectively building power resources to contest the imbalanced power dynamics between capital and labour, or to influence political decisions concerning labour market regulation and welfare state development. The potential for building such collective power resources varies depending on the industrial relations and employment regimes in which workers are embedded (see chapter 4). Consequently, power resources may serve to strengthen and broaden the scope for worker participation. Within this tradition, some scholars use voice as a synonym for participation (see Freeman & Medoff, 1984; Spiegelaere et al., 2019). However, scholars aligned with the Labour Process Theory (LPT) tradition argue for the use of concepts such as participation, representation, and countervailing sources of power, as well as collective worker mobilisation against the inherent tensions of a capitalist economic system (Wilkinson et al., 2014). According to Wilkinson et al. (2024), employee voice in this context may be regarded as a form of employer control, implemented when employers fear union power.

The justice-based rationale has also long held a prominent position within the labour movement. The focus has mainly been on unionized workers. However, ensuring social dialogue *for all workers* e.g., also those in non-standard positions, is seen important from a broader democratic perspective. Through active involvement, individuals cultivate the skills, confidence, and sense of agency necessary for broader democratic engagement. This is emphasised by Carole Pateman (1970), who considers workers participation as a fundamental element in democracy, and the workplace is seen as a significant arena for developing political and democratic skills in society as a whole offering political education and contributing to increased voter turnout (1970, pp. 42–43; 2012). She suggests that the workplace can serve as a training ground for democratic citizenship, where everyday participation fosters trust in institutions and strengthens democratic culture. In contrast to PRT, Industrial Relations, and LPT, which primarily apply a top-down perspective on worker participation, Pateman’s theory of participatory democracy adopts a bottom-up approach.

According to Winkelman (2013), Pateman’s connection between workplace participation and democracy was long considered an exception within contemporary democratic research, where little attention has been paid to the concept of work, and even fewer studies have treated work as a central concern of democracy (ibid., pp. 357–358). However, the effects that participation may have on democracy, tend to be particularly pronounced among low-skilled and low-income workers, thereby helping to reduce political inequality (Bryson et al., 2014). Moreover, recent research suggests a link between employment relationships, trust, and democracy: workers in non-permanent employment with low job security tend to exhibit lower levels of trust in their peers (Ryan & Turner, 2021). Additionally, those engaged in non-permanent and informal employment

arrangements express diminished satisfaction with the overall efficacy of democratic processes (Eurofound 2023, p.2.). De Spiegelaere et al. (2019) do also refer to two recent studies showing that employees in jobs characterised by greater autonomy and involvement tend to be more politically active and exhibit higher levels of trust in democracy (Budd et al., 2018; Timming & Summers, 2018, in De Spiegelaere et al., 2019, p. 72).

Because it is effective

As a result of declining unionisation rates in several countries, and the consequent weakening of trade unions and their influence at various levels, it has been argued that the utility-based or efficiency-driven argument for involving employees (individual, teams or groups of employees) in managerial decision-making has gained considerable attention and traction, even in countries where trade unions and employee representatives have traditionally held a strong position, such as in the Scandinavian region (Hvid & Falkum, 2019; Busck, 2010). Within the efficiency-oriented perspective, there is less emphasis on power relations and conflicting interests, and the focus is primarily on employee voice at the enterprise level. This perspective highlights the connection between voice, elimination of dysfunctional features, task execution, and work effort (Dachler & Wilpert, 1978, p. 4). As Philip Selznick asked in the 1950s: How can we improve motivation, communication, and decision-making to create a more agile organisation?' (Selznick, 1957/1997, p. 16).

Various traditions such as Organisational Behaviour (OB), Human Resource Management/Employment Relations (HRM/ER), High Performance Work Systems (HPWS), and Lean tend to frame participation within a utility-based rationale (Mowbray et al., 2014; Wilkinson et al., 2014). At its core, this perspective seeks to identify shared interests between employers and employees, or those that ought to exist. Voice is primarily viewed as a strategic management tool, which, if effectively utilised, can contribute to organisational efficiency (Mowbray, 2014; Trygstad, 2004). Accordingly, the degree and arena of participation may shift depending on the organisational goals (Trygstad, 2004).

Nonetheless, differences exist between academic traditions. The OB tradition largely focuses on the individual employee dimension, conceptualising voice as a form of pro-social behaviour intended to support positive organisational development. Voice is defined as "the discretionary communication of ideas, suggestions, concerns, or opinions about work-related issues with the intent to improve organisational or unit functioning" (Morrisson, 2011, p. 375), and often linked to organisational and managerial principles and used as a tool for eliminating dysfunctional organisational traits (Dachler & Wilpert, 1978, p. 4). OB perspectives are primarily concerned with organisational improvement, and it is therefore up to management to reduce or modify existing voice arrangements in accordance with the organisation's needs.

In contrast, HRM/ER considers the institutional opportunities available to employees for expressing their views in a more critical way (Donaghey et al., 2011). This tradition places greater emphasis on formal mechanisms for voice, and scholars have called for the inclusion of macro-level variables, such as industry, economic conditions, and labour market structures (Mowbray et al., 2014, p. 2). There is a consensus within

HRM/ER that employee voice should be defined as “an opportunity to have a say” (ibid., p. 4), and the perspectives recognise that it is a fundamental democratic right for workers to exercise a degree of control over managerial decision-making within an organisation. (Wilkinson et al. 2018; Kaufman, 2015): ‘Thus, everyone should have a voice and a lack of opportunities to express that voice may adversely affect workers’ dignity’ (Wilkinson et al. 2018, p. 711). At the same time, Mowbray et al. (2014) cite Strauss (2006), who argues that ‘voice is a weaker term than participation’ (ibid., p. 4). Wilkinson (2011) further clarifies this by stating that ‘voice does not denote influence and may be no more than spitting-in-the-wind’ (Wilkinson, 2011, p. 66).

The Relationship Between the Two Perspectives

The balance between these two perspectives varies depending on institutional contexts across different countries and governance levels. The decline of union voice in several western countries has raised a concern about how voice is affected in workplaces without any union present (see Pohler & Luchak 2014). Further, recent shifts in the labour market necessitate a rethinking of how to ensure social dialogue, participation and voice in settings where non-standard work is prevalent, no stable core workforce exists, and workers move between employers or digital platforms.

In Western societies, it is reasonable to view participation and workplace democracy within the framework of managerial prerogative (Engelstad, 2015). Nonetheless, participation grounded in efficiency and fairness is weighted differently depending on the perspective. From a corporate profit standpoint, the emphasis on effectiveness serves as a key rationale for social dialogue, facilitating problem-solving and fostering worker commitment. In continuation of this, it is reasonable to argue that employers, unless pressured by a trade union or other key stakeholders, will only facilitate participation and voice if it appears beneficial to them and to the organisation. If not, involvement of employees may be perceived as a disruption to the ideal of a streamlined organisation, as it places constraints on managerial prerogative.

From a trade union perspective, social dialogue is justified by fairness considerations rooted in a rights-based approach, highlighting the need to improve employment terms and working conditions in line with workers’ interests. How the perspectives are balanced, can be related to different employment regimes (Gallie, 2007; 2011).

Inclusive regimes are characterised by high levels of employment, universal employment rights, and strong social safety nets that help reduce disparities between employment statuses and prevent labour market polarisation. The Nordic countries are frequently cited as examples of inclusive employment regimes. In these contexts, efficiency- and rights-based perspectives often overlap, although their emphasis varies across sectors and companies. Alsos & Trygstad (2022) demonstrate how both perspectives are reflected in the Basic Agreement between Norway’s peak organisations – participation is intended to promote efficiency and productivity, while also ensuring workers’ involvement and protection.

Dualist regimes guarantee strong rights for a core workforce of skilled, high-paid and long-term employees, often at the expense of poor working conditions and low security

for those at the margins. In such regimes, permanently employed workers are granted opportunities for participation and influence, partly because employers see the benefit of retaining qualified staff or in order to retain skilled labour. However, NSWs frequently fall outside the established structures and channels for workplace participation (Wilkinson et al., 2021).

Market-based employment regimes emphasise minimal regulation for all, making the distinction between insiders and outsiders less pronounced. This may involve various forms of individual voice but offers few collective arrangements for representation. Due to weak collective worker power, efficiency-driven arguments for voice tend to carry greater weight. Participation is more likely to be individual or team-based and tends to be ad hoc in nature.

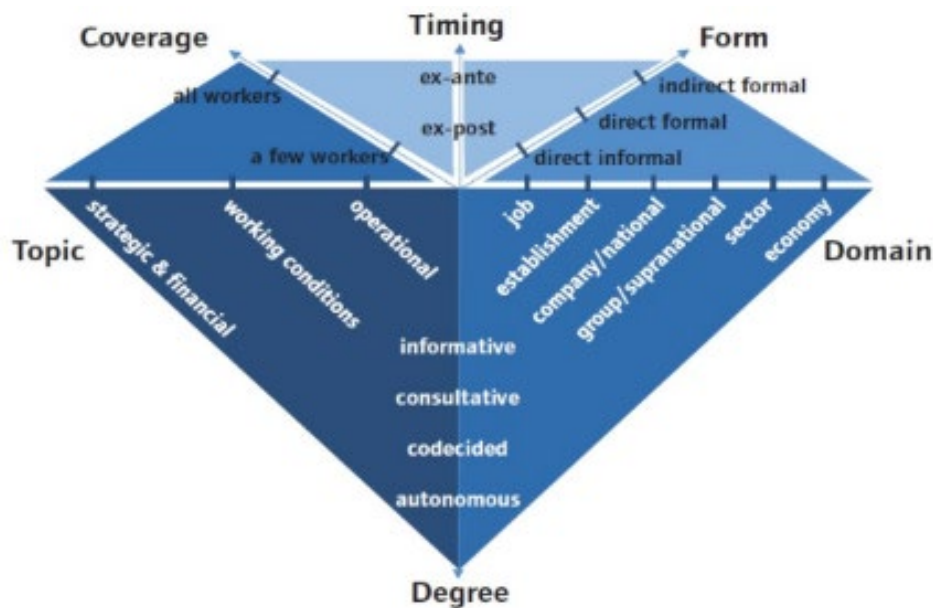
It is nevertheless important to emphasise that employment regimes alone do not fully explain the balance between efficiency and fairness. Although this balance is shaped by institutional frameworks across countries and governance levels, it is also influenced by management's perceptions and behaviour (Alsos & Trygstad, 2022; De Spiegelaere & Vitols, 2024, p. 146). At the same time, research indicates that the combination of the two perspectives makes a difference. Freeman and Medoff (1985) argued that workplace representation provides a collective voice through which employees can contribute to resolving workplace issues and enhancing productivity. In other words, it may be both effective and beneficial for employers to facilitate employee participation. Building on this, De Spiegelaere and Vitols (2024) highlight research suggesting that representation also strengthens managerial accountability. At the organisational level, large-scale surveys have enabled researchers to assess the impact of works councils. In Germany, for example, there is a well-established tradition of examining how works councils influence a wide range of outcomes, including training, health and safety, pay inequality, and more (Addison, 2009; Hübler & Jirjahn, 2003). Nienhüser (2014) adopts a more balanced perspective and, based on extensive qualitative studies, concludes that:

...it is fair to say in summing up the findings that the existing of a work council does not reduce company performance and, under certain conditions, has a productivity-enhancing or value-added-enhancing effect (Nienhüser, 2014, p. 258)

Similarly, survey research in Belgium has demonstrated the positive effects of local union presence on vocational training, the enforcement of collective rights (Hermans et al., 2020), and productivity (van den Berg et al., 2017). The following section takes a closer look at what participation entails and how it is practised.

How participation can unfold

All over the world, most people spend a large part of their waking at work (...) Individual and collective participation rights at work are therefore of crucial importance for the quality of life in any given society (...) No true democracy is possible without employee's participation at the workplace. (Pries, 2019, s. 39).



Source: De Spiegelaere et al., based on Van Gyes 2006; Marchington, 2005:26-29, Knudsen, 1995:9, Gold & Hall, 1990:25, Davis and Lansbury, 1986:2; Conchon, 2014: 72-97, in De Spiegelaere, et al. 2019, p. 71

The rationale behind why workers and their representatives should participate will influence how participation is practiced, e.g. in terms of its form, degree, and outcomes. De Spiegelaere et al. (2019, pp. 70–71) have examined ‘democracy at work’ from both theoretical and empirical perspectives. They present six distinct dimensions that are important in this context, illustrated through the Diamond of Democracy. The further one moves ‘outwards’ in the diamond, the greater the degree of democracy at work. The starting point is ‘degree’.

Degree

The degree of involvement or participation may range from weak to strong. A weak form would be where employers invite employees into bipartite social dialogue with the intention of informing them about decisions that have been made or are about to be made in the near future. A strong form would involve trade union representatives and/or other employee representatives participating in negotiations or holding veto power. The degree of participation will influence the outcome. There is a significant difference between merely being informed and actively negotiating or having co-determination in a decision.

Topics

The types of decisions in which employees participate also represent a key dimension. Decisions can be classified within a hierarchy (Knudsen, 1995; Busck et al., 2010; De Spiegelaere et al., 2019). In the Diamond, De Spiegelaere et al. (2019, p. 70) use three distinct topics: operational (as the lowest level), working conditions, and strategic and financial topics as the highest. Knudsen (1995) defines four types of management decisions, arranged hierarchically according to their significance for both employers and employees. Welfare decisions concern company-specific welfare provisions (e.g. canteens, housing facilities), while operational decisions relate to how work is to be carried out (e.g. defining tasks and assigning workers). Tactical decisions involve the

means by which goals are achieved, including work organisation, working hours, and personnel management. Strategic decisions, on the other hand, encompass overarching choices regarding the company's goals and structure, such as investments, mergers, acquisitions, and partial or full closures (Knudsen, 1995:11). Knudsen's typology was developed at a time when permanent full-time employment was still the norm in many European countries. Over the past decades, national labour markets have become more heterogeneous in terms of nationality, and the proportion of workers in non-standard employment has increased. This shift necessitates a rethinking of the topics addressed, so that they better reflect the needs of diverse groups of employees. Further, over the past decade, there appears to have been a shift in the literature, with increased focus on 'well-being'. Guest (2025) highlights 'the challenges posed by contemporary employment with growing incidence of mental health problems and a recognition of the costs of low well-being to organisations and to society more widely' (Guest, 2025, p. 326). Well-being is defined as 'The overall quality of an employee's experience and functioning at work', and is related to psychological, physical and social functioning. Physical well-being is concerned with health reflected in both physiological and subjective indicators, the latter including perceptions of health, levels of energy and work-related stress. The social aspects of well-being include positive social relations at work, fair rewards, fair treatment and sufficient opportunities for voice (ibid.).

Domains

The strength of democracy and its outcome are also linked to the domain of the decision. Is it a decision related to a team of employees, a department, the enterprise, the national company, or an entire multinational corporation? For example, employee representation on company boards expands the domains by enabling participation in tactical and strategic decisions that affect the entire enterprise or corporate group. Furthermore, these domains may be connected to a particular sector or the broader economy (ibid., p. 70). In these cases, trade unions may participate in tripartite social dialogue concerning developments in the labour market and/or the economy, e.g. the working conditions for NSWs. The focus on domains enables De Spiegelaere et al. (2019) to link the organisational level to both the sectoral and national levels. Thus, democracy at work is not confined to individual enterprises or corporate groups but could include workers without a permanent attachment to a specific workplace, i.e. those in non-standard employment.

Coverage

Another dimension of relevance in our context is coverage. Does the mechanism for democracy, participation, and voice apply only to a few or very specific groups of employees, for example, unionised workers within the enterprise, or does it extend to and engage all workers, including those in atypical employment? Coverage indicates whether democracy is limited to the core or insiders of the organisation or labour market, or whether it also encompasses decisions affecting a broader group of workers, the outsiders (De Spiegelaere, 2019, p. 70). Who is covered may also influence the outcome. For instance, decisions to extend collective agreements that may ensure a wage floor and decent working conditions, will also include non-unionised workers or employees in companies without collective agreements and/or employee representation.

Timing

The timing of when trade union representatives or other employee representatives are involved in decision-making processes also affects the outcome. Is their involvement prior to decisions being made, or afterwards? If it occurs afterwards, it typically takes the form of being informed. However, if participation takes place beforehand, employees may also engage in negotiations and thereby exert a certain degree of influence. For example, Trygstad and Jensen (2023) find that union representatives who are involved in decision-making processes related to organisational restructuring perceive their influence over the outcome to be significantly greater than those who are merely informed.

Form

De Spiegelaere et al. (2019) point out that representative participation may be formal or exclusively informal, but it can also be a combination of both. This combination is regarded by Alsos and Trygstad (2022) as an operationalisation of the Nordic model, or what has also been referred to as inclusive employment regimes. In such contexts, trade union representatives participate in various formal forums for social dialogue, while also engaging in informal conversations with their immediate managers about matters concerning the enterprise or their members. Based on survey data from union representatives in the three largest trade unions in the Norwegian private sector, Alsos and Trygstad (2022) found that those who participate in both formal forums with management and meet informally with management are the ones who perceive their influence to be the greatest. Next in line are those who only participate informally. The least influence is perceived by those who only meet management informally (Alsos & Trygstad, 2022).

However, it is important not to assume that only formalised mechanisms are capable of addressing challenges related to employee voice (Dietz, Wilkinson, & Redman, 2009). In recent years, there has been growing recognition of the role and value of informal voice; spontaneous, unstructured interactions between managers and employees that facilitate the exchange of information and opportunities for consultation (Marchington & Suter, 2013; Morrison, 2011).

In tripartite social dialogue, the form naturally varies, from consultative to advisory, but when it comes to economic and labour market policy, the sitting government retains veto power, even though decisions may provoke protests from both employer and employee organisations. According to Alfonso et al. (2025), the stronger and more organised the labour unions are, the greater the incentives for governments to include them in policymaking. For governments, the rationale for engaging in negotiations with employers and trade unions over policy is to secure support from key stakeholders in the labour market.

Democracy and Participation Among Different Groups of Workers

As previously discussed, democracy at work can be illustrated by examining how far into the “diamond” one moves, whether within an organisation, a sector, or a country. Earlier in this chapter, we linked this to the normative justification for participation and to

different employment regimes. Empirical evidence suggests, for example, that participation tends to be more extensive in the Nordic countries, which are characterised by inclusive employment regimes and a combination of fairness and efficiency as underlying rationales.

Researchers at the European Trade Union Institute (ETUI) have developed the European Participation Index (EPI), which is based on three dimensions: (i) union density and collective bargaining coverage, (ii) workplace representation, and (iii) board-level representation. De Spiegelaere & Vitols (2024) find that the Nordic countries, Denmark, Finland, and Sweden, achieve the highest EPI scores, while the Baltic states (Estonia, Latvia, and Lithuania, with scores of 0.14, 0.15, and 0.22 respectively) and Bulgaria (0.19) rank lowest on the index (see also chapter 4).

At the same time, the index is less able to capture the situation of various groups of temporary workers, freelancers, and solo self-employed individuals, such as those engaged in platform-mediated work. This raises a timely question: are existing participation and voice mechanisms primarily designed to represent and protect core workers with secure employment (the so-called insiders), or do they also address the concerns of outsiders—such as those in precarious employment, as defined by Doellgast et al. (2018, p. 3)? As discussed further in chapter 6, many European trade unions have made efforts to represent precarious workers through collective bargaining and other strategies (Doellgast et al., 2018; Hyman & Gumbrell-McCormick, 2017; Keune, 2013; Mustchin & Lucio., 2017). And, as argued by Been & Keune 2022, also employers and their organizations may have an interest in counteracting precarization and downward spirals in wages and working conditions through collective agreements, including the issue of increasing numbers of self-employed workers as a particular form of flexibilization. Precarity may affect productivity and creativity negatively. In addition, one of the arguments of why employers traditionally favour multi-employer agreements is to increase stability and predictability, and to avoid poaching by taking wages and basic working conditions out of competition (Bulfone & Afonso, 2020; Streeck, 1989). Where the respective interests of unions and employers align, they are more likely to address flexibilization and marginal work in collective agreements.

In this context, it is noteworthy that Kahancová et al. (2020) find that the lack of representation, alongside limited autonomy, is one of the most significant factors contributing to the precarious situation of platform workers in Hungary and Slovakia.

Considering the presented dimensions of precarity, we conclude that the risk and source of precarity in on-demand platform work does not come from low income or irregular working time but is especially manifest in lacking autonomy at work and collective interest representation. On all other dimensions, precarity depends on sector-specific regulation and hidden risks, e.g., consumer rating for income or job security, or net incomes given the costs of engagement in the activity (Kahancová et al., 2020, p. 7).

So; representation matters. However, trade unions are not necessarily perceived as the most effective actors for representing workers. In a study of videogame workers, Dorigatti et al. (2023) found that turning to a trade union for support was often seen as a sign of failure. Instead, trade associations were preferred as vehicles for interest representation. This approach works well for the sector, particularly because it is not based on class divisions but rather on a shared professional identity. This form of interest representation primarily focuses on supporting the development and maturation of the videogame industry. These organisations, for example, engage in activities aimed at strengthening the capacity of videogame developers to remain competitive—such as organising fairs, promoting internationalisation, offering skills development initiatives—and representing the sector’s interests to public institutions, with the aim of influencing policies that affect or may affect the industry. Unlike traditional employers’ organisations and trade unions, these associations are not involved in collective bargaining (Dorigatti et al., 2023, p. 1267).

Another form of representation is the public sphere. Bethge (2025) investigates whether the dynamics of employee voice differ between online gig workers and traditional employees on employer rating platforms. Her analysis builds on Wilkinson’s definition of employee voice as “the ways and means through which employees attempt to have a say and potentially influence organisational affairs about issues that affect their work and the interests of managers and owners” (Wilkinson et al., 2020, in Bethge, 2025, p. 6). In line with Bethge (2025), one can argue that the domain of voice is expanding. She notes that “in contrast to traditional employees who typically rely on internal mechanisms like unions or direct communication with management, gig workers increasingly express their concerns publicly through online platforms” (p. 20).

Bethge argues that in sectors where traditional labour unions are weak or entirely absent, social media has emerged as a vital tool for mobilising campaigns that challenge unfair labour practices and advocate for improved working conditions. The visibility afforded by these platforms helps legitimise the concerns of non-standard and economically reliant workers, drawing attention from both employers and policymakers (Bethge, 2025, p. 21).

However, even when participation mechanisms are aimed at vulnerable workers, reaching them can be challenging. In a study involving interviews with 113 migrant workers across three sectors in Denmark, Borello & Hau (2025) show how precarious migrant workers build solidarity through multiple forms of identification that go beyond traditional class-based understandings.

They find that ‘migrants’ vulnerable labour market position and dependent relationships with employers can complicate, or even undermine, the emergence of workers’ solidarity’ (Borello & Hau, 2025, p. 5). Solidarity—essential for representative participation—is hindered by the migrants’ particular dependency on their employers, economically, structurally, and socially. Economically, they rely on their employers to support their families’ livelihoods in their home countries. Structurally, employers are often responsible for providing various legal documents, including contracts and paperwork required for obtaining legal identification and medical documentation through the Danish

Agency for International Recruitment and Integration (Borello & Hau, 2025, p. 14). Socially, employers frequently serve as migrants' only source of information about life in Denmark (Borello & Hau, 2025, p. 15). These conditions make it difficult for Danish workers to build solidarity across different groups.

Borello and Hau (2025) focus on workers in precarious situations, defined in the article as lowwage migrant workers in nonstandard work. Being in a precarious situation shares characteristics with being in a vulnerable position. Boonjubun et al. (2025) argue that vulnerability must encompass more than what has traditionally been included in the concept, namely migrants, minorities, the disabled and low-income families. Crises, such as the pandemic, have contributed to deepening existing vulnerabilities and revealing new ones. According to Boonjubun et al. (2025) we need to understand which dimensions are relevant from the standpoint of actions taken on behalf of the vulnerable. This is particularly relevant when discussing different forms of representation and voice for non-standard workers.

In this context, it is also interesting to note that Wilkinson et al. (2021) emphasise that within research related to workers voice, there is a tendency to treat employees as a homogeneous group, overlooking the diversity that exists among workers:

The scholarship on employee voice tends to treat workers as homogeneous and theorises about the voice vehicles in a universal way. Indeed, it is widely accepted that organisations are generally designed for and dominated by mainstream employees, e.g. white Anglo-Saxon, protestant, heterosexual persons in the UK, US, Canada and Australia (Greene, 2015). However, workers are diverse, and their opportunity or tendency to voice may be shaped by their gender, race, sexuality and personal perceptions in addition to institutional factors (Wilkinson et al. 2021, p. 717).

This means that certain voices may be absent or expressed in very different ways. For instance, Wilkinson (2018), referencing Syed (2014), argues that the presence of trade unions or employee committees is insufficient to address the needs of diverse groups such as women and ethnic minorities. Furthermore, Bell, Özbilgin, Beauregard, and Sürgevil (2011) find that LGBTQIA individuals often choose silence in the workplace—either to protect themselves from mistreatment or because they feel that speaking up would be futile. The result is that some voices go unheard and/or that there is a lack of appropriate mechanisms to amplify non-mainstream perspectives (Morrison, 2014).

To address such a challenge, Boonjubun et al. (2025) emphasise the need to view non-standard workers through intersectional lenses in order to reveal how power structures sustain or challenge inequalities, uncover overlapping vulnerabilities, and foster coalition-building. This implies that the interests and needs associated with having a voice or being represented may vary considerably. We return to this topic in Chapters 5 and 7.

Summary

This chapter synthesises a broad and multidisciplinary body of literature addressing three central questions: (i) why workers should participate in decision-making

processes, (ii) how such participation can unfold, and (iii) what we know about democracy and participation among different groups of workers.

The literature presents two overarching rationales: a rights-based justification rooted in democratic principles of fairness, justice, and equality, and an efficiency-based justification focused on organisational effectiveness. The rights-based perspective emphasises collective representation as a means to counterbalance asymmetrical power relations between labour and capital, drawing on traditions such as Power Resource Theory, Labour Process Theory, and participatory democracy. Scholars argue that workplace participation fosters democratic skills and political engagement, particularly among marginalised groups. Conversely, the efficiency-based rationale views participation as a strategic tool to enhance motivation, communication, and productivity, often framed within Human Resource Management and Organisational Behaviour traditions. While these perspectives differ in emphasis, recent research suggests that combining fairness and efficiency can yield positive outcomes for both workers and organisations.

How participation and voice unfold is, among other things, a result of how the two underlying rationales, fairness and efficiency, are balanced against each other. Within inclusive employment regimes, the strength of the workers' side contributes to reducing the initially asymmetrical power relations. In contrast, in countries characterised by market-based regimes, the efficiency argument tends to dominate. Here, workers' participation and influence largely depend on whether employers perceive value in inviting employees into decision-making processes. In dualist regimes, insiders may have access to well-established channels for participation and influence, whereas outsiders—such as workers in non-standard employment—are often excluded from these mechanisms.

Furthermore, participation varies in terms of degree, form, timing, coverage, domain, and topic. These variations may cut across employment regimes and national contexts. It ranges from weak forms, such as being informed post-decision, to strong forms involving negotiation and co-determination. Participation may be formal, informal, or a combination of both, with evidence suggesting that dual engagement enhances perceived influence. The timing of involvement, whether before or after decisions are made, significantly affects outcomes. Coverage is a critical dimension, as mechanisms often exclude non-standard workers, raising concerns about equity. Topics of participation span operational, tactical, strategic, and increasingly, well-being-related issues. Domains extend from team-level decisions to national and sectoral social dialogue, underscoring the multi-level nature of workplace democracy.

Empirical studies reveal significant variation across employment regimes. Inclusive regimes, such as those in Nordic countries, tend to integrate both fairness and efficiency rationales, resulting in higher levels of participation. However, mechanisms often fail to adequately represent non-standard workers, including migrants, platform workers, and freelancers. These groups face structural, economic, and social barriers to participation, and may rely on alternative forms of representation such as trade associations or public platforms. Moreover, the literature highlights the need to recognise worker diversity, noting that mainstream participation structures may not address the specific

needs of women, ethnic minorities, and LGBTQIA individuals. Silence, exclusion, and lack of tailored mechanisms remain challenges to inclusive workplace democracy.

This also makes it pertinent to ask whether those who wish to work towards a more inclusive working life are aware of the diverse interests these workers hold. Some may have an interest in joining a trade union that works, for example, to secure them a permanent fulltime position. Others may benefit from engaging in selfexploitation, at least temporarily, either to improve their position in the labour market or because they wish to maximise profit in the shortest possible time. As Borello and Hau (2025) point out, migrant workers value solidarity, but in ways that differ from native workers. This underscores the need for a bottomup perspective, something this study aims to contribute to.

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4 Industrial relations regimes, employment regimes and social dialogue in non-standard work in Europe

Kristin Alsos, Fafo

In this chapter we give an overview of literature shedding light on how national and sectoral industrial relation (IR) systems and employment regimes affect the various types of social dialogue (SD) in general, but with a focus on the representation and inclusion of NSWs. The main focus is the capacities of SD embedded in different industrial relations and employment regimes to respond to NSWs interests. We will also give a short overview of the variation of IR/ER regimes.

Social dialogue is often studied in light of how actors' access to power resources. Korpi (1978) defined power resources as 'the properties of an actor that provide the ability to reward or punish another actor'. The theory is rooted in the idea that workers can protect their interests by collectively building power resources to contest the asymmetrical and imbalanced power dynamic between capital and labour or to influence political decisions on the regulation of the labour market and the welfare state. The potential for building collective power resources (Olsen 1965), or union action (Ibsen 2024), will vary dependent on the IR/employment regimes in place.

IR regimes include the role of trade unions and employer organisations, as well as the power relations between them, while employment regimes refer to employment levels, employment rights and safety nets affecting the differences between employment statuses. Collective bargaining is the main regulatory instrument of IR and has an inherent equalising effect, as the aim is to introduce common standards for workers and employers (Dorigatti & Pedersini (2021). As pointed out by Dollegast and Benassi (2014) "[t]he distinctiveness of collective bargaining lies in this role as an institution that involves formal negotiations between two organizations representing employer and worker interests and holding different forms of political and economic power" (p. 228). Within industrial relations, representation of interests is central in order to deal with the inhibit power imbalance between labour and capital. But as Meardi et al. (2019) argues "only rarely has 'representation' been at the forefront of industrial relations reflection" (p. 44).

Traditionally, the legal frameworks for social dialogue include workers in employment relationships, i.e., in a position of subordination or, in some jurisdictions, dependency. Davidov (2004) argues that the applicable industrial relations legislation which regulates workers' collective rights is often either not responsive enough or fails to cover certain categories of workers. Workers who operate independently as self-employed, however, are often excluded, as they are not considered to be in a position of subordination or dependency. Instead, they operate in the market as undertakings, and as such the purpose and mechanisms of social dialogue are not suitable. A binary divide between subordinate or dependent workers/employees and independent workers/self-employed

is therefore deeply rooted in the legal institutions governing social dialogue. NSWs in business models in the new world of work obscure the binary divide, as they often do not fit well into either category. Zero-hour contracts and platform work are examples of work relations often characterised by legal ambiguity concerning the correct legal status as workers/employees or self-employed (Freedland & Kountouris 2011; Hotvedt et al. 2020). As pointed at by OECD (2019) regulations there might be a need to extend collective bargaining rights to workers and self-employed who share vulnerabilities with employees (see chapter 6).

The countries covered by this literature study, belong to different IR and employment regimes. The politics, structure and regulations of social dialogue, both at firm level and industry or national level vary and will be expected to affect the inclusiveness and effectiveness of social dialogue. At the same time scholars have identified similarities between industries belonging to different kind of regimes (Bechter et al. 2012). In this chapter we will first focus on literature that relates to different regimes, but also sector similarities across borders. We will then look more closely into different models for firm level representation. In the literature covering IR regimes, there are several contributions investigating trade union strategies and actions towards non-standard workers. This literature is covered in chapter 6.

Typologies of Industrial relations regimes and employment regimes

European industrial relations and employment systems vary widely, and over the years several authors have provided systematic classification of the institutional framework of industrial relations (e.g. Clegg 1976, Visser 2009; ETUI 2012, Bohle and Greskovits 2012, Eurofound 2016, GwadarSKI & Towalski 2019). We will not cover all these in detail, but our starting point is the Visser typology as this has been widely used in industrial relations research.

Visser (2009) distinguishes between five IR regimes: Nordic organised corporatism, Social Partnership (mostly developed in continental Western Europe), Liberal Pluralism originating in Ireland and the UK, a Polarized or State-centred regime found in Southern Europe (here represented by the State centred/organised corporatism of Italy) and the Fragmented state-centred regime of the Centre-East (Ebbinghaus and Visser, 1997).

The Nordic countries have traditionally featured "organised corporatism" characterised by centralized social dialogue with strong national and sectoral bargaining and cooperative industrial relations. Peak-level agreements and tripartite consultations are common, alongside high union density, broad collective bargaining coverage and institutionalized worker voice (e.g. union-based works councils and shop stewards).

Continental Europe's corporatist-conservative or "social partnership" regimes traditionally feature industry-wide collective bargaining, significant coverage (often via general extension of sector agreements), and institutionalized consultation (e.g. works councils) (Gardawski & Towalski 2019). However, since the 1990s, many have experienced decentralization pressures and declines in union membership and bargaining coverage. Despite these challenges, continental countries still often use national social pacts or tripartite agreements in times of crisis or reform (e.g. the frequent "social pacts" in

Belgium or the Netherlands, and periodic national accords in Germany, France, Italy). Sectoral bargaining remains the backbone, but firm-level bargaining has gained importance for competitiveness, sometimes at the cost of inclusiveness (Keune 2013).

Southern European countries are often described as state-centred regimes, with relatively polarized labour relations and the state playing a strong role in arbitrating or legislating outcomes. Union density is moderate (but with a strong tradition of mobilization, e.g. general strikes), and employer associations vary in strength. Collective bargaining is usually organized by sector or branch, but with greater legal extension of agreements and frequent state intervention.

The liberal Anglo-Saxon model is characterized by market-driven employment relations, low union density (especially in the private sector), and collective bargaining coverage. The UK and Ireland have voluntarist traditions – in the UK, collective bargaining happens mostly at the firm or workplace level. There is little coordinated sectoral or national bargaining. Social dialogue is thus weaker and more fragmented: no legal extension of agreements, and unions must organize and bargain workplace by workplace. This regime offers high flexibility for employers, but that often translates to a high incidence of non-standard work and weaker protections. Indeed, the UK saw an expansion of zero-hours contracts, agency work, and gig/platform jobs over the last two decades. Fewer than one in three UK employees is now in a standard full-time permanent job with union coverage (Eurofound 2020). This poses a major challenge for social dialogue: many NSWs are in sectors with no union presence or multi-employer agreements. One major hindrance for NSWs is their limited attachment to a single workplace or an employer. In IR model as the liberal, where firm level bargaining is the rule, this represents a major obstacle to representation (Wills 2009, ILO 2011).

Central and Eastern Europe (CEE) are classified by Visser (2009) as a fragmented state-centred model, often with low union density, fragmented employer associations, and underdeveloped multi-employer bargaining. In most CEE countries, national tripartite councils exist (for social dialogue on policy and minimum wage consultations), but sectoral bargaining is weak or virtually absent except in certain industries or public sector. According to this typology, collective agreements predominantly occur at company level, and many firms (especially multinationals) import practices from Western Europe. As a result, only a small minority of workers is covered by collective agreements in many of CEE countries. As we will return to below, others argue that this generalised picture does not take into account the great variations between these countries (Bohle & Greskovits 2012). Thus, formal social dialogue is in some of these countries limited to the tripartite level where unions lobby for worker-friendly labour code provisions, while workplace dialogue remains uneven. Slovakia is one example of this development. Kahancová et al. (2019) describes how a model of peak-level social pacts has been replaced by a tripartite advisory committee to the government. Where challenges earlier were solved through collective bargaining, one has later turned through legislative solutions. However, the social partners still have an important role to play in shaping these regulations through different strategies and channels.

IR can be seen as governance of employment relations (Sissons, 2010). Visser (2008) combines his IR regime typology with Gallie's (2007) classification of employment regimes, to investigate whether different regimes lead to distinct outcomes for social dialogue for NSWs with regards to the quality of work. Gallie distinguishes between inclusive employment regimes where the participation of organised labour in decision making is strongly institutionalised. Here, policies are designed to extend both employment and employment rights widely. In dualistic regimes participation is more consultative, and here employment rights are mainly given to the core workforce. These countries historically have had stark labour market dualism: a core of well-protected permanent workers versus a periphery of temporary, seasonal, and informal workers with minimal security. Spain, for example, has long had one of Europe's highest temporary employment rates.

The liberal/market-based regimes leave employment levels and job rewards to market regulation, and organised labour plays a marginal role. Here, the distinction between insiders and outsiders in relation to job quality is less clear. Based on this, job quality would be better in the Nordic countries, than in the two others (Gallie 2007).

Table 4.1 Typology of industrial relation regimes and employment regimes in Europe

Regions	North	Centre-West	South	West	Centre-East
Countries included in the project	Denmark, Norway	Belgium, The Netherlands	Italy	Ireland, UK	Slovakia
IR-regime	Organised corporatism	Social partnership	State centred/organised corporatism	Liberal pluralism	Fragmented state-centred
Employment regimes	Inclusive	Dualistic		Liberal/Market	
Power balance	Labour oriented	Balanced	Alternating	Employer oriented	
Principal level of bargaining	Sector			Company	
Bargaining style	Integrating		Conflict oriented		Acquiescent
Role of social partners in public policy	Institutionalised		Irregular/ politicised	Rare/event-driven	Irregular/ politicised
Role of state in labour relations	Limited (mediator)	'shadow of hierarchy'	Frequent intervention	Non-intervention	Organiser of transition
Employee representation	Union based	Dual system	Union based	Union based	Variable

Source: Visser (2008, 2009), Gallie (2007)

While most authors agree that IR models with multi-employer bargaining are more successful securing job quality outcomes for NSWs, several challenges can be identified. The temporary attachment to a single establishment, that characterise many NSWs can make it harder for them to be included, not only if they move between sectors (Bosch, G. 2010), but also between different forms in the same sector (Svalund & Alsos 2021).

Challenges with typologies and alternative clustering

A key limitation of typologies is that they mask substantial variation within clusters. As Visser argues, 'the real world is messier than these typologies and the application to single countries is an approximation at best'. Moreover, institutional developments since the 2008 financial crisis raise questions about whether the original typologies remain fully appropriate for all countries. The classification of Centre-East European countries has been criticised for oversimplification. Significant institutional differences exist, for example, between Poland and the Czech Republic, and between Slovenia and the Baltic states (Gardawski & Towalski, 2019; Crowley & Ost 2001). Bohle and Greskovits (2012) make a distinction between three forms of capitalisms in these countries: neoliberal in the Baltic states (and similarities in Romania and Bulgaria), embedded neoliberal in the Visegrad countries (and Croatia) and neocorporatist type in Slovenia. The neoliberal regime in the Baltic states limits the political influence of citizens and social groups on policymaking, while the embedded neoliberal regimes in the Visegrad states are looking for compromises between market transformation and social cohesion, making them more inclusive. Lastly, Slovenia is seen as the most generous in relation to those who lose out in the transformation to the market economy. Here you find multilevel, negotiated relationship between the state, labour and capital, and search for compromises. This variation suggests that the grouping made by Visser masks important divergences in industrial relations structures.

Gwadarski and Towalski (2019) have provided a different typology based on 19 input and output variables covering both institutions and the quality of work and employment, as employment rate, forms of employment or labour costs. The authors have identified four different clusters of countries.

- (1) Anglo-Saxon cluster encompassing UK and Ireland, and characterized by decentralized collective bargaining with low coverage, and a low share of workers in standard employment. These countries have high employment rates, low employment protection and the highest labour productivity in the sample.
- (2) The Continental model cluster comprising most West, South and North-European countries except Portugal and Greece. All countries in this cluster have high collective bargaining coverage, and also other characteristics of strong industrial democracy. Although union density varies between these countries, other institutional arrangements such as work councils indicates that the industrial democracy is strong. Further, these countries have high share of employment by low skilled workers and small share of precarious workers, low unemployment etc. what the authors label as a "solidaristic face". Notably, this cluster spans multiple of Visser's original regime groups, indicating greater cross-country convergence than traditional typologies allow.
- (3) The Statist cluster includes Greece, Portugal, the Czech Republic, Poland, Croatia and Slovenia. Their industrial democracy is considered weak with low union density and weak forms of employee representation and collective bargaining. Thus, the state exercises its power, often autonomously. Representative social partners are often absent and multi-employer bargaining weak. Further, employment levels are low, as well as quality of jobs and labour productivity.

(4) The last cluster, the Deregulated model, comprises the other seven CEE countries. Here, the industrial democracy is even more underdeveloped than in cluster (3). The countries have a small share of people on temporary contracts, but low employment protection makes it easy to 'hire and fire' workers. Further characteristics include low employment rate, high rate of precarious work and low level of low skilled workers in the labour force. The authors sum up this cluster the following way: -the economies making up cluster 4 have undergone a far-reaching decentralization of the relations between employers and employees, while at the same time the state has not aspired to assume an active role in industrial relations' (p. 96).

While this typology offers a more accurate picture of CEE states, it does also feature simplifications in some areas. For instance, it overlooks some factors that are useful in an analytical framework for assessing the inclusiveness of social dialogue, eg. The willingness of the state to set up corporatist structures, and the capacity of trade unions to mobilise workers. Another example would be the measurement of industrial democracy, where the collective bargaining variable and the employee representative variable encompass a wide diversity of institutional characteristics. For instance, Danish collective bargaining coverage is largely based on union activity at company level, which could be expected to facilitate more firm-level initiatives compared with companies covered only by an extended collective agreement. Furthermore, the level at which employee representatives are present, as well as the overall unionisation rate, would also be important. Ibsen et al. (2017), analysing workers in Denmark, show that there is a positive effect of workplace union density on the likelihood that new employees join unions—an important factor for increasing associational power (Traxler et al., 2021). They find a significant acceleration at around 45–65 per cent workplace union density. But, as Ibsen (2024) points out, associational power is not based on union density alone, but also on the ability to mobilise non-members.

There are also contributions arguing that recent changes have made national models drift in the direction of other regimes. Sippola et al. (2024) compare the continental Dutch model with the Nordic model using the regulation of variable-hours contracts as a case. They find that the Dutch bargaining process was more dynamic than the Finnish one. They explain this by the commitment of the tripartite body, the social partners' Labour Foundation (STAR). In Finland, autonomous bargaining between the social partners failed to protect workers with variable-hours contracts; instead, negotiations were shaped by the perceived need for greater employer flexibility, and decentralisation of collective bargaining made it difficult to improve protection through sector-level agreements. Rather than collaborating through tripartite or bipartite institutions, the social partners sought to push their agendas independently into state legislation. The authors argue that the Finnish case resembles the Irish liberal labour market regime with weak unions, moving away from the Nordic model, while the Netherlands is moving in the opposite direction.

There is considerable variation between different IR regimes in terms of bargaining coverage, depending on employer and union density, bargaining models, and the use of extension mechanisms (OECD/AIAS, 2025). However, there is not necessarily a direct link between coverage and levels of equality between different groups of workers, as

access to power resources varies between unions in different countries and sectors, giving some unions a stronger position vis-à-vis employers than others. How IR regimes are constructed is therefore crucial for explaining different job quality outcomes. For instance, coordination between bargaining areas and solidaristic wage bargaining—as found in the Nordic regimes of organised corporatism—support unions with limited power resources, often those representing a relatively high share of NSWs. This is not the case in more decentralised regimes such as the UK, where bargaining is not coordinated (Doregatti & Pedersini, 2021; Alsos & Nergaard, 2021).

Sector differences and cross-country similarities

Bechter et al. (2012) demonstrate a significant disconnection between national industrial relations systems and sectoral-level industrial relations. Their analysis, which compares sector indicators against the Visser/European Commission (2009) typology, shows that several sectors in different countries would fit better within the “Organised Corporatism” model typically associated with the Nordic region. Examples include the steel industry in Poland and hospitals and railways in the UK. According to their analysis, only in Austria and the Netherlands do sectoral patterns fully mirror the national industrial relations model of social partnership, while only Portuguese sectors consistently resemble the state-centred Southern European model. Bechter et al. argue that sectoral and national levels do not replace one another; instead, ‘both levels are equally important’ (Bechter et al., p. 199).

Keune and Pedaci (2020) similarly find that, across seven European countries, national institutional contexts play a limited role in shaping trade union strategies against precarious work in construction, industrial cleaning and temporary agency work. Their findings align with Bechter et al. (2012) by demonstrating that sectors exhibit notable similarities across national borders. In their analysis, unions’ power resources emerge as the decisive factor shaping strategies. At the same time, unions operating in weaker sectors—such as cleaning—may utilise power resources from stronger sectors or from the national level (Keune & Pedaci, 2020).

When Meardi et al. (2019) study representation, they find that ‘*deeper roots*’—where organisations claim to be more genuine—and ‘*new voices*’—where traditional unions are challenged by emerging organisations representing groups marginalised in large trade unions—are common in the pluralist representation systems of liberal and Mediterranean countries, but appear to be rare in corporatist countries.

Bechter et al. (2012) point to the Nordic countries and Austria as cases where national models remain visible at the sectoral level. However, even in the well-regulated Nordic countries, cracks in the inclusive model have been identified. Alsos and Trygstad (2019), examining representatives’ participation in Norwegian companies covered by collective agreements, found substantial variation between firms in manufacturing and those in private services. In parts of the private services sector, it was difficult to identify the Nordic micro-model, which is characterised by close cooperation between management and company-level union representatives. A key challenge for union representatives in the service sector was low union density, which reduced their power vis-à-vis the employer.

Furthermore, several contributions have shown that the Nordic model struggles to regulate platform work. Oppegaard (2025) argues that this is not the result of a weakened IR system or labour-market deregulation, but rather that platforms exploit the *fringes* of the Nordic labour-market model. By this he refers to parts of the labour market that are not fully institutionalised. López et al. (2024) investigate how even workers at the *fringe* can use the institutional framework for collective representation as a power resource, but note that these power resources are frequently contested and circumvented by employers. The challenge, therefore, is to maintain their position, as the institutional framework contains loopholes.

An opposite example can be found in the UK, where more is left to market regulation. Simms (2011) addresses the general problems of the UK industrial relations system in improving the situation for vulnerable workers, due to low bargaining coverage and low union density, particularly in sectors with high levels of precarious work. At the same time, there are some sectors with long-established bargaining traditions, such as performing artists and nurses. In these sectors, unions have succeeded in organising and regulating precarious work and in extending coverage to new forms of work. One example of the latter is the transport unions, which have begun recruiting members and extending collective bargaining to more precarious groups of workers in the transport sector—for instance, cleaners on the London Underground.

So, how do different IR and employment regimes affect the quality of work? In a literature review investigating inequality between capital and labour and among wage-earners, Keune (2021) finds that increased inequality is related to low bargaining coverage and low union density. Keune argues that four factors help explain this correlation. One of them concerns representation, and whether unions represent only insiders or also outsiders. NSWs will less often be union members, and if unions represent only their members, they may have little interest in combating low wages. However, Keune finds evidence in the literature that many European unions have sought to include the interests of precarious workers in collective bargaining as well as through other strategies. In addition to motivations of social justice and solidarity, unions may also act because employers can use precarious workers to put pressure on insiders' wages and working conditions. Keune finds that ideas of social solidarity and equality are strongest in the Nordic and southern European countries and weakest in the Anglophone countries (with reference to Rosetti 2019). As Keune points out, the same applies to employers, as one argument for multi-employer bargaining is that it prevents low-wage competition.

The limits of the collective bargaining model are observed by Been and Keune (2022). They examine regulatory changes and developments in marginal part-time work in comparison with other forms of non-standard work in the Dutch cultural and creative industries. They identify substantial variation across subsectors with regard to centralized, marginalisation, and the responses of collective bargaining actors. This is due not only to the absence of collective agreements in many subsectors, but also to the fact that measures to counteract poor working and living conditions are included in collective agreements only when the social partners reach consensus. However, in industrial relations systems with strong institutions, issues that collective bargaining actors fail to resolve can be raised in other institutional arenas. Keune (2015) illustrates this in relation

to unions' efforts to improve collective agreements for non-standard workers, but this can also be relevant for labour markets as such. Where unions are not sufficiently strong, or where bargaining coverage is limited, they may turn to tripartite institutions or legislators to push for change (Trif et al., 2023; Kahancová & Martišková, 2022). Yet this strategy is less effective in responding quickly to emerging forms of precarious employment—creating opportunities for *regime shopping*.

In a study of interest representation in the videogame industry in Denmark, Italy and the Netherlands, Dorigatti et al. (2023) analyse how representation is shaped by national and sectoral contexts. In line with other contributions, they find that traditional industrial relations actors play only a limited role for companies and workers in any of the three countries. One explanation offered by trade unions is the difficulty of recruiting members. However, even in Denmark, where union density is relatively high in parts of the sector, this does not appear to be reflected in trade union activity. In all countries, sector-level collective agreements are absent. The authors find that, in place of traditional actors, professional organisations, trade associations and informal communities that help develop occupational identities are more important. On the one hand, this study confirms Bechter et al.'s (2012) argument regarding cross-national sectoral similarities. Nonetheless, the differences in union density between the countries may suggest that both unions and workers in Denmark are better positioned than those in the other two countries to mobilise representation, as the formal structures are in place.

Firm-level representation models

Until now, we have mainly addressed institutions at national and central level, and to a lesser extent firm-level institutions. In Table 3.1, Visser distinguishes between union-based systems (North, South and West), dual systems (Centre-West) and variable systems (Centre-East). Among the union-based systems there is considerable variation in coverage. Employer representation is high in the North and South, but more fragmented in the voluntarist model of the UK and Ireland, as well as in the Centre-East. Nevertheless, the gaps have narrowed due to EU regulation in this area (Visser, 2009).

Even within these main categories, there is substantial variation in systems for workers' representative participation at workplace and firm level, and in the existence of board-level employee representation. This includes different combinations of institutions and actors, such as trade unions, works councils and board-level employee representatives (Haipeter, 2024).

De Spiegelaere et al. (2024) have developed an Employer Participation Index (EPI) based on three dimensions: board-level employee representation, workplace representation and collective bargaining. The country-level EPI ranges from 0 (no collective worker representation) to 1 (the highest level of participation across all three dimensions). Based on these dimensions, the Nordic EU countries score highest (0.84–0.87), while many CEE countries and the UK have low scores. This aligns with what one would expect from the IR regime clusters developed by Visser. However, the findings also diverge from these expectations. Slovenia, the Slovak Republic, Croatia and Hungary all have scores above 0.5, explained by the presence of board-level employee representation. The index also shows differences between the UK and Ireland, with an EPI of 0.25

in the UK and 0.45 in Ireland, where board-level representation appears to be decisive. De Spiegelaere et al. (2019) have also analysed the different elements of the institutional framework of democracy at work, referred to as *the diamond of democracy at work* (see Chapter 3).

Nienhüser (2014) provides an overview of different forms of works councils. In line with Rogers and Streeck (1995: 6), he defines works councils as ‘an institutionalised, representative body – one that represents the interests of all employees of a company to its management’ (p. 248). He excludes voluntary bodies established at the initiative of managers, as well as councils with a narrow topical focus, such as HSE committees. Under this definition, he includes bodies in which only employees are represented, joint committees involving employers, and institutions in which unions are represented.

In the literature, a distinction is drawn between single-channel and dual-channel representation. There are two types of works councils that can be described as single-channel. The German model, in which works councils are the only, or at least the dominant, body of interest representation, is an example of a non-union body at establishment level. In the Nordic single-channel model, employee representation takes place through a union body. Sweden is used by Nienhüser (2014) as an example of this model, but it can also be found in countries outside the Nordics, such as Cyprus. The final type, dual-channel representation, implies that countries have both union representation and non-union representation at firm level, with France as a key example.

Works councils can also be clustered according to the rights they hold. Drawing on Visser (2012), European countries are placed in different categories based on the rights of works councils (see Table 4.2). Visser’s categorisation includes councils in which unions are the sole body of representation.

Table 4.2 Cluster of work councils

Rights of work councils	Countries
No or only information rights	UK, Estonia
Social rights only	Czech Rep., Spain, Italy, Poland
Economic and social rights – consultation	Belgium, Denmark, Finland, France, Hungary, Lux., Norway, Sweden, Slovenia, Slovakia
Economic and social rights – incl. codetermination on some issues	Austria, Germany, Netherlands

Source: (Nienhüser 2014 based on Visser 2012)

Based on the rights that representatives hold and the resources available to them—such as time to carry out their tasks, training, and networks within the local environment—Dufour and Hege (2013) argue that the more generous rights in dualistic countries give employees a better chance of being heard, provided the local environment is favourable.

Nienhüser (2014) finds, when comparing Germany, Sweden and France, that differences in the incidence of works councils are partly explained by the thresholds required for establishing them and whether their establishment is mandated by law. Similarities relate to the types of issues discussed and whether these are subject to consultation or codetermination.

Although elections are the main method for appointing representatives across different models, there are exceptions. Dufour and Hege (2013) note both appointment by external unions (as in France) and designated quotas of union nominees (as in Italy). Entitlement to vote also varies. In most single-channel systems, elections involve only unionised workers, but Italy is an exception: there, as in dual-channel countries such as France and Germany, all workers are entitled to vote (Dufour & Hege, 2012).

In a comparison between German and Dutch works councils, van den Berg et al. (2019) find that union membership is higher among council members than in the wider workforce in both countries—particularly in Germany. They also find that members of German works councils generally have a closer relationship with unions, whereas Dutch members tend to focus more on interaction with management. Dutch councils appear to operate more informally (with Germans engaging in more meetings and written communication), and Dutch representatives tend to reach agreement with management, share more information, and express greater satisfaction with this relationship. Regarding the topics covered and the risk of conflict, there are no major differences between the two countries: both models favour cooperation.

There are differences between industrial relations regimes in the extent to which works councils are widespread. They are more likely to be found in coordinated market economies (Hall & Soskice, 2001), and Nienhüser explains this through the co-evolution of institutions: works councils have developed alongside other institutions such as collective bargaining systems and labour law. This is also related to whether the imbalance between labour and capital is perceived as a problem or regarded as something that can be regulated by the market. Nienhüser (2014) further argues that works councils are more likely to be found in countries where unions play a lesser role within firms and where wage bargaining is more centralised, while in countries where wage bargaining mainly takes place at company level, such as the UK, works councils are absent. One may add that union-based works councils are also found in countries with multi-employer bargaining models. According to Nienhüser, research on the effects of works councils remains inconclusive.

There are also comparative studies that investigate the inclusiveness of social dialogue in countries with different institutional frameworks for representative participation and voice.

Grimshaw et al. (2017) identify three types of representation gaps. The *institutional gap* concerns the absence of unions or works councils and the lack of effective social dialogue at firm, sector or supply-chain level. The *eligibility gap* refers to situations where certain employment characteristics (e.g. contract type) limit access to particular forms of representation. The *involvement gap* represents situations where unions or other bodies are less likely to include or represent certain groups of workers. They

analyse these gaps in six countries belonging to different IR regimes: Germany, Denmark, Spain, France, Slovenia and the UK.

They find that even though the institutional frameworks differ—particularly regarding works councils, where unions do not have a statutory role—unions nevertheless play an important part in workplace representation in all the countries studied. In Denmark, workers are mainly represented by unions. In countries with works councils (Germany, Spain, France and Slovenia), unions dominate these bodies even when they operate formally separately from unions. This aligns with Heery's (2009) interpretation of Towers (1997), who argued that a key to the success of German works councils was their integration with union-based representation. Towers maintained that a critical issue for works councils is that they must not undermine union-based arrangements if the aim is to build stronger worker representation.

Heery (2009) summarises research on non-union representation in Britain and other Anglophone countries. Several studies find that workers benefit from a combination of union and non-union representation, while others find that non-union representation displaces unions. Heery argues that this divergent pattern depends on union strategies, the behaviour of other actors, and contextual circumstances.

As Grimshaw et al. (2017) show, unions remain the most common form of workplace representation in the UK. However, the importance of unions even in Germany and other dual-channel countries indicates that works councils cannot fully compensate for declining union density.

The authors analyse the inclusiveness of representation structures with respect to the workers covered, including across sectors, firm sizes and non-standard workers. They find the Danish and French models to be the most inclusive in terms of collective bargaining coverage and the presence of workplace information and consultation. The UK performs poorly on all these dimensions, while Spain and Slovenia show high collective bargaining coverage and medium levels of workplace representation. Germany exhibits moderate bargaining coverage and weak workplace representation.

When it comes to the inclusiveness of NSWs, several issues arise: part-timers and mini-jobbers may find participation in works councils hampered by irregular working hours; agency workers may struggle to participate in elections of workers' representatives because their placements end; subcontracted workers may not be covered by representation; workers' representatives often have minimal legal rights to information about subcontractors; temporary work agencies may not be covered by collective agreements; and unions face difficulties in reaching and unionising NSWs. These findings largely reflect a top-down perspective, as do many union initiatives aimed at closing involvement gaps.

Furthermore, the authors note that exclusions are strongly shaped by legislation, for example, thresholds for establishing works councils, and by labour-market structures, such as the uneven presence of collective institutions across industries. New types of employment have created additional blind spots in representation, and as a

consequence unions often lack knowledge about the wages and working conditions of NSWs.

As with industrial relations regime typologies, workplace-representation typologies are also challenged by studies showing sectoral similarities across countries, as well as findings that differences between firms within the same sector may be greater than differences between sectors (Dufour & Hege, 2013). They argue that four common principles are decisive for the quality of workplace representatives. Because these principles can be found within each national model, they are not tied to any particular institutional configuration. They therefore conclude that institutional effects are of secondary importance and that institution-centred approaches overlook what they call the “representative logic”. The four principles are: the capacity to foster relationships; task selection or the privilege of taking the initiative; experience and the capacity to transform it into action; and external relations (Dufour & Hege, 2013). These can be understood as power resources operationalised in different ways (see, for instance, Arnholtz & Refslund, 2024; Korpi, 1978).

Summary

Diversity in national, sectoral and workplace IR structures and employment regimes shapes how NSWs are integrated into social dialogue and the outcomes in relation to job quality. Inclusive, coordinated regimes with high bargaining coverage and strong workplace representation provide better structural conditions for integrating workplace-bound NSWs and limiting low-wage competition. Liberal and fragmented regimes face greater structural obstacles. National institutions establish the floor of inclusion, but sectoral dynamics determine where challenges emerge and how acute they become. However, national regimes may, e.g. through coordinated and solidaristic wage bargaining, support unions with weaker power resources, often those representing sectors with high shares of NSWs. Regimes with centralized firm-level bargaining, low union density, and weak workplace representation, struggle to include NSWs and may produce widening inequalities. However, the relationship is not linear. The literature on Nordic regimes illustrates that even strong corporatist regimes face difficulties regulating NSWs. Non-workplace bound NSWs, such as platform workers, challenge traditional IR structures more fundamentally, while the binary divide between the employee and the self-employed may create loopholes, especially where the national systems are tightly coupled to the standard employment. Because representation systems are often built around identifiable employers and workplaces, workers operating through digital platforms fall outside existing channels of social dialogue.

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5 Non-standard work and business models

Lisa Dorigatti, Anna Mori, and Roberto Pedersini, University of Milan

The use of non-standard work has become common practice across sectors and different types of firms. According to our analytical framework, we can classify business models according to the ways in which firms use standard work and we assume that these distinct patterns can influence the viability, content and effectiveness of collective representation of non-standard workers.

The first distinction that we introduce to identify business models is between those which rely on NSWs as a core element of their organization (CORE) and those which include NSWs as a peripheral component (PERIPHERY). NSWs was originally regarded as the exception (non-standard!), but, as the previous widespread restrictions on the use of NSWs were lifted and the available forms of non-standard work multiplied, it has progressively become a more stable option and can now even represent the 'standard' for some business models. The second dimension that we developed to identify business models refers to the type of coordination mechanism used to integrate work within the enterprise. We distinguish between traditional hierarchical forms of coordination (HIERARCHY), where NSWs are recruited through subordinate employment contracts, from market-based organisational forms (MARKET), where NSWs are essentially represented by self-employed, freelancers or hired via subcontracted services. Moreover, we added a coordination mechanism based on algorithms (ALGORITHM), which could be used in different organisational environments, including both subordinate and independent employment. The combination of these two dimensions provides a suitable framework to investigate how different business strategies can affect the scope, features, and outcomes of collective representation. Our assumption is that business models are defined through a combination of institutional factors, sectoral and market characteristics, and entrepreneurial agency. Therefore, although there could be a common pattern across countries and sectors, depending on the specific institutional and market circumstances, we expect to find a significant role of individual business strategies in shaping employment relation involving NSWs, which could provide relevant insights on the issue of effectively integrating NSWs in social dialogue.

In line with the chronological development of the use of NSWs, the classical utilization of NSWs, as identified by the existing and early literature, used to be contingent and ad hoc, aimed at covering short-term leaves of regular workers (Lautsch, 2002). However, in more recent times, non-standard work started being used by companies in a more stable manner in order to reach different, permanent goals. Among them are Doellgast, Batt, and Sørensen, 2009; Jaehrling and , 2013; Benassi and Kornelakis, 2021:

- lower employment costs, as non-standard workers are often paid lower wages, do not accrue seniority premia, and do not enjoy fringe benefits (such as health insurance or pension plans);

- avoid administrative responsibilities and HR-related costs, in the case of temporary agency workers (such as recruitment);
- implement numerical flexibility: non-standard work can be used to adjust staffing levels in response to changes in demand or revenues, externalizing market insecurity onto workers;
- screen workers before permanent employment;
- acquire scarce skills and deal with labour shortages;
- strengthen power and control over workers, changing the power balance between workers and employers by giving the latter more freedom to rescind the employment relationship and stronger capacity to use competition to discipline workers;
- circumvent labor regulations and reduce companies' responsibilities towards workers.

Some authors even argued that non-standard work might be used in order to follow dominant ideas, without much capacity from organisations to actually ascertain the ultimate benefits of these forms of employment.

The literature has also highlighted the disadvantages of contingent work, exploring the potential costs organizations incur when using NSWs. It needs to be kept in mind, in fact, that for most of the post-WWII period, the dominant strategy of organisations (reflected also in the theories developed by employment relations scholars) was not externalization, but internalization. Organizations used internal labor markets and offered workers continued, regular, full-time employment in order to acquire stable pools of firm-specific skills, control the workforce, create loyalty and attachment on the part of their employees (Doeringer & Piore, 1971; Kalleberg et al., 2003). One can, therefore, read the disadvantages of NSWs by contrasting them with the advantages of internal labour markets. In particular, non-standard work might cause:

- a lack/inadequate provision of firm-specific skills and reduce the propensity of both workers and companies to invest in training;
- a lack of loyalty, attachment, trust and commitment;
- higher transaction costs connected to the management of a transient and unstable labour pool;
- lack of full control over the employment relationship;
- reduction in innovation capacity.

Combining these elements, typologies of the companies' use of NSW have been developed. Among them are traditional frameworks, such as the dual labor market model (Doeringer & Piore, 1971), the flexible firm model (Atkinson, 1987), and the employment subsystem framework (Osterman, 1985). All those frameworks tended to predict the use of NSW for unskilled, non-core activities, which are not associated with major disruptions connected with high turnover rates. In fact, in these perspectives, the importance

of specific skills for the business objectives creates a mutual interest in long-term employment relationships (Emmenegger, 2009), which should foster employers' propensity to offer stability-oriented contracts (with permanent duration, seniority pay, etc.), rather than non-standard work. On the other side, the recruitment of workers with low or general skills makes a more flexible contractual arrangement viable and attractive for the employer. Therefore, while specialised staff are integrated into the internal labour markets and offered stable careers, workers without specific skills are exposed to external markets and are used to absorb fluctuations in demand (Doeringer & Piore, 1971).

More recent approaches have, instead, complexified our expectations on the types of activities associated with non-standard work. For example, Lepak and Snell (2002) have developed an analytical framework connecting non-standard work with the uniqueness of workers' human capital and its strategic value for organisations. According to this framework, non-standard work is particularly common in either low-skilled, routine positions or in high-skill ones, which are not unique to the company's strategies. On the contrary, non-standard work will not be used for activities that are core to a company's business and which require a high level of specific knowledge and competence.

A more recent strand of literature focused on the differences across different types of non-standard work, exploring why employers use different work arrangements in different activities (Cappelli & Keller, 2013; Benassi & Kornelakis, 2021). This literature illuminates the existence of differentiated advantages/disadvantages connected with different types of non-standard work, which depend on the regulatory constraints associated with various contracts and influence the way in which employers use different non-standard work. For example, Benassi and Kornelakis (2021) argue that there is a trade-off between costs and control in using agency and fixed-term contracts, versus freelancers and subcontractors: the former are comparatively more costly, but allow more direct forms of control by the employers; the latter are, instead, more cost-advantageous, but less controllable. Thus, employers might favour agency and fixed-term contracts, despite their higher labour costs, for activities that require closer integration of NSWs into the work organization of permanent workers, while freelancers and subcontractors are most commonly assigned to tasks that can be delivered without cooperation with permanent employees. Employers' choices are also influenced by their capacity of 'institutional toying', i.e. exploit institutional loopholes, ambiguities, and poor enforcement of regulations. In this regard, misclassification might enable employers to rely on freelancers and subcontractors, despite the formal regulations that may (try to) restrain their use. Similarly, the manipulation of costs through the evasion of the proper application of labour regulations might make agency and fixed-term contracts less disadvantageous in terms of costs.

All these factors are relevant in explaining one key element highlighted by the literature on non-standard work, namely the differentiated prevalence of NSWs across different types of companies. Variation across economic sectors (and, more specifically, across different business models; Eichhorst, 2010; Marx, 2011) and variation across countries (Hipp et al., 2015) are the two most significant elements of differentiation which have been addressed by the literature.

In terms of sectoral distribution, non-standard work has been found to be more prevalent in agriculture and in services, and less prevalent in manufacturing and the public sector (European Parliament 2016).

In a more fine-grained analysis, Marx (2011) developed a classification of diverging 'employment logics' of non-standard work which are connected not to sectors, but to occupations. This is influenced not just by workers' skill levels, but also by the predominant 'work logics' of different occupations. Work logics are conceptualized as related to the setting of the work process (including the tasks primarily performed), the relations of authority or command structure, the primary orientation of the worker (towards customers, the organisation or the professional community) and the types of required skills. Marx distinguishes three different work logics, each with a specific connection with non-standard work: the 'technical work logic', typical of manufacturing industries, favours the stability of employment contracts because it takes place mostly in large organisations which require company-specific tacit skills. The 'interpersonal work logic', typical of social services and knowledge intensive, creative industries, is instead based on general skills and forms of work organisation performed individually or in small companies. It therefore tends to be associated with 'unstructured' career paths, often based on 'extended entry tournaments'. The 'occupational work logics', typical of administrative office work, has less connection to a specific skill set, but is typical of large and bureaucratic entities, with work systems closely bound to specific individual organisations. As a consequence, structured careers and internal labour markets are typical of this logic, as visible in the public sector.

Other scholars have shown that it is not only the overall amount of non-standard work to vary across sectors and occupations, but also the specific type of non-standard work on which companies in different sectors rely. In their 'state of the art' article, for example, Hipp et al. (2015) report how temporary contracts have been found to be most common in the construction and service sector industries (among which hospitality, wholesale and retail), and in the public services; part-time work has been shown to have the highest prevalence in other service industries such as health and eldercare, retail, finance, hospitality, insurance and real-estate sectors; self-employment has been found to show the highest prevalence in the agricultural, wholesale and retail, trade and repair, hospitality sectors and among professionals.

Lastly, the literature highlighted how hiring practices do not vary only across distinct sectors and occupations, but also across different countries. Non-standard work is, in fact, differently diffused in different countries depending on the institutional regulation of the labour market. Again, it is not only the overall amount of non-standard work to vary, but also the specific mix of non-standard work arrangements companies rely on in different countries (European Parliament 2016). For example, temporary employment is the dominant form of nonstandard work in Spain and Portugal, solo self-employment is the most common form in Greece and Italy, and part-time work dominates in Denmark, Norway and Sweden (Hipp et al., 2015).

This cross-sector and cross-country variation, in turn, points to different explanations for the differentiated prevalence of non-standard work.

Factors explaining variation in the use and diffusion of non-standard work

As mentioned above, the prevalence and diffusion of non-standard work arrangements vary across industries, occupations, and national contexts. At the country level, substantial heterogeneity emerges not only in the incidence of non-standard work, but also in the dynamics between standard and non-standard forms of employment (Visser et al., 2024): the reciprocal patterns of growth or decline in these two segments are far from straightforward (Hipp et al., 2015). Adding further complexity, countries also differ markedly in the relative importance of the three main types of NSW - temporary contracts, part-time employment, and solo self-employment. As shown by Hipp et al. (2015) in their comparative overview, part-time work is the most widespread form of non-standard work in many countries (see also Allmendinger et al., 2013). In contrast, temporary contracts and solo self-employment are more geographically concentrated. For example, temporary employment is particularly spread in Poland, Portugal, Finland, Hungary, Slovenia, and Spain, while solo self-employment plays a more significant role in countries such as Greece, Romania, Italy, and the Czech Republic.

In light of this evidence, the literature struggles to suggest a clear-cut and linear relationship between country-specific institutions and the diffusion of non-standard work. Nevertheless, the existing studies offer several explanations for these cross-country variations by tracing them back to the influence of institutional frameworks in shaping these developments.

Two main sets of institutional determinants are identified as especially relevant: (i) labour market regulations and collective bargaining institutions; and (ii) social protection systems and the welfare state. These institutions not only shape employers' incentives and decisions regarding the use of flexible non-standard contracts, but also determine the level of security and protection workers experience when employed under such arrangements, as well as workers' willingness or propensity to accept a non-standard work position. Furthermore, they have differentiated effects on - and help account for - the diffusion of the three abovementioned main types of non-standard work.

Labour market regulations and collective bargaining institutions

According to a well-established literature, the key institutional factor influencing the incidence of non-standard work is the configuration of employment protection legislation (EPL), particularly the legislation regulating hiring and dismissal for both standard and non-standard contractual arrangements. The higher the costs associated with dismissing employees on standard contracts, the more inclined employers will be to rely on temporary arrangements and the more hesitant they will be to offer open-ended positions (Polavieja, 2006). Comparative empirical research shows that, in countries with strict EPL and encompassing labour market institutions for standard employment, the incidence of non-standard work tends to be higher, as firms rely on these contracts to preserve flexibility to tackle fluctuating market demand, while avoiding the high costs associated with dismissals (Hevenstone, 2010; Kalleberg, 2000). Collective bargaining institutions are also important factors in shaping cross-country differences in the

prevalence of non-standard work (Gautié & Schmidt, 2010). In particular, the inclusiveness of the collective bargaining system – reflected in its degree of coordination and centralization – plays a key role. According to Polavieja (2006), higher levels of centralization and coordination reduce employers' reliance on non-standard work, as coordinated systems establish more uniform wage and employment standards and limit cost-based competition among firms. Conversely, decentralized and weakly coordinated bargaining structures provide employers with greater flexibility to reduce labour costs and manage uncertainty through temporary or non-standard contracts, thereby fostering their adoption. The ILO (2016) further notes that in contexts where union coverage and sectoral bargaining remain strong, such as in parts of continental Europe, non-standard workers tend to benefit from better wage protection and working conditions. In contrast, in more deregulated environments, workers in non-standard work arrangements are often associated with job instability, lower pay, and limited opportunities for career progression (Kalleberg, 2009; Eichhorst & Marx, 2015). The introduction of a statutory minimum wage also plays a role, as it may incentivise employers to hire workers on a temporary rather than a permanent basis (Gautié & Schmidt, 2010).

Overall, these institutions tend to exert complementary effects, as documented in the literature. Non-standard work, for example, is expected to be more prevalent in national contexts where the absence of a statutory minimum wage is coupled with stringent EPL for permanent employees and/or weak regulation governing the hiring of workers under non-standard work arrangements (Lee, 2013). Altogether, these explanations speak to the so-called 'free-market seeking hypothesis'. It posits that firms strategically respond to rigid labour market institutions – such as strict EPL, high dismissal costs, or strongly coordinated collective bargaining – by seeking ways to recreate more 'free-market' conditions within these constraints. One common strategy is to increase the use of non-standard work arrangements, which offer greater flexibility and lower costs than standard, open-ended contracts.

The economic cycle, wage-setting institutions and collective bargaining

Institutional factors are thus important because they shape employers' decisions regarding hiring and firing and their internal labour market. Focusing on the demand side of non-standard work reveals that the share of NSWs is influenced not only by institutions, but also by the broader economic context, particularly by how labour markets respond to the business cycle (Gangl, 2002). The economic environment is expected to play a critical role in shaping these strategies by affecting uncertainty (Holmlund & Storrie, 2002). In labour markets experiencing rapid deterioration, rising economic uncertainty makes employers less willing to commit to long-term employment relationships, especially when institutional frameworks impose high dismissal costs for standard contracts.

The effects of economic pressures are themselves mediated by the institutional environments in which firms operate. As Gautié and Schmitt (2010) show, firms adopt markedly different competitive strategies depending on national wage-setting and regulatory frameworks. In countries with strong collective bargaining institutions and robust wage regulations (such as Denmark), firms are more inclined to invest in automation rather than expand low-wage employment, since downward wage adjustments are more

constrained and thus less profitable. Conversely, in institutional settings characterized by weaker unions and more permissive regulatory regimes, firms tend to rely more systematically on low-wage labour as a cost-reduction strategy, particularly in sectors such as hospitality, food services, retail, and call centres.

In this perspective, the high- vs. low-road approaches to competitiveness provide a useful framework to understand how firms' employment strategies (Marsden 1999), including the use of non-standard work, are shaped by both institutional and economic contexts. In a high-road strategy, firms compete primarily through productivity, skill development, innovation, and product quality rather than through cost-cutting. This approach often relies on stable, well-trained, and committed employees, typically employed under standard contracts, and is supported by strong labour market institutions, comprehensive training systems, and coordinated collective bargaining. Under such conditions, non-standard work is used selectively, mainly to address short-term fluctuations in demand rather than as a systematic cost-reduction tool. In contrast, a low-road strategy emphasizes cost minimization and labour market flexibility as the main source of competitiveness. Firms following this path are more likely to rely extensively on temporary, part-time, or contingent contracts to reduce labour costs and respond quickly to market fluctuations (Kalleberg, 2011). This strategy is more common in contexts where labour market regulation is weak, collective bargaining is decentralized, and social protection for non-standard workers is limited. Consequently, low-road strategies tend to reinforce labour market segmentation, precarious employment, and wage inequality (Appelbaum & Batt, 2014).

Linking this to the institutional perspective, the prevalence of high- versus low-road strategies interacts with macroeconomic conditions and institutional frameworks: strong employment protection, inclusive collective bargaining, and comprehensive social protection systems can incentivize firms to pursue high-road strategies, while deregulated labour markets and high dismissal flexibility may encourage low-road approaches. This perspective helps explain cross-country variation in the incidence and quality of non-standard work and its associated risks.

Social protection systems and the welfare state

The configuration of unemployment benefits affects the share of non-standard work, in particular, of temporary contracts. Unemployment insurance, in fact, can encourage employers to rely on temporary contracts as a way to reduce labour costs, and it may also make workers more willing to accept unstable forms of employment (Hevenstone, 2010). Also, the availability of accessible childcare services represents another determinant of the diffusion of STW, with specific regard to part-time work, a highly feminised arrangement. Affordable, high-quality childcare is positively associated with mothers' employment rates and working hours; when childcare is scarce, costly, or of poor quality, mothers are more likely either not to work or to limit their participation to part-time employment (OECD, 2010). Social protection systems play a crucial role in shaping both the quality and the risks associated with non-standard work. In Nordic countries, where benefits are universal and portable, workers in flexible arrangements retain access to unemployment insurance, pensions, and health care, reflecting the 'flexicurity' model (Wilthagen & Tros, 2004; Bredgaard et al., 2008). In contrast, in

Southern European regimes, where welfare entitlements are closely tied to standard, long-term employment, temporary and part-time workers face substantial disadvantages, exacerbating labour market segmentation and inequality (Ferrera, 1996).

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6 Trade unions and precarious non-standard work: a literature review

Maarten Keune, AIAS-HSI, University of Amsterdam

There is a growing use of temporary contracts, zero hour and on-call contracts, temporary agency work, marginal parttime work, self-employment, platform work and other types of insecure, vulnerable work and/or low paid work with limited growth opportunities. This expansion has led to some extent to a dualization of the labour market between well-protected insiders with a permanent full-time contract and vulnerable outsiders with low wages, limited job security and weak social security entitlements (Emmenegger, 2012; Palier et al., 2018). In recent years, this dualization has only been strengthened by the COVID-19 pandemic (Natili et al., 2023). Dualization does not only take place along the lines of standard and non-standard work: also within standard work low paid, dead-end jobs have been on the rise, while among non-standard workers some have been doing quite well, in particular among the self-employed. Not all non-standard workers are precarious and not all precarious workers are non-standard workers. However, there is a very strong overlap between the two categories.

This process of dualization has not simply been an inevitable outcome of economic and technological developments, but also of conflicts and choices in the political sphere and in labour relations (Crouch & Keune, 2012). A key actor to be considered in this respect are trade unions.

Trade unions emerged in Europe as organisations that defended precarious, insecure workers that got low wages, worked long hours and suffered from bad working conditions and a lack of social security. The workers that early trade unions represented and tried to organise were, in today's terms, mostly informal, self-employed workers like artisans, day-labourers and others (Webb & Webb, 1919; Lucassen, 2006). Over time, trade unions gained strength and played a central role in formalising these workers through their struggle for workers' rights and the welfare state, albeit with major differences between countries in the type and level of (Korpi, 1974; Crouch, 1993; Esping-Andersen, 1990). This formalisation resulted in the post-World War II 'trente glorieuses' in permanent fulltime work becoming the new standard type of employment for male workers. Non-standard types of work declined substantially although they remained important in certain sectors and professions. It was the new standard work that made up the bulk of trade union membership, although also in certain sectors dominated by non-standard work union membership was high.

Since the 1970s two parallel, but not independent, developments took place. On the one hand, union membership and union power have declined almost everywhere in Europe (Crouch, 2017; Ebbinghaus & Visser, 1999; Gumbrell-McCormick & Hyman, 2013). This gave employers increasing discretion to shape employment in the ways most advantageous to them, shifting risks onto the shoulders of workers among other by utilising precarious, non-standard work, often facilitated by legislative changes (Baccaro & Howell, 2017; Boumans, 2024). As a result, precarious non-standard work started to grow

again, resulting in the intensifying dualization of the labour market. It is the relationship of contemporary trade unions with these more recent types of non-standard work that we will discuss here, with a focus on the traditional, more established unions. Labour market dualization has presented these trade unions with complicated questions about representation, interests, solidarity, identity and strategies and power resources.

Representation, identity and interests

Trade union membership, overall in decline, is particularly low among non-standard workers. This raises the question if trade unions can or want to represent them. Acting as their formal, legal representative in for example collective bargaining is difficult because of the absence of the membership link. Also, representing non-standard, non-member workers forces unions to deal with complicated political issues. It implies that representatives ‘...bring in interests and perspectives that are technically outside their formal territorial representation (Meardi et al., 2021, p. 45).’ Hence, it involves ‘...the (re)formulation of employee interests and their operationalization as bargaining objectives and priorities, which requires internal (implicit or explicit) mediation among the interests of different constituencies (Meardi et al., 2021, p. 45).’ Representation of non-standard workers is then not so much a mechanical process in which unions formally and substantively act for the other, but more a more dynamic and political process of claim-making (Meardi et al., 2021).

Why would unions then engage in this difficult exercise that may unsettle their membership base? This question can be addressed from different, but interrelated, perspectives. One is trade union identity, a key variable in explaining union attitudes towards peripheral workers (Dorigatti, 2017; Benassi & Vlandas, 2016). Hyman (2001) distinguishes three ideal-typical trade union identities, which all exist in real life union identities but with different emphasis. *Unions as market actors* pictures unions principally as interest organisations that focus on maximising the material welfare of their members through collective bargaining on wages, working hours and other employment conditions. *Unions as class actors* sees unions principally as being involved in class struggle against capital and the capitalist system, emphasizing confrontation over negotiation. And *unions as societal actors* emphasize the role of unions as champions of social justice and defenders of the welfare of society at large. The implications of this typology are clear. Unions tending more towards market actors will be less interested in non-standard workers because they are generally no union members. For unions tending towards societal actors membership is of less relevance, as from this perspective unions represent all workers and citizens, in particular the weaker ones, in their pursuit of social justice and improved welfare. Their representation of precarious workers is of a political nature and will address not only employers but also the state. Unions tending towards class actors will be less sensitive to the particular situation of non-standard workers, but will see them as part of the broader worker universe that struggles against capitalism, the root of precarity and bad working conditions.

A second perspective is that of interests. This is most clearly addressed in the insider-outsider debate. Orthodox economists and political scientists argue, in line with the union as market actors type, that trade unions are basically the defenders of the interests of their members, mainly consisting of the core workers with the better protected and

remunerated jobs, the so-called insiders (Lindbeck & Snower, 2001; Rueda, 2007, 2014; Saint-Paul, 1996). They do not, it is maintained, represent the outsiders, those with the flexible, insecure and low paid jobs, because they are not members, or if they are, because their numbers are marginal to those of the core workers.

What is more, the proponents of this insider-outsider theory claim that the interests of the two groups are opposite to each other: where insiders want to protect their privileged position from employer demands, outsiders want to get access to these same privileges, which will be to the detriment of the insiders. From this point of view, outsiders are only interesting for trade unions in instrumental terms: they can provide organisations with flexibility and cost advantages while shielding the core workforce from fluctuations (Rueda, 2014). Trade union would then consent to or even promote the flexibilization of the outsiders to protect the core. Following this line of argument, strong unions may play a role in furthering the dualization of organisations and the labour market at large (cf Meardi et al., 2021).

Classic insider-outsider theorists base their entire theory on this assumption of conflicting interests between insiders and outsiders, and their point of view has been repeated by many others. For example, Herrantz (2024: 3) argues that in a dual labour market, insiders and outsiders have conflicting interests because the distribution of risks is not uniform between these groups. Others have however argued that this viewpoint is mistaken. One argument is that weakening trade unions see the growing numbers of non-standard workers as a possible source of new membership. Another argument that is forwarded is that the interests of the core and peripheral workers differ much less than insider-outsider proponents claim. Survey evidence shows that both groups favour tight employment protection (Emmenegger, 2009), which would allow unions to represent both groups with one objective. Also, it is increasingly recognised that the fates of the two groups are interrelated: increased precariousness in the labour market makes the labour market in general less stable, leads to downward competition between companies, and the increased use of non-standard work is strategically used by employers to put pressure on the wages and conditions of the insiders (Keune & Pedaci, 2020; Benassi & Dorigatti, 2015; Trif et al., 2023). Hence, it is in the interest of core workers and their representatives to limit non-standard work and to raise its standards. At the same time, if unions try to be inclusive with the objective to protect core workers, they may not be addressing the priorities of non-standard workers. For example, insider may prioritise job protection, while platform workers may prioritise adequate pay and algorithmic transparency, and bogus self-employed bargaining rights.

Another contested claim is that it is assumed by the proponents of insider-outsider theory that the identity of trade unions is simply that of a one-dimensional market actor with no other identity elements present. This is a simplistic and one-dimensional image of what trade unions are, contradicting the above-discussed findings of Hyman (2001) that union identities are multidimensional and that all three types of union identity are present in trade unions, albeit with different emphasis. This is confirmed by plentiful empirical studies that show that the political identities of unions play a major role in their approach of the position of non-standard precarious workers and that many trade unions, and in particular the large union confederations, do indeed develop strategies to

limit employer discretion, to improve the wages and working conditions of this group, and/or to foster the conversion of non-standard work in standard work (Doellgast et al., 2018; Keune & Pedaci, 2020; Trif et al., 2023; O'Brady, 2021; Pulignano et al., 2015; Keizer et al., 2024; Dorigatti, 2017; Carver & Doellgast, 2021; Keune, 2013; Hyman and Gumbrell-McCormick, 2017). This then suggests that many trade unions aim to represent outsiders as well as insiders, that they attempt to be inclusive towards non-standard workers, and that they can be a key factor in reducing non-standard work and/or improving the conditions of this group of workers.

However, these same and other studies show that not all unions have moved in the same direction. Moreover, both the inclination of unions to actually represent non-standard workers and the success in doing so may vary substantially depending on the institutional and economic conditions under which unions operate, the power resources they can access and the strategies they apply. Unions operating under adverse institutional or economic conditions, and/or lacking sufficient power resources, may well retreat to defend the core and accept dualization as the least-worse or second best option (Meardi et al., 2021, Palier & Thelen, 2010; Pulignano et al., 2015; Benassi & Dorigatti, 2015).

In the next section we take a closer look at these issues.

Institutions, power resources and strategies

Unions across Europe have been confronted with labour market dualization and the problem of precarious non-standard work because employers increasingly use this type of work and because certain groups of workers prefer self-employment over dependent employment. However, the issues unions face in this respect differ according to both national and sectoral conditions. National institutions play a key role in what types of non-standard work are allowed and the extent to which such types of work are protected through labour market and welfare regulations against low wages (e.g. minimum wage regulations), flexibility (e.g. the possible number of consecutive fixed-term contracts or the regulation of temporary work agencies), social risks (e.g. unemployment insurance, pensions regulations, work-life balance regulations), etc. (Kalleberg, 2018).

However, in spite of national institutional differences, major within country-differences and cross-country similarities prevail where the types and causes of non-standard work are concerned. Keune and Pedaci (2020), based on a comparative study of construction, industrial cleaning and temporary agency work (TAW) in six countries, show this in the following way:

Each sector has its own profile of precarious work that is remarkably similar across countries: temporary contracts and (dependent) self-employment in construction, marginal part-time work in cleaning and short-term work in the TAW sector. These types of work all entail, in distinctive ways, (relatively) low pay, insecurity, limited access to social benefits, limited representation and voice, limited training opportunities and/or high work intensity. These different types of precarious work are closely related to the distinct ways in which industrial and work organization are shaped in the

three sectors: fragmented international supply chains in construction, short morning and evening shifts and isolated, 'invisible' work in cleaning and highly unstable and fragmented work in TAW (Keune and Pedaci, 2020, p. 151).

A similar argument can be made concerning industrial relations institutions. Traditionally comparative industrial relations research has focused on similarities and differences between countries (Crouch, 1993; Ferner & Hyman, 1998). And indeed, such differences were and are of paramount importance in understanding unions and their relationship to non-standard work. However, Bechter et al., (2012) argue against 'methodological nationalism' as it obscures other important dimensions, in particular that of the sector. They argue that industrial relations vary across sectors as deeply as they do across countries and that both are equally important in understanding how industrial relations are constituted. Hence, in understanding the relationship between unions and non-standard precarious work both the national and the sectoral level matter.

And indeed, recent research confirms that the way unions deal with non-standard precarious work differs substantially between sectors (Håkansta et al., 2024; Keune & Pedaci, 2020; Carver & Doellgast, 2021). This on the one hand because the challenges differ, but on the other because industrial relations, and the options for action that the unions have vary. This is most often discussed in terms of power resources.

Power resource theory (PRT) emerged in the 1970s spearheaded by Walter Korpi (1974, 1983) and Esping-Andersen (1990). It offered an alternative to the functionalist theorizing of the development of the welfare state that was dominant in those days by bringing power, class and trade unions (back) into the analysis. It became a key approach for industrial relations scholars and has become especially prominent again in recent years (cf Arnholtz & Refslund, 2024; Refslund & Arnholtz, 2022). Scholars researching the relationship between unions and non-standard precarious work often draw on PRT to explain the actions of unions through the power resources they have access to (Trif et al., 2023; Keizer et al., 2024; Doellgast et al., 2018; Keune & Pedaci, 2020; Dorigatti & Mori, 2025; Jaehrling, 2025).

PRT argues that societal development to a large extent is driven by the power struggle and distribution of power resources between key economic actors, most importantly trade unions, and employers. Power is seen as the capacity of actors to shape or resist change, and should always be analysed in relation to the power of others: union power interacts with employer power in their struggle to achieve their goals. PRT distinguishes five types of power resources that workers and trade unions can have access to (Refslund & Arnholtz, 2022):

- Structural power: Power that arises from workers' position in the economy and labour process: e.g. their ability to disrupt production (workplace power) or the condition of labour supply/demand (marketplace power).
- Institutional power: Power that comes from formal rules, laws, regulations or institutional arrangements that actors can use to influence labour market and welfare.

- Associational power: Power stemming from collective organisation: the capacity of workers to form associations (mainly trade unions), recruit members and mobilise members.
- Ideational power: Power based on ideas, norms, frames or discourses: the ability to shape beliefs, values, and legitimize certain interests or social arrangements, thereby influencing what is seen as acceptable or desirable.
- Coalitional power: Power derived from building alliances or coalitions with other actors: aligning interests, coordinating action across groups, and expanding the scale and scope of influence through cooperation.

Lévesque and Murray (2010) provide a different set of power resources that unions can access:

- Internal solidarity: the cohesion and collective identity within the union: shared commitment among members, sense of belonging and mutual support.
- Network embeddedness (or external solidarity): the union's connections within broader networks (other unions, community organizations, allies, stakeholders), which can be mobilized when needed.
- Narrative resources: the stories, discourses or frames that the union crafts to shape how members, employers, and society understand labour issues, union actions, and collective purpose.
- Infrastructural resources: the concrete material and organizational capacity (e.g. human resources, facilities, administrative structures, processes, policies and programmes) necessary to support action, mobilization, and sustained union activity.

The two sets of power resources partially overlap: network embeddedness resembles coalitional power, while narrative resources are similar to ideational power. Lévesque and Murray's categories internal solidarity and infrastructural resources are however important additions to the traditional power resources framework. Internal solidarity is key to inclusive union policies, important to extend union activities to non-standard workers, while infrastructural resources provides the necessary material dimension required to mobilise the other power resources.

In its simplest form, PRT argues that the more power resources union have, the more they can attain labour market and welfare state outcomes that align with their interests and ideas. Unions use their power resources to counterbalance employer power and influence public policy (Refslund & Arnholtz, 2022). Power resources are however not static but dynamic: they can be obtained or constructed but they can as well be exhausted or vanish. They also interact with each other in dynamic ways:

While these power resources are important on their own right, they also interact and overlap in important ways. For example, building associational power cross various workforce segments cannot be achieved without developing an inclusive ideational narrative that appeals to both secure and precarious workers alike. Similarly,

institutional power resources are often the product of strong associational and coalitional power resources, and the leverage of structural power resources to push through substantive reforms. In a context of institutional change and fragility, trade unions may look to broader social campaigns and coalition building to strengthen their social legitimacy. The interaction of different power resources can produce virtuous or vicious circles (Keizer et al. 2024, p. 387).

Lévesque and Murray (2010) add to this that power resources are a necessary but insufficient condition for unions to act successfully: union need capabilities to be able to use their power resources, with capabilities referring here ‘...to sets of aptitudes, competencies, abilities, social skills or know-how that can be developed, transmitted and learned’ (Lévesque & Murray, 2010, p. 336). They identify four strategic capabilities: intermediating between contending interests to foster collaborative action and to activate networks; framing; articulating actions over time and space; and learning. Moreover, they argue, resources and capabilities need to be in the right mix at the right time, to allow unions to mobilise their resources to deal with the challenges of specific moments, but also forcing them to adapt them over time to changing requirements through experimentation, research and learning (Lévesque & Murray, 2010). They refer to union capacity as the total of their power resources and capabilities.

Power resources and capabilities are key to understanding union action related to dualization and non-standard precarious work. More relevant power resources and capabilities would allow unions to develop more effective inclusive policies and reduce precariousness. This is a complicated relationship however as

...the prevalence of precarious work often negatively affects the power resources that unions can draw upon in their efforts to represent all workers. For example, precarious work may reduce associational power (enhancing the organisational challenge faced by unions), institutional power (through reduced collectively agreed and statutory rights), structural power (since those in precarious work are less likely to exert “control” over production processes), and ideational power (making it more challenging to develop collective action) (Keizer et al. 2024, p. 398).

Union activities towards non-standard precarious workers hence often have to be developed under adverse conditions with limited readily available power resources and capabilities. This is however not necessarily an unsurmountable problem as grassroots unions and movements have emerged at many moments in history. Also, trade unions in recent years have also been able to develop new solidaristic and inclusive activities for non-standard workers under difficult, uncertain conditions (Trif et al., 2023; Doellgast et al., 2018; Però, 2020; Murray et al., 2020; Carver & Doellgast, 2021; Vandaele & Fabris, 2025).

What then do these studies show to be factors of success or promising avenues to follow for trade unions? First of all, union policies, practices and discourses should be inclusive towards non-standard workers but also as migrants, women, young people or low skilled. Doellgast et al. (2018) argue that there can be virtuous and vicious circles in

union attempts to address precarious work. These circles take shape depending on the extent that unions mobilize on the basis of inclusive institutions and foster inclusive solidarity between workers. Virtuous circles follow a clear inclusive path to overcome class and ethnic divided and manage to reduce precarity. Vicious circles employ exclusive union strategies, include fragmented institutions and particularistic form of worker identity. Also, unions are not the only important player in their model: virtuous circles include voice-oriented employer strategies, while vicious circles include exit-oriented employer strategies aiming to exit negotiations.

Carver Doellgast (2021, pp. 372-377) build on these findings to identify five paths regarding union engagement with peripheral work:

- Two paths to dualism. One combining fragmented institutions and lack of solidarity across unions and the other combining partnership-oriented union identities with unfavourable structural conditions.
- Two path to solidarity. One conflict-based path, including strikes, protests and law suits, occurring either in the absence of institutional power or in contexts in which institutional power is in decline. The other a social partnership path, more often utilized by unions who retained (some) institutional strength, in particular in the form of sectoral bargaining, to include non-standard workers in existing protective institutions.
- One path to failed solidarity. Solidarity attempts failed where union were not able to create common identities across groups of workers, occupations, age groups or countries. Failed solidarity occurred most often in the case of migrants.

Lévesque & Murray (2010) and Murray et al. (2020) start from the observation that the external conditions under which unions operate have deteriorated over time, reducing both institutional and structural resources. However, this does not mean that unions have no agency and cannot act upon the challenges of precarious work (see also Korpi 2006). They emphasize both the need and the possibility for unions to develop new or strengthen existing power resources related to internal solidarity, external solidarity, and their strategic and discursive capacity, with a view to strengthen the position of precarious workers (Lévesque & Murray, 2010; Murray et al., 2020). Murray et al. (2020) observe and call for extensive experimentation to formulate resilient responses and develop collective capabilities in two steps: experimentation at the organisational level, where social actors seek to modify or renew their organisations, networks and alliances and reflect on and learn from these experiments; and institutional experimentation, where successful responses are scaled up and institutionalised.

Trif et al. (2023) use the framework of both Doellgast et al. (2018) and Murray et al. (2020) to study union actions aimed at improving the conditions of precarious workers on multiple dimensions in nine countries and four sectors in Central and Eastern Europe. They argue, based on their comparative study, that ‘...unions can articulate and represent the interests of precarious workers even when they face unfavourable conditions’ (Trif et al. 2023, p. 162). They show that the emergence of union initiatives and their success or failure does not depend so much on their institutional and structural power

resources: successful strategies can be observed in all countries and all types of sectors. Their success or failure depends rather on 'internal resources' like proactivity (also Bernaciak & Kahancová, 2017; Dufour and Hege, 2010), external links and internal democracy aimed at inclusivity (also Marino et al. 2019; Vandaele & Fabris 2025) that can empower unions. They claim that '...proactive unions with clear objectives that are based on convincing win-win discourses can overcome their external constraints by acting as drivers of change in precarity patterns' (Trif et al., 2023, p. 163). Moreover, they show that unions may not easily improve the job security of precarious workers, but may have more impact on their wages and voice. They also argue that:

By facilitating actions that reconcile the interests of different categories of workers with those of employers and governments, union intermediation is critical for improving the relevant dimensions of precarity. It also contributes to (re)building solidarity among various societal actors' (Trif et al., 2023, p. 163).

This latter issue resonates with what Keune and Pedaci call union strategies that address 'third actors', i.e. actors formally external to the employment relationship. Recently, this is discussed widely in the context of public procurement and the possibilities for unions to build local alliances around precarious work and public procurement with for example municipalities, and to address precarity in public procurement in labour clauses and collective agreements (Jaehrling et al., 2018; Dorigatt & Mori, 2025; Jaehrling, 2025; Tros et al., 2025).

Vandaele and Fabris (2025) also follow up on the Murray et al. (2020) call for experimentation. They discuss what happens after democratic experimentation for union revitalisation, how experiments can be anchored and scaled up and how innovative policies, methods and tactics are transferred and diffused within and across union organisations. They show that while there is no shortage of innovative and successful experiments, there is a need for unions to critically assess their own internal barriers to organizational change and revitalisation. Where innovative experiments may be successful, their institutionalisation may be obstructed by internal bureaucracy and union culture, lack of union democracy and limited organisational effectiveness (Vandaele & Fabris, 2025). Successful policy transfer requires, among other things, supportive leadership and an active deliberative culture; sufficient infrastructural resources; and a solid organisational learning capacity. But above all it depends on '...the extent trade unions in Europe are both willing and able to cultivate those resources and leverage them for effective policy transfers of innovative methods, tactics or practices' (Vandaele. 2025).

Future research

From the literature review a number of starting points for future research emerge.

- It is useful to continue to research success and failure of experiments in the representation of non-standard, precarious workers by trade unions, to learn more from these experiments, and to dedicate due attention to both the longer term impact of experiments themselves, and on the extent and way unions learn from experiments and manage (or not) to adapt and transform their own identities and strategies to more effectively target precarious work.

- A question that also deserves more attention is how to align the interests of standard and non-standard workers. Whereas it is increasingly clear that the fates of the two groups are interrelated, their priorities may be different at any given point in time. How unions can resolve this is a key research concern.
- The power resource framework is very relevant for further trade union research, however, it would be important to try and combine the traditional one, as used by Arnholz and Refslund, with the Lévesque and Murray one. Also, it would be interesting to further clarify the relationship between the power resource framework and the industrial relations and employment regimes discussed in chapter 4.
- It would be important to dedicate more effort to theorizing in a field dominated by empirical studies, and to bringing together existing theories, explanatory frameworks and concepts like union strategies or precarious work, to strengthen the field and contribution of industrial relations.
- It is important to give attention to organizing precarious workers, collective action and cooperation with other actors representing these workers. However, it is also important to look at cooperation with employers and the state, and to influencing the state to e.g. achieve legislative changes.
- Concerning other actors representing NSWs, it is important to get a better view of their characteristics, power resources, under what conditions they emerge and what their relationship with traditional unions is. This is to a large extent discussed in chapter 7.
- Under-researched areas are employer strategies and motives; identities and subjectivities of (precarious) workers, their interests and needs, and their attitudes towards collective action and representation; the broadening of unions' representativeness claims and solidarity towards e.g. migrants and the respective coordination and cooperation with other organizations representing these workers, and the opportunities this offers for union renewal.

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7 Alternative models of representation and voice: grassroots and institution-led initiatives

Trine P. Larsen, Emily Erickson (University of Warwick) & Maarten Keune (AIAS-HSI, University of Amsterdam)

Introduction

This chapter examines the state of the literature on emerging forms of worker voice and representation among non-standard workers (NSWs). The purpose, principally descriptive, is to map innovative practices and develop analytical frames for the empirical work to be undertaken in the Horizon Europe Integrate Dialogue project as part of the work package 5. The literature on NSWs is growing and encompasses a broad set of employment arrangements, including temporary agency work, fixed-term and zero-hour contracts, part-time, freelance and the solo-self-employed, platform and posted workers. Research on the NSWs often takes an intersectional approach, considering factors such as migration, gender and age. While traditional forms of worker voice remain relevant, this review focuses on the innovations and novel approaches which are emerging – in response to or in support of those engaged in non-traditional forms of work. These include adapting existing models to new contexts, introducing organisational forms, using digital tools and embedding workers' intersectional identities into organisational strategies. Many innovations arise from grassroots initiatives – bottom-up approaches to self-organising efforts originating outside traditional trade unions or institutional channels. Others originate within established organisations and are institution-led initiatives, seeking to extend dialogue and representation to NSWs through diverse organisational settings and approaches. Understanding these alternative approaches is critical for addressing persistent gaps in representation and to inform future policy and research.

The chapter proceeds as follows: Section 7.2 introduces the state of the literature on alternative models of voice, section 7.3 defines the key terms and concepts before we in section 7.4, 7.5 and 7.6 review different strands of literature organised around what we classify as (a) traditional grassroots initiatives which emerge outside of the established organisations and institutional contexts, (b) institution-led initiatives which are developed outside of traditional union contexts such as professional and employer organisations or government bodies, and (c) an examination of the digital organising and representation which is emerging across contexts. For each, we examine their emergence, effectiveness and sustainability, means of actions, social dialogue practices and provide illustrative examples. Section 7.7 sums the main conclusions with an identification of future research priorities.

State of the literature on alternative models of representation and voice

Trade unions are widely considered the cornerstone of worker voice and representation within different industrial relations regimes, yet a long history of alternative, non-union

models—such as yellow unions, professional bodies, works councils, health and safety committees, worker centres and employer-supported voice channels—shows that representation has always extended beyond unions (Tavora et al., 2025; Donaghey et al., 2011; 2022; Guarin et al., 2025; Taran, 2022). Non-standard workers (NSW), who are typically underrepresented within trade unions, demonstrate the broader scope and potential of alternative voice and representation. Different strands of literature have explored NSWs representation and voice through both union-led and non-union led initiatives, but with different focusses and analytical lenses. Ample research has explored the representation and voice of NSWs, often through the lenses of trade unions and NSWs' position within the industrial relations regimes and social dialogue at EU-, national-, sector- and company-levels (Heery, 2009; Doellgast et al., 2018; Larsen et al., 2022; Keune & Pedacci, 2020; Grumbrell-McGormick, 2011; Pulignano et al., 2015; see also chapters 4 and 6). This strand of literature tends to examine both trade unions' more general approach towards NSWs as well as specific groups such as temporary agency workers, fixed-term workers, freelancers/solo self-employed, platform workers, posted workers, part-time workers, including those under zero-hour contracts etc. (Grumbrell-McGormick, 2011; Keune and Pedacci, 2020; Vandaele & Rainone, 2025; Ilsøe et al., 2024; Holgate, 2015; Benassi & Dorigatti, 2020; Arnholtz, 2022; MacDonald & Koltatkar, 2021). This body of work often identifies a shift in trade union strategies towards NSWs from trying to exclude them to increasingly include and represent them, but with marked variations across and within countries, sectors, workplaces and worker groups (Heery, 2009; Pulignano et al., 2015; Doellgast & Carver, 2021; Meardi et al., 2021; Alberti et al., 2013; Lindbeck & Snower, 1988; Rueda, 2007; Keizer et al., 2024; Mackensie, 2010).

A growing literature also explores alternative, often grassroot and non-union, forms of voice and representation for NSWs (Dundon et al., 2011; 2025; Tavora et al., 2025; Signoretti et al., 2025; Alcalde-González et al., 2024). These studies draw on industrial relations, dualization and segmentation literature, alongside social movement theory and power resource theory to analyse the emergence, development and sustainability of such initiatives and their interactions with traditional trade unions and the wider industrial relations systems (Joyce et al., 2023; Signoretti et al., 2025; Cini, 2023; Woods et al., 2019; Hau & Borello, 2024; Dasgupta et al., 2025; Holgate, 2015). Platform work has particularly attracted much attention in recent literature exploring alternative non-union, and often grassroots led, models for voice and representation (Dasgupta et al., 2025; Dasgupta et al., 2025; Vandaele & Rainone, 2025).

Research on non-union models and grassroots initiatives for worker voice and representation tends to highlight the struggles trade unions face in representing NSWs, arguing that alternative initiatives typically emerge to fill the void left by traditional trade unions' absence (see also section 3; Tapia et al., 2015; Tavora et al., 2025; Donaghey et al., 2011; Guarin et al., 2025; Signoretti et al., 2025; Però & Downey, 2024). Their focus is frequently on groups such as migrant workers, women, young people, unemployed, low paid and various groups of highly skilled and unskilled NSWs or those working in non-unionised settings (Alcalde-González et al., 2024; Dasgupta et al., 2025; Holgate, 2015; Altermi, 2016; Alberti and Però, 2018; Donaghey et al., 2011). The literature consistently finds that such groups experience lower levels of institutional representation

within traditional trade unions and collective bargaining systems (Simms and Dean, 2015, Taras, 2002; Meardi et al., 2021; Doellgast et al., 2018; Donaghey et al., 2011; Guarin et al., 2025; Alberti, 2016). A recurring argument is that the traditional channels of worker representation and voice are built around trade union presence and the standard full-time open-ended employment contract, leaving workers in other employment situations less covered (Simms & Dean, 2015, Taras, 2002; Meardi et al., 2021; Doellgast et al., 2018).

Most research on worker representation and voice further tends to explore alternative models of representation from a worker or trade union perspective. Only few studies include the perspectives of employers, governments and non-governmental bodies in shaping these initiatives (for exceptions, see for instance Been & de Boer, 2022; Ilsøe & Larsen, 2023; Nicolaisen & Trygstad, 2015; Kallas, 2025).

There also seem to be an overrepresentation of qualitative and often single country case studies with notable exceptions of cross-country comparisons – typically involving 2-3 countries. The comparative studies typically focus on larger digital labour platforms or logistics firms such as Uber, Just Eat and Amazon or on migrant workers and union-led initiatives in low wage services, logistics, construction and manufacturing (Holgate, 2015; Keune & Pedacci, 2020; Larsen et al., 2022; Grimshaw et al., 2017, Arnholtz, 2022). Studies of alternative non-union and grassroots models of representation usually explore company or sector-level initiatives, which may not be union led, but receive union support once established (Hau & Savage, 2023; Joyce et al., 2023; Tapia et al. 2015; Taras, 2022; Donaghey et al., 2011 Guarin et al., 2025). Representation of NSWs at EU level is less researched, although some studies examine NSWs role in shaping, implementing and enforcing EU labour market regulation, including the EU directives on part-time work, fixed-term work, temporary agency, platform work, posted work, European works councils as well as broader issues such as telework, public procurement, gender equality, health and safety issues etc. (Pulignano et al., 2015; Arnholtz et al., 2025; Arnholtz & Lillie, 2019). Like national-level research, these EU studies rarely compare initiatives across different groups of NSWs or governance levels, despite divergent strategies among grassroot movements, employers, trade unions and governments may diverge (O’Brady, 2021; Kallas, 2025; Meijerink & Arets, 2021; Larsen et al., 2024). Overall, the literature offers depth, but limited breath, underscoring the need for analytical frameworks that capture how alternative non-union and grassroots models of voice and representation emerge, evolve and endure across groups, workplaces, sectors, countries and multiple levels.

Defining key concepts

Grassroots initiatives often emerge outside the established industrial relations structures and represent an alternative form of worker voice (Dasgupta et al., 2025). This is why we not only distinguish between worker voice and representation, but also adopt a broad definition of worker voice, differentiating between two types of initiatives comprised of what can be considered institution-led and grassroot-led initiatives for voice and representation (see below). This approach will allow us to capture the broad range of voice channels that transcend the traditional physical workplace and engage external stakeholders as well as both unionised and non-unionised structures (Dasgupta et al.,

2025). We define voice along the lines of the work by Dasgupta et al. (2025) and consider voice as 'encompassing expressions and/or actions undertaken by workers to influence key stakeholders in order to advance their interests and defend their rights within a working relationship' (Dasgupta et al. 2025, p. 652).

While our definition of voice is broad, our understanding of representation is narrower and aligns more closely with traditional definitions of worker representation. We define worker representation as the form of rights and processes of workers to rely on a third party being it a trade union, employee elected individual or collective body to consult and negotiate with management, employers organisations and policymakers on their behalf on issues related to wages and working conditions more broadly (Eurofound, 2025). These forms of representation are institutionally recognised and supported whether union or non-union. Within this wider landscape of voice and representation, this chapter focuses on two types of initiatives: grassroots led and institutional led initiatives – both of which may involve elements of digital organising among NSWs.

Defining grassroots initiatives

Grassroot initiatives are here understood as collective actions by self-organising groups of workers that initially emerge outside the established representation and voice structures with the aim to collectivise the discontent of NSWs to improve the quality of precarious work. Their focus is generally on workers facing low pay, limited job security, marginal or hyper-flexible working time, and/or restricted worker representation or specific vulnerabilities such as migration exploitation or algorithmic management. Grassroots initiatives often start small and locally, but may grow into sectoral, occupational, national or transnational movements. In many cases, reflecting the composition of the NSWs workforce, grassroots initiatives often explicitly link precarious work to wider social issues such as migration, gender, or ethnicity – highlighting intersecting vulnerabilities and the need for an intersectional approach. By connecting workplace issues with broader concerns and discontent in their communities, they create space for wide-ranging (local) advocacy coalitions.

Defining Institutional led initiatives

Institution led initiatives are here understood as initiatives for worker voice and representation that emerge within already established organisations aiming to support NSWs and/or reducing precarity through social dialogue. They encompass a diverse group of possible organisations which cannot easily be defined. They can be worker, union, employer, NGO or government led as well as initiated by professional organisations (i.e. organizations focusing on specific professions) or trade associations (i.e. organizations focusing on companies' 'product market interests'; Traxler, 2008). These initiatives share the common feature of being anchored in established institutional structures that aim to influence public opinion and public policy related to the interests of a particular group of workers, to standard-setting organisations (e.g. in the textile industry), to informal networks or communities, etc. The literature on these initiatives, especially, related to their dialogue practices, is limited and largely case based. In this chapter, we focus specifically on alternative non-union models of worker voice and representation as union-led channels are reviewed in chapter 6.

Means of actions and social dialogue

Both institutional and grassroots initiatives can take many forms, ranging from information and education campaigns, legal support, public and media campaigns to raise awareness to more traditional means of industrial actions involving strikes, picketing, boycotts, as well as collective bargaining and social dialogue. This is why we here draw on the work by Dasgupta and colleagues (2025) and distinguish between four broad types of means of actions to capture this diversity: 1) the utilisation of public spaces (i.e. demonstrations, campaigns, traditional industrial actions such as strikes, campaigns, picketing etc.; 2) the usage of traditional and alternative channels for union and non-union worker voice and social dialogue, including lobbying, collective bargaining and tripartite consultations), 3) digital form of organising and communication and 4) reliance on the juridical system through legal litigation and case law.

The means of actions underpinning the different grassroot and institutional led initiatives often hinge on the power resources available to individual organisations which may be grassroot movements, alternative non-union organisations or traditional trade unions. The literature identifies several broad categories of power resources, including associational power resources, institutional power resources, coalitional power resources and ideational power resources and structural power resources (for a recent discussion see Refslund & Arnholtz, 2022, see also chapters 3 and 6). Different organisations draw on these power resources in distinct ways: trade unions and professional bodies typically rely on institutional and associational power resources, while advocacy organisations and many grassroots movements depend more on ideational and coalitional power resources.

Power resources in grassroot and institution led initiatives

Most grassroots initiatives tend to suffer from scarce financial and human resources, often relying on volunteers and low-cost forms of support. While grassroots initiatives may over time grow and professionalise as independent organisations, or merge with other organisations, including trade unions, they are initially weak in institutional power due to their novel, bottom-up nature. They often emerge outside the established industrial relations regimes but may over time become increasingly embedded within these regimes. Research suggests that grassroots initiatives tend to complement, substitute or even compete with the more traditional union-led voice channels (see section 7.4 below). Grassroots initiatives are also weak in terms of associational power resources, at least initially, because of their novel and localized nature. Their structural power resources, i.e. their ability to interfere with production processes (of goods and services) or with distribution varies by activity. Structural power resources can be divided into two categories: workplace power and marketplace power. Workplace power refers to the extent to which employers are dependent on the workers: what damage can workers do by laying down or slowing down their work, and how easily can the employer replace them. An example here can be riders distributing food. When they go on strike, they severely interrupt distribution processes. At the same time, they are often quite easily replaced. Marketplace power refers to the general level of opportunities that the overall labour market offers and what the ability of the workers to change jobs is. Here,

overall levels of unemployment matter, but also the types of skills and experience the workers have.

The power resources often used extensively by grassroots initiatives are coalitional power resources and ideational power resources. Coalitional power resources refer to the ability to form coalitions with other groups or collective actors. Grassroots initiatives often develop strong and organic links with their local community and advocacy groups that support their cause, possibly not principally based on their worker identity alone, but rather based on their more complex identities, combining being a worker, a citizen, a migrant, a woman, and/or other dimensions. Ideational power resources are habitually at the core of grassroots initiatives, they often include strong public awareness-raising components, building on calls for social justice, decent work and an end to exploitation and discrimination.

Institution-led initiatives rely far more on institutional, structural and associational power resources. Trade unions and established forms of alternative non-union organisations such as professional organisations are institutionally anchored and often supported by more steady income sources coming from membership fees etc. They are also able to draw on both organisational and professional human capacities to assist with influencing and improving the work quality of NSWs. Their embeddedness within national industrial relations regimes— through collective bargaining (trade unions) and/or social dialogue (non-union organisations, professional organisations etc.) give them strong institutional and associational power resources. Trade unions and alternative non-union organisations capacity to disrupt production processes provides greater structural power resources than most grassroots movements. Historically, these organisations, notably trade unions, have relied on these power resources to push for regulatory changes and lift wage and working conditions for NSWs (Doellgast et al., 2018; Carver & Doellgast, 2021; Boonstra et al., 2012). However, there are also evidence that the very same power resources have been used to protect what core members, leaving NSWs less protected (Keizer et al., 2024; Keune, 2015; Rubery, 1978; Lindbeck & Snower, 1988; Larsen, 2011). The declining union density has increasingly encouraged trade unions to build coalitions with other organisations, including grassroots movements and alternative non-union organisations.

Grassroots initiatives for voice and representation among NSWs

A growing body of research examines grassroots initiatives for voice and representation among NSWs that emerge outside the traditional trade union movement and the established industrial relations structures (Taras, 2002; Tavora et al. 2025; Joyce et al. 2023). Although alternative models of worker voice and representation have historically co-existed alongside trade unions, recent studies increasingly focus on the rise of grassroots models for voice and representation among NSWs. This type of research has especially mushroomed around platform work, where novel forms of collective representation, social movements or grassroots based unionism have emerged in both the conventional and online labour markets (for a systematic literature review, see for example Dasgupta et al., 2025; Masta & Kaushiva, 2024; Pilatti et al., 2025). Other groups of NSWs have attracted less attention, though recent studies highlight grassroots mobilisation among freelancers, solo self-employed, workers with zero-hour contracts and other precarious

groups in specific sectors (Signoretti et al. 2025; Alcalde-González et al., 2024; Andersen, 2020; Dorigatti et al., 2022). Across these strands of literature, studies identify mechanisms shaping the emergence, development, effectiveness and sustainability of such initiatives as well as the social dialogue practices and power resources they deploy to strengthen NSWs voice, representation and working conditions. The following sections explore these dynamics in greater depth.

Grassroots initiatives –their emergence and development

Research suggests that grassroot initiatives for NSWs voice and representation often arise in the institutional void created when traditional trade unions fail to adequately represent these workers. Some scholars such as Heery et al. (2010) and Tapia et al. (2015) link the growth of grassroots initiatives to shrinking union densities and to government approaches such as in the UK, where the government increasingly involves civil society organisations in policy areas of traditional industrial relations (Tapia et al., 2015; Heery et al., 2010). Others argue that non-union forms of representation, especially flourish at workplace level in industrial relations settings marked by union avoidance and conflictual management-employee relations, where employers may initiate such structures to limit or bypass union influence (Donahy et al., 2021; 2022; Guarin et al., 2025).

Studies also suggest that NSWs often develop alternative channels for voice and representation because they experience inconsistent union engagement and feel their interests are marginalised or overlooked within the trade unions, in union-management negotiations or policy-making processes (Mackenzie, 2010; Joyce et al., 2022; Signoretti et al., 2025). Even when unionised, NSWs typically experience lower wages, less favourable working conditions and weaker representation than workers in standard full-time employment regardless of collective bargaining coverage (Lewschuk, 2021; Barton et al., 2021; Keune & Pedacci, 2021; Scheur, 2011; 2017; Keizer et al., 2024). These inequalities intensify in times of crisis, where unions often prioritise protecting core members, leaving NSWs with weaker protection (Rueda, 2007; Keizer et al., 2024; Bekker et al., 2025). The COVID-19 pandemic is the most recent example, exposing structural inequalities in national protection systems and relief schemes that disadvantaged NSWs despite later adjustments by national governments and social partners (Bekker et al., 2025; Larsen & Ilsøe, 2022; Jesnes et al., 2025).

While grievances, injustice and unfairness are considered key for worker mobilisation, the literature also underscores the importance of contextual factors such as collective identity formation and leadership in turning discontent into collective actions (Cini, 2023; Lopez-Andreu, 2020; Simms & Dean, 2015; Kelly, 1998; Ibsen & Tapia, 2017). For example, Dasgupta and colleagues (2025) evidence that contextual factors, including the type of platform work, worker characteristics, supportive communities, institutional settings (i.e. industrial relations system, workplace etc.) and socio-political heritage shape the form of worker voice, and the likelihood of successful mobilisation. Similarly, Cini (2023) in his work on understanding the underpinning dynamics of various collective actions in the platform economy points to the important role of supportive online and local communities as well as the heritage of political activism in fostering solidarity and enabling grievances to be channelled into collective actions. Recent studies of

Spanish grassroots initiatives (Las Heras & Ribera Almandoz, 2017; Alcalde-González et al., 2024; Lopez, 2020) further demonstrate how rising unemployment, economic recessions and widening inequalities combined with union failure to represent NSWs and resist unpopular policy reforms fuelled the rise of these movements.

Different studies also stress the importance of collective identity formation and leadership in transforming worker discontent into collective actions (Lopez-Andreu, 2020; Petrini & Wettergren, 2022). For example, Lopez-Andreu (2020) illustrates the development of solidarity and collective identity among NSWs in Spain that experience injustice does not, alone, fuel mobilisation. Instead, occupational memory and the collectivisation of grievances around dignity, recognition and treatment of workers as humans help overcome workplace fragmentation and foster solidarity (Lopez-Andreu, 2020). Other research similarly emphasises identity and collective solidarity as crucial for sustaining both grassroots and institutional led initiatives (Simms & Dean, 2015; Holgate, 2015). The literature, however, offers mixed views on leadership. Some stress the important of collective leadership in channelling social unrest while others argue that leadership - whether union led or not - cannot guarantee mobilisation without "spontaneous solidarity", which emerges in certain situations and creates alternative spaces for collective action (Atzeni, 2009; Lopez-Andreu, 2020).

Efficiency and sustainability of grassroots initiatives

Although various studies explore the emergence of grassroots initiatives among NSWs, most provide only a snapshot with far fewer analysing how such initiatives evolve and sustain themselves over time. Notable exceptions are the work by Las Heras and Ribera Almandoz (2017), Alcalde-González et al. (2024) and Lopez (2020), and their longitudinal in-depth case studies of grassroots initiatives in Spain, where they illustrate how these initiatives materialise, evolve and inspire other collective actions. For example, Las Heras and Ribera Almandoz (2017) illustrate how the 15-M movement (a massive anti-austerity, pro-democracy protest in Spain from 2011) successfully challenged the dominant austerity narratives and opened new spaces for collective action outside the traditional trade union channels. Similarly, Alcalde-González et al. (2024) show that the sustainability of Las Kellys (a self-organising grassroots movement led by a group of precarious migrant women working as room attendants in the Spanish hospitality sector) stems from its origins in the gaps between labour and feminist movements, its critique of trade unions neglect of these workers and its ability to engage with, compete against and differentiate itself from unions while offering relevant services to members. Other work such as Cini (2023) also stresses the importance of drawing on past grassroots successes, tapping into existing communities and political heritage to build solidarity, sustain mobilisation and transform it into ongoing collective actions.

Some studies also explore why certain grassroots initiatives may fail, despite initial signs of success. For example, Hau and Savage (2023) show how a group of food delivery couriers in Denmark developed an online community (i.e. the Wolt's workers group) and formed alliances with Danish trade unions yet struggled to secure a collective agreement despite protests and wildcat strikes. This illustrates that mobilisation does not guarantee improvements in wages and working conditions (Larsen et al., 2021; Hau & Savage, 2023). Legault and Webster's (2021) longitudinal study of worker

mobilisation in the Canadian videogame sector similarly explore why even highly skilled NSWs struggle to mobilise: the industry's project-based business model fragments worker voice and disconnect the real employer (investor/clients) from workplace bargaining, leaving workers with little leverage and employers with limited bargaining authority. These structural barriers echo challenges identified in the wider research on worker voice in multi-national companies, public procurement and subcontracting chains.

Means of Actions and Social Dialogue

The literature highlights diverse means of actions and social dialogue practices used by grassroots movements, which can differ from, but also complement, the conventional channels of collective workplace representation (Dasgupta et al., 2025; Joyce et al., 2023; Alcalde-González et al., 2024). These movements often adopt more radical strategies than trade unions and professional organisations, which tend to seek dialogue and rely on established voice channels such as workplace bodies, tripartite consultations and collective bargaining.

Traditional means of industrial actions with a twist: Traditional means of industrial actions such as strikes, wildcat strikes, picketing, work to rules, work stoppage, campaigns and demonstrations etc. are well-documented in research on grassroots initiatives (Joyce et al., 2022; Hau & Borello, 2024; Holgate, 2015; Heras & Ribera Almandoz, 2017). However, their modes of mobilisation tend to differ from more traditional industrial actions as grassroots movements heavily rely on digital tools, social media platforms (WhatsApp, Facebook, LinkedIn, Slack etc.) and online networks to communicate, organise and mobilise workers across both online and offline labour markets (see also section 5.6). Their actions also extend beyond the workplace into public spaces through mass demonstrations, social media campaigns, using both traditional outlets and newer platforms such as TikTok, Snapchat, Facebook, LinkedIn etc. to influence public debate (Cini, 2023; Joyce et al., 2023; Holgate, 2015). Studies further imply that civil disobedience and targeting company image brands often complement the traditional means of industrial actions (Las Heras & Ribera Almandoz, 2017; Lopez-Andreu, 2020).

Coalition-building and social dialogue practices: Research demonstrates that grassroots movements frequently build coalitions with social movements, civil society organisations, public authorities and most commonly traditional trade unions to push for regulatory changes and improved working conditions. Most studies explore coalitions between grassroots movements and traditional trade unions with less attention to collaboration with other key stakeholders. There are several examples of grassroots organisations, especially in the platform economy, teaming up and building coalitions with traditional trade unions to participate in collective bargaining and tripartite consultations in countries such as Belgium, Denmark, Italy, Norway, Spain, the Netherlands and the UK with mixed outcomes (Hau & Savage, 2003; Cini, 2023; Holgate, 2015). Since grassroots movements are like most alternative non-union organisations not legally recognised as a legitimate bargaining party in most European countries (i.e. Belgium, France, Italy, Spain, the UK), collaboration with recognised unions provides a key route into formal social dialogue, although Denmark stands out with no statutory recognition requirements, but only voluntary recognition by employers applies. These dynamics are

especially visible in mobilisation of food delivery couriers, taxi drivers and logistics workers, whose collaboration with traditional trade unions and other key stakeholders have figured prominently in the recent public debates and academic literature (see for instance, Cini, 2023; Hau & Savage, 2003; Mare et al., 2023; Lopez et al., 2024; Vandaele & Rainone, 2025; Joyce et al., 2023).

Similar forms of coalition building between grassroots movements and traditional trade unions are evident in other parts of the platform economy – i.e. domestic cleaning – as well as in the conventional labour market (Valestrand, 2024; Vandaele & Rainone, 2025; Holgate, 2010; 2015; Wills, 2008; Peró and Downey 2024). An illustrative example includes the union supported community coalitions campaigning for better conditions for cleaners at the Dutch Airport Schiphol (Boonstra et al., 2012). Another example is the UK “Justice for Cleaners” living wage campaign initiated by TELCO (later Citizens UK), which spread to other UK cities and inspired new grassroots and quasi trade union organisations such as the Independent Worker of Great Britain (IWGB) and the United Voices of the World (UVW) (Holgate, 2010; Simms, 2011; Wills, 2008; Alberti, 2016; Petrini & Westergreen, 2023; Peró & Downey, 2024). Nation-wide demonstrations to improve childcare quality and childcare staff’s working conditions in Denmark, Canada and the UK similarly reflect coalition building between grassroots movements, professional groups and trade unions (Larsen & De La Porte, 2022; Herman et al., 2024).

Some grassroots movements among NSWs do not collaborate with traditional trade unions but instead compete with them, forming alliances with employers and public authorities to bypass and weaken union influence (Lopez-Andreu, 2020). This is nothing new and is also illustrated by the historical mixed landscape of employer or state-supported non-union bodies such as yellow unions, works councils, committees, EDI commissions etc. operating alongside or in place of unions (Donaghey, 2022; Heckscher & Carré, 2006; Alcalde-González et al., 2024; Tavorra et al., 2025).

Legal litigation and case law rulings are also pathways increasingly used for NSWs voice, grievances and worker mobilisation, often supported by trade unions that help bring cases before civil and labour courts with mixed outcomes (Lewshuk, 2021; Boonstra et al., 2012; Dasgupta et al., 2025; Aloisi, 2021). Platform workers in particular have used litigation to challenge their classification as self-employed, prompting numerous rulings across Europe, the USA and Australia on their employment status. In Denmark, public authorities, including tax, competition and migration authorities have also ruled on the classification of platform workers (Munkholm et al., 2021).

Beyond platform work, other NSWs groups have collaborated with trade unions to contest low wages and poor working conditions through the courts with ripple effects for regulatory practices within specific national, sector or workplace contexts (Boonstra et al., 2012). At EU level, cases brought by NSWs or their unions before the European Court of Justice have contributed to regulatory changes in areas such as fixed-term work temporary agency work and posted work (De la Porte & Emmenegger, 2016; Kullmann, 2024; Arnholtz, 2022).

Power resources – A mix of strategies

Our literature review suggests that grassroots initiatives draw on a mix of power resources to influence wage and working conditions. Coalition building across diverse stakeholders reflect their widespread use of coalitional powers (Las Heras & Ribera Almandoz, 2017; Joyce et al., 2023; Boonstra et al., 2012; Alberti, 2016). Their attempts to shape public debate through campaigns and social media stories point to extensive reliance on discursive power and often more so than their reliance on other sources of powers (Las Heras & Ribera Almandoz, 2017; Però & Downey, 2022; Hau & Borello, 2024; Wills, 2008; Holgate, 2015). Mass demonstrations, nation-wide or local campaigns further point to their ability to mobilise associational power, although in more fluid and ad hoc ways than traditional trade unions. Lacking stable membership structures, grassroots movements typically rely on social media platforms, apps and informal networks for mobilisation (Hau & Savage, 2023; Cini, 2023; Lopez et al., 2025; Petrini and Wettergren, 2022).

Research further evidences that institutional power resources often associated with worker voice and representation such as trade unions, collective and individual bargaining and tripartite consultations typically are outside the reach for many grassroots groups due to their very bottom-up nature, weak anchoring within the established industrial relations system and often scarce financial resources as well as heavy reliance on volunteers (Joyce et al., 2023; Cini, 2023; MacDonald & Koltakar, 2021; Lopez Martinez et al., 2021). By contrast, legal litigation has become a more accessible institutional power resource as workers can individually or collectively approach the civil courts, sometimes with free legal support or pro-bono representation. However, access to labour courts, arbitrations and tribunals often depends on union backing and the ability to cover fees, which limits opportunities for NSWs and grassroots groups. In countries such as Denmark, where only trade unions, not individuals, can bring cases before the labour courts or tribunals, the barriers are even more pronounced.

Illustrative examples

- **Living wage campaign and Justice for Cleaners Campaign UK** were launched in 2021 by the by the grassroot movement TELCO (now Citizens UK) to raise awareness of precarious wage and working conditions in public procured cleaning work in London, working closely with trade unions and other groups. The campaigns spread to other UK cities and inspired new grassroots initiatives and helped to pave the way for emerging quasi trade unions such as the Independent Worker of Great Britain (IWGB) and the United Voices of the World (UVW) (Holgate, 2010; Simms, 2011; Wills, 2008; Alberti, 2016; Petrini & Westergreen, 2023; Però & Downey, 2024)
- **15 M-movement** was a major Spanish grassroot mobilisation initiative from 2011 protesting austerity amid rising unemployment, economic recession and rising inequalities. At the same time, collective bargaining had gradually shifted to the company level, while the traditional trade unions favoured the conventional corporatist social dialogue and failed to engage rank and file members and represent NSWs, contributing to fragmentation and social unrest (Las Heras & Ribera Almandoz, 2017). The movement inspired subsequent grassroots actions such as Panrico workers' strike –

and helped to pave the way for alternative spaces for collective actions outside the established Spanish trade union structures, challenging the traditional channels of worker representation in Spain (Heras & Ribera Almandoz, 2017, Alcalde-Gonzales et al. 2024).

Institution-led initiatives for voice and representation among NSWs – the case of non-union organisations

Institutionalised, non-union organisations are not, as such, a broad theme in the literature, largely because they encompass a wide variety of forms and purposes. Here we distinguish between three types: (1) organisations representing self-employed; (2) organisations representing professions and (3) organisations representing social groups (e.g. migrants, youth, women). Such organisations can emerge in different ways. In a top-down approach, they can be purposefully established by public authorities, trade unions, employers' organisations, NGOs, etc. with the goal of representing certain groups of non-standard workers. Bottom-up approaches can be the institutionalized outcome of a grassroots type of initiative. Here we will briefly discuss the three types.

Organisations representing self-employed

The self-employed are a specific type of non-standard workers that are neither employers nor employees. Their numbers have been growing substantially in several EU countries in recent years, especially in services and construction (Conen & Schippers, 2019). The self-employed constitutes a very diverse group, ranging from some very well-off and other highly vulnerable. In particular these new self-employed are often considered precarious, with low income, poor career and development prospects and in many cases in practice working as an employee, without the respective labour and social security rights (Conen & Schippers, 2019).

The interests of the self-employed vary substantially as well. Still, they are often considered to be one group with interests that differ from those of employers as well as employees. Traditionally, they have been poorly accommodated in European industrial relations systems, with no proper representation (Mezihorak et al., 2023; Jansen, 2020). However, in recent decades this seems to have changed. With the growth of their share in the labour market, new organisations aiming to represent their interests have sprung up in many countries, some established by trade unions, some by employers' organisations and others as new independent organisations (Razzolini 2021; Westerveld, 2012; Mezihorak & Murgia, 2024; Pernicka, 2006; Jansen, 2020). For example, in the Netherlands, the interest organisations of the self-employed even obtained two seats in the bastion of organised consultation, the Socio-Economic Council (Westerveld 2012). Through these forms of representation, the self-employed can, alongside other worker groups, address issues related to precariousness.

Organisations representing professions

This type of organisations focuses on representing the interests of professions, independent from whether the professionals are (standard or non-standard) employees, self-employed or employers. This reflects the identity of workers in these occupations is not bound strongly to their labour market position but rather to their profession. Also,

they do not necessarily focus on precarious work. Traditional examples are the guilds, and later the organisations of doctors, lawyers or artists, while over time, many more of such organisations have emerged, ranging from journalists, to engineers, to notaries, to translators/interpreters, to creative workers (Friedman & Afitska, 2023). They can play a role in addressing precarious work by regulating (access to) the profession, by setting standards for the profession, in lobbying for policy change, etc. Been and Keune (2019) show that they also set non-binding but effective rates for different tasks in the design industry. At the same time, Dorigatti et al. (2023) show for the game industry that the professional organisations or trade associations often focus mainly on fostering the competitiveness of the sector, showing little attention to the weakest workers in the sector.

Organisations representing social groups (migrants, youth, women)

There is a plethora of organisations representing the interests and/or aiming to improve labour standards of specific groups of NSWs and precarious workers in Europe, including migrants, young people, platform workers and women. These are often NGOs operating at the national or transnational level. An example of a nationally operating organization is Fairwork, a Dutch NGO focused on improving the conditions of exploited migrant workers, specifically nannies, au pairs and in-living care professionals; temporary agency workers; and undocumented workers (Hajer et al. 2025). An example of a transnationally operating NGO is (curiously also named) Fairwork, promoting equity and accountability in the platform economy, first and foremost through research and setting, measuring and publishing the extent to which platform companies offer fair labour standards (Graham et al., 2020). There is however little to no systematic literature analysing the activities and impact of such organisations.

Digital representation and organising

This section considers the role of digital organizing in novel forms of collective voice and social dialogue among NSWs. The prevalence of digital tools has not only transformed work and employment relations, epitomised in the rise of platform-based work, but also reshaped how workers and institutions build collective voice. As Dasgupta et al. (2025) describe it, the 'how' and 'why' of voice has evolved in the digital age within the platform economy. Building on the definition of voice cited above (section 7.2), we define digital organising as technology-mediated approaches to engage and mobilise workers in collective actions, providing critical channels to 'influence key stakeholders' and 'advance their interests'. While there is a substantial body of literature considering the changing employment relationships which has emerged through the digital revolution, this is largely outside the scope of this chapter. Instead, in this section, we consider how digital tools and approaches (or mechanisms) have changed the means of actions which workers deploy when seeking to utilise their collective choice. As will be seen below, these tools have facilitated a broadening of the target of collective voice beyond the traditional employer-employee domain to include labour intermediaries, policy makers, the public and peers.

Digital organizing cuts across both the grassroots initiatives and the institution-led activities discussed above. It warrants separate consideration due to its transformative

role in shaping collective actions across both domains. By encompassing tools, online communication and engagement platforms and practices that enable non-standard workers to build voice, representation and social dialogue across the online and the conventional labour markets, digital organising introduces novel dynamics that challenge the traditional industrial relations frameworks. This section examines these elements as distinct, cross-cutting dimensions of social dialogue and voice among non-standard workers.

Much of the literature reviewed in this section centres on the platform economy. The digital revolution has not only transformed employment relationships by enabling platform work but has also opened new avenues for organising through digital tools, extending beyond platform workers to other non-standard forms of work. While the literature is heavily focused on platform work, where possible we include illustrative examples from the literature of digital organising from other sectors and forms of employment. In the following paragraph, we first consider the conditions under which digital organising and voice emerges which is followed by a review of the means of action commonly seen in this domain. We then consider the efficacy and substantiality of the means of action enabled by digital organising before exploring the power resources deployed along with a selection of illustrative examples of digital organising among NSWs.

Emergence or enabling conditions

Despite the challenges related to the fragmented and individualised nature of platform work, new forms of collectivised action have emerged (Cini, 2023). The spatial organisation of platform work often dictates the nature of the organising (Johnston, 2020). Crowdwork or online, global tasks often lead to spatially displaced workers, who experience isolation while place-based or on-location work facilitates the physical proximity, which has led to stronger mobilisation of self-organised collectives (Joyce et al., 2023; Johnston, 2020). The physical workplace can strengthen collective mobilisation and enables more conflictual actions such as strikes (Cini, 2023).

Digital communication technology and social media platforms are significant enabling factors for crowdwork organisers to facilitate collective solidarity and collective identity formation, mutual support, sharing grievances, and campaign building (Borghi et al., 2025; Joyce et al., 2023; Cini, 2023). Workers are leveraging online communities and social media, such as WhatsApp and Facebook groups to overcome the spatial challenges. These efforts are often supported and shaped by non-institutional factors such as the presence of a supportive community and a heritage of political activism in a broader context, which provides workers with resources, scripts and organising skills (Cini, 2023). Digital networks are often essential elements of social infrastructure for migrant workers coping with precarious working environments and providing peer support (Hau and Borello, 2024; Hau and Savage, 2023). Early adopters of digital organising tools include freelance journalists who utilised email lists and social media to coordinate boycotts and strikes. These digital tools are also increasingly used by traditional trade unions to mobilise and service their members, most recently evidenced during the sector-level bargaining rounds in Spain and Denmark (Salamon, 2016; Hau et al., 2025).

Means of Actions

In a review of worker voice within the platform economy, Dasgupta et al. (2025) identify four means of grassroots voice. Building on their framework, this section considers the means of action utilised by NSWs which are enabled or facilitated by digital tools.

In both platform environments and other forms of NSWs, digital tools are widely used to build *peer-to-peer support* and *networks for mutual aid* and sharing of workplace experiences (Dasgupta et al., 2025). The dispersed nature of much platform work makes online organising particularly significant. However, there are also examples of organising within more traditional sectors such as brewing and the public sector, where the Covid-19 pandemic led to the formation of 'solidarity-networks' built through Zoom calls and various social media platforms (Anderson and Jenkinson, 2023; Hau et al., 2025; Hau and Hansen, 2024).

Virtual spaces also enable workers to communicate outside of the monitoring and surveillance systems associated with the workplace or labour platforms (Dasgupta et al., 2025; Wotschack et al., 2024). In the platform economy, online forums, ranging from Facebook to Reddit and WhatsApp, enable sharing of resources for coping with difficult clients, changes to algorithms, platform policies, issues of under- or non-payment and sharing of grievances. Cini (2023) shares the example of workers on Amazon Mechanical Turk creating forums and online networks to overcome the isolation experienced in crowdwork, share grievances, and develop a sense of collective solidarity. One such forum, Turkopticon, experienced workers supported newer workers on the platform by sharing personal experiences and insights while also coordinating campaigns and activities such as digital strike actions (Cini, 2023; Woodcock, 2021). The digital communities are seen to enable workers to overcome the information asymmetry that is common in platform work – it creates a system for reviewing clients (while the platform only allows for reviewing of workers) and discussing issues related to platforms' payment policies and fairness (Cini, 2023).

The example of Turkopticon, spans both the role of digital tools in creating peer-to-peer support and developing *alternative worker-organisations*, discussed below. Likewise, peer-to-peer support or mutual aid activities that start in the digital forums of WhatsApp or Facebook may transcend from the online room into the physical world, which is seen in the creation of shared pick-up points used by couriers and delivery workers (Dasgupta et al., 2025).

Dasgupta et al.'s (2025) second dimension of grassroots voice which has a bearing in our review of the digital organising, is the development of alternative, worker-led organisations, which originate as online communities. These small online collectives, can evolve into powerful channels for collective voice, as seen above in the example of Mechanical Turk workers where small groups grew into a powerful collective voice (Cini, 2023). Però and Downey (2024) highlight the impact of self-organised workers evolving into 'indie' unions to support precarious, mostly migrant workers in London. Although indie unions lack structural power resources associated with more formal trade unions, they deploy discursive powers to frame workplace grievances with public discourse (a practice they call 'communicative unionism') (Peró & Downey, 2024).

Alternative worker organisations which often lack structural power, may build alliances with trade unions, political parties, academics and lawyers. These alliances often hinge on reframing workplace grievances as broader social justice issues, embedding them within narratives of equity and rights (Peró & Downey, 2024; Dasgupta et al., 2025).

Voice for visibility is the third element of the grassroots voice mechanism. For many NSWs, the nature of the work or their personal status can render them invisible. This is particularly true for platform workers, but also for vulnerable groups such as migrant workers. Digital tools have been widely deployed to increase the visibility of NSWs. For instance, workers on the Amazon Mechanical Turk platform engaged in a letter writing campaign targeting platform owner Jeff Bezos, to let him and the world know that “*Turkers* are not only actual human beings, but people who deserve respect, fair treatment and open communication” (Salehi et al., 2025 quoted in Cini, 2023, p. 135, emphasis in original). Courriers in London engaged in critical-mass ride outs in London, travelling in groups to customers offices to garner media attention (Joyce et al., 2023). The slow public road show, though of mixed success, increased the visibility of these workers among clients and managers.

The fourth and final framework for voice mechanisms is the use of digital tools for worker organising in support of legal confrontations. In what Dasgupta and colleagues (2025) refer to as ‘confrontation via the judicial systems’, digital tools are utilised to develop strategic campaigns and organising efforts, which target not only employers but also public policy and the legal system more broadly. Tactics include the use of strategic litigation and class action lawsuits, which seek to challenge broad issues such as misclassification of employees. Some court cases aim to change the legal framework, not only through rulings but also by influencing negotiations with employers and shaping broader policy debates, including migration and employability. In these efforts, worker-led organisations may be supported by traditional trade unions (Bonifacio & Marcolin, 2024).

Assessment of the effectiveness (longevity)

The effectiveness of digital organising is often measured by its ability to achieve tangible gains (pay increases, legal victories), and to sustain these efforts over time. Mobilisations and actions are often combined with traditional or familiar tactics such as strikes or demonstrations with newer approaches like coordinated log-offs and social media campaigns (Joyce et al., 2023; Woodcock & Cant, 2022). However sustained power and inertia remain complex. Loose networks, while important for rapid mobilisation might lack the necessary structure for longer-term power (Hau & Savage, 2023). Longevity is enhanced when organising efforts combine institutional and symbolic resources, a combination named as ‘socio-emotional organising’ by Bottalico and Murgia (2024). Members of the worker collective Redacta explained that they had to maintain ‘two engines’, one which leveraged emotional resources (frustration over precarity) as a means of building collective identity and the other to engage in institutional action, namely influencing the policymaking process (Bottalico & Murgia, 2024).

Outcomes, such as collective agreements, may also face limitations regarding their effectiveness and inclusive. The Just Eat Takeaway agreement in Italy, for example,

introduced standard employment contracts and expanded social and employment rights, but was seen as factoring less vulnerable riders at the expense of the more numerous and economically dependent riders (Bonifacio & Marcolin, 2024). These agreements may also cover only a portion of the overall workforce and enforcement is often difficult.

Platform companies may also implement counter-practices to undermine efforts at growing worker power. This may include firing activists, penalising workers deemed to be problematic, and making strategic algorithmic changes to limit action (Jesnes, 2023).

Power Resources and Capabilities

Lacking structural power within platform economies, workers and organisers rely more heavily on associational and discursive power (Wotschack et al, 2024; Lopez et al, 2025; Joyce et al., 2023). Discursive power will result from successful cooperation with the broader society, leveraging support in public discourse. This is essential for many precarious workers to compensate for a lack of material and institutional resources. Indie unions may utilise communicative unionism, which integrates direct action and self-mediated messages designed to resonate morally with mainstream media channels (Peró & Downey, 2024).

An emerging capability in digital organising is 'worker data science', where workers collectively seek to gain insights into obscured algorithmic management systems used by platforms to manage work and workers (Gallagher et al., 2025). The case of organising a global alliance for platform workers, (Borghi et al., 2025) highlights how grassroots digital organising's discursive powers can be combined with institutional and structural powers found in trade unions. The trade union provided resources such as online meeting capabilities and simultaneous translation to support worker-led organisations to engage in cross-national campaigns.

Illustrative Examples

Just Eat Takeaway Agreement, Italy – (Bonifacio & Marcolin, 2024) – Highlights the tension between regulation and heterogeneity of the workforce. The company-level agreement introduced a standardised employment contract which increased rights and protections. However, it failed to recognise the diverse interests of different rider types (theorised in the paper as entrepreneur, labourer and explorer).

Foodora, Norway (Jesnes, 2023; Lopez et al., 2025) – Although the platform initially adopted a traditional employment model which enabled collective agreements and secured worker rights, changes to the market with the arrival of new competitors changed the dynamic. Competitors use of self-employment models prompted Foodora to shift its own strategy.

Wolt Workers' Group (WWG), Denmark (Hau & Savage, 2023) – Representing migrant couriers, WWG used Facebook to operate as a non-hierarchical and autonomous network. They were supported by an established trade union (3F) through a 'social media unionism' strategy which provided the network with resources while not challenging its autonomy.

Workers' Observatory (WO), Scotland (Gallagher et al., 2025) – The WO is a collaboration between couriers and researchers to understand the opaque system of algorithmic control, particularly dynamic pricing. Workers analysed data, submitted via screenshots) developing 'worker data science' capabilities.

Conclusions and new avenues for research

This literature review highlights several important insights and knowledge gaps within the literature related to novel forms of voice and representation among nonstandard workers. We find among others that while there have been a series of systematic literature reviews of especially grassroots initiatives within the platform economy, there are hardly any systematic or scoping reviews when it comes to grassroots initiatives for other groups of NSWs and especially when it comes to institution-led initiatives for NSWs among non-union organisations. Our literature review further evidences that while there is a series of rich in-depth case studies, often characterised as single or one to two national country case study comparisons, exploring selected local grassroots initiatives and their emergence, the broader cross-cutting insights into alternative non-union and grassroots models for voice and representation are less researched. Comparative analysis remains rare, with scholarship dominated by single-country case studies rather than cross-national or cross-sectoral comparisons. This calls for analytical frameworks able to capture and provide broader insights into the emergence, evolution and sustainability of these initiatives across and between groups, workplaces, sectors, countries and multiple levels. In addition, research tends to focus on the relationships between grassroots initiatives and traditional trade unions, while paying less attention to their collaboration with other organisations and stakeholders such as employers, public authorities, civil society and social movements. Platform work has attracted a disproportionate amount of analytic and research focus among NSWs, possibly overshadowing other grassroots initiatives working with other groups of NSWs.

When diving further into the literature, our review suggests that grassroots movements often adopt more radical approaches than traditional trade unions and non-union organisations, challenging established norms and experimenting with new strategies (Signoretto et al., 2025). These initiatives often combine conventional industrial actions with innovative twists – relying heavily on digital tools to raise awareness, mobilise workers, organise activities and create channels for worker voice. However, much of the literature offers only a snapshot of grassroots activities with only few studies exploring the evolution and sustainability of these initiatives over time.

These gaps raise a series of new research questions that to several promising avenues to future research:

- How do different institution-led (non-union) initiatives and traditional grassroots initiatives among NSWs evolve over time? What are the mechanisms that contribute to the sustainability of these?
- What is the role of intersectional identities of NSWs beyond their employment situation for framing and developing and sustaining grassroots and institution-led (non-union) among NSWs?

What is the role of digital tools in shaping and enabling grassroots initiatives and institutional led initiatives? grassroots

- How does the national institutional setting and context such as industrial relations regimes, business models etc. influence grassroots and institution led initiatives and result in different trajectories and sustainability?
- Why has platform work unlike other forms of NSWs attracted so much academic attention when it comes to researching bottom-up initiatives that are institution led or grassroots led?
- Why are we mainly seeing innovation and innovative forms of worker voice and representation in the platform economy and less so among other groups of NSWs?
- Are grassroots initiatives and other non-union institutional led initiatives more prominent in some industrial relations regimes, sector and business models than others?

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8 Outlook

The present paper gave an overview of the literature concerning the subject of non-standard work and social dialogue. The various chapters discussed this subject from their particular angle. They also offer indications on what the issues and questions are that research on social dialogue and non-standard workers can fruitfully develop. Here they are summarized per chapter.

Agency of non-standard, precarious workers

- What are the identities and needs of non-standard workers?
- How do non-standard workers' identities and needs shape their engagement with collective action and representation?
- What forms of agency do non-standard workers exhibit and how are these shaped by individual, social and structural factors?
- How do employer motives and organizational strategies determine the structural and relational context in which non-standard workers exercise agency?
- How can collective organizations and trade unions effectively represent and mobilize non-standard workers?

Why should workers have a say and does it make any difference?

- Frameworks such as *Power Resource Theory* and *Labour Process Theory* emphasize collective representation and rights-based participation. These approaches rarely address how such mechanisms function for workers in non-standard employment.
- Within *Human Resource Management* and *Organisational Behaviour*, *voice* is often conceptualised as an individual-level phenomenon. The structural barriers faced by precarious workers have, until recently, received limited attention
- Employers' motives for involving or excluding non-standard workers from social dialogue and voice have been scarcely addressed in the literature.
- Current models and participation structures described in the literature, are to a large extent designed for insiders, leaving freelancers, platform workers, and temporary employees without effective channels for representation or influence. Empirical studies tend to reinforce these conceptual gaps.
- Limited understanding of how inclusive participation can be achieved seen from below in increasingly fragmented labour markets, where traditional mechanisms fail to reach those most vulnerable to precarity represent a knowledge gap.

Industrial relations and employment regimes

We then turn to the literature on how industrial relations (IR) and employment regimes across Europe shape social dialogue and worker representation for non-standard

workers. The review shows that IR systems characterised by coordinated, multi-employer bargaining and institutionalised social dialogue, particularly in the Nordic countries and parts of continental Europe, tend to be more inclusive of NSWs than liberal or fragmented regimes. However, legal frameworks for social dialogue remain largely built around a binary distinction between employees and the self-employed, which excludes or marginalises many NSWs operating in legally ambiguous employment relationships, such as platform work or zero-hours contracts.

- While regime typologies are useful for comparative analysis, the literature also highlights substantial within-regime variation. Sectoral studies further demonstrate that similarities across sectors often cut across national borders, and that unions' power resources at sectoral and firm level are often more decisive than national institutions alone.
- Overall, the literature suggests that inclusive social dialogue for NSWs depends not only on formal institutional arrangements, but also on union strategies, sectoral dynamics and the ability to mobilise and extend representation beyond standard employment relationships.
- While national and sectoral institutions are well covered in the literature, there is less systematic research on how firm-level representation functions for NSWs, and on how different representation models affect concrete outcomes for NSWs, such as job quality, pay, security and voice.
- Further, new business models are often discussed conceptually, but there is a lack of comparative empirical studies on how existing IR institutions are used, contested or circumvented in practice.

Business models and non-standard work

Several avenues for future research emerge from the provided literature review.

- The literature review has explored the prevalence of non-standard work across different business models, discussing the differentiated motivations employers have in relying on NSWs and their variation depending on the technical characteristics of work and the specific goal pursued by organisations. In so doing, it has focused on an under-researched area of analysis (employer strategies and motives), whose exploration is a major added value of the project.
- A focus on variation across business models (and not just national systems and employment regimes) allows to discuss structural variables which might be relevant in explaining the viability, content and effectiveness of collective representation of NSWs and might help overcome the institutionalist bias of most research on social dialogue and non-standard work.
- The literature review has discussed different typologies of use of non-standard work. However, an effort to update these typologies is in order, particularly given new developments driven by technological innovations (the spread of algorithmic management and of platform forms of organization), which might have distinguished characteristics and implications for social dialogue and non-standard work.

- Existing studies focus on explaining cross-national variation in the incidence of non-standard work, while much less is known about how different institutional configurations shape the representation of these forms of work. The project should move beyond measuring prevalence and systematically examine how labour market regulations, collective bargaining structures, and welfare regimes affect the capacity of social partners to represent non-standard workers.
- The literature highlights complementarities between EPL, collective bargaining, minimum wages, and social protection, yet their combined effects on representation outcomes remain underexplored. The project could investigate how specific institutional configurations either mitigate or reinforce representation gaps for non-standard workers.
- The high-road/low-road framework suggests that firms' competitive strategies shape their use of non-standard work, but the implications for worker voice are insufficiently explored. The project could analyse how different firm strategies affect the availability and effectiveness of representation channels for non-standard workers, including works councils, union presence, and alternative forms of voice. This would help clarify under which conditions non-standard work is compatible with participation and collective voice at the workplace.

Trade unions and non-standard workers

From the literature review a number of starting points for future research emerge.

- It is useful to continue to research success and failure of experiments in the representation of non-standard, precarious workers by trade unions, to learn more from these experiments, and to dedicate due attention to both the longer term impact of experiments themselves, and on the extent and way unions learn from experiments and manage (or not) to adapt and transform their own identities and strategies to more effectively target precarious work.
- A question that also deserves more attention is how to align the interests of standard and non-standard workers. Whereas it is increasingly clear that the fates of the two groups are interrelated, their priorities may be different at any given point in time. How unions can resolve this is a key research concern.
- The power resource framework is very relevant for further trade union research, however, it would be important to try and combine the traditional one, as used by Arnholz and Refslund, with the Lévesque and Murray one. Also, it would be interesting to further clarify the relationship between the power resource framework and the industrial relations and employment regimes discussed in chapter 4.
- It would be important to dedicate more effort to theorizing in a field dominated by empirical studies, and to bringing together existing theories, explanatory frameworks and concepts like union strategies or precarious work, to strengthen the field and contribution of industrial relations.
- It is important to give attention to organizing precarious workers, collective action and cooperation with other actors representing these workers. However, it is also

important to look at cooperation with employers and the state, and to influencing the state to e.g. achieve legislative changes.

- Concerning other actors representing NSWs, it is important to get a better view of their characteristics, power resources, under what conditions they emerge and what their relationship with traditional unions is. This is to a large extent discussed in chapter 7.
- Under-researched areas are employer strategies and motives; identities and subjectivities of (precarious) workers, their interests and needs, and their attitudes towards collective action and representation; the broadening of unions' representativeness claims and solidarity towards e.g. migrants and the respective coordination and cooperation with other organizations representing these workers, and the opportunities this offers for union renewal.

Alternative models of representation and voice

These gaps raise a series of new research questions that to several promising avenues to future research:

- How do different institution-led (non-union) initiatives and traditional grassroots initiatives among NSWs evolve over time? What are the mechanisms that contribute to the sustainability of these?
- What is the role of intersectional identities of NSWs beyond their employment situation for framing and developing and sustaining grassroots and institution-led (non-union) among NSWs?

What is the role of digital tools in shaping and enabling grassroots initiatives and institutional led initiatives? grassroots

- How does the national institutional setting and context such as industrial relations regimes, business models etc. influence grassroots and institution led initiatives and result in different trajectories and sustainability?
- Why has platform work unlike other forms of non-standard work attracted so much academic attention when it comes to researching bottom-up initiatives that are institution led or grassroots led?
- Why are we mainly seeing innovation and innovative forms of worker voice and representation in the platform economy and less so among other groups of NSWs?
- Are grassroots initiatives and other non-union institutional led initiatives more prominent in some industrial relations regimes, sector and business models than others?

