GDPoweR – Recovering workers' data to negotiate and monitor collective agreements in the platform economy

Research Design and Data Recovery Protocol

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Contents

Introduction

GDPoweR is a collaborative research project on industrial relations in the platform economy involving seven research and social partner organizations from five EU countries (Austria, Belgium, France, Poland, Spain). It centres on two location-based platform sectors, ride-hailing and food delivery, and explores three thematic areas. The first is the collection and use of worker data by digital labour platforms and the impact companies' collection and use of worker data has on worker well-being and their inclination to engage in collective actions. The second area of interest is strategies employed by social partners to negotiate and implement collective and company-level agreements in the platform economy. These agreements cover aspects like pay, working conditions, and the collection and use of worker data. The third and last area relates to the implementation, monitoring, and enforcement of such negotiated agreements.

The project's overarching aim is to strengthen industrial relations in the platform economy. To achieve this aim, GDPoweR pursues the following five objectives through the activities listed below:

Objective 1: Analyse the strategies of platform workers, activists, trade unionists and employer groups for negotiating workers' pay and working conditions, including the collection and use of personal data, and for monitoring and enforcing negotiated agreements by:

- Carrying out desk research actors' strategies and the state of industrial relations in the location-based platform economy in Austria, Belgium, France, Poland, and Spain.
- Conducting one focus group in each country with 5-8 industrial relations actors on their strategies for negotiating, monitoring, and enforcing agreements.

Objective 2: Advance and apply a novel method of data collection using data access and portability rights based on a citizen-science approach to audit the personal data collection and digital monitoring practices of platforms by:

- Developing a Data Recovery Protocol and data request templates to enable workers to recover their data from platforms through a GDPR-request, anonymise it and donate it to the project in a transparent process, compliant with privacy, ethics, and consent requirements.
- Recruiting at least ten workers who work with digital labour platforms active in each of the location-based services in food delivery and the ride hailing sectors in case countries (Austria, Belgium, France, Poland, and Spain) to donate their data to the project for subsequent analysis.
- Conducting one or two data recovery workshops, in each country case, informing platform workers how to recover their data from platforms.
- Conducting two sense-making national workshops for 8-12 platform workers in the food-delivery and ride-hailing industry to jointly with them make sense of their recovered data in each country case.
- Conducting two focus groups in each country with 8-12 platform workers in the food-delivery and ride-hailing industry to understand how the platforms' data collection practices affect them.

Objective 3: Assess the implementation of and/or challenges to collective bargaining agreements in the location-based platform economy by:

- Using recovered personal data to analyse whether platform companies comply with specific provisions of applicable collective agreements.
- Using desk research and focus groups´ input to understand the challenges social partners face when negotiating and/or enforcing collective agreements.

Objective 4: Strengthen industrial relations and social partnership in platform economy in Europe by:

- Raising awareness among platform workers, activists, and trade unionists about the data collection practices of digital labour platforms and empowering them to recover and analyse their personal data through the workshops and related events (see Objective 2).
- Comparatively analysing the negotiation and implementation of collective agreements in the platform economy and, thereby, informing on the process of social dialogue in other EU countries and beyond.
- Promoting exchange of knowledge and experiences on organising and implementing collective agreements between trade unionists and platform worker activists from EU Member States and Candidate Countries by organising a one-day transnational mutual learning event.

Objective 5: Inform policy making and research on industrial relations in the platform economy by disseminating the project findings and research methods by:

- Demonstrating the usefulness of GDPR-based Subject Data Requests for industrial relations research and enabling others to use the methods developed in the project by publishing the code, research design and data collection protocols online with open access creative common licence.
- Disseminating research findings through five country reports, one comparative report and two submitted academic articles.

To achieve its aims and objectives, GDPoweR combines research with activities to support worker empowerment, the exchange of knowledge between social partners and other stakeholders and dissemination activities to make the project results available to a wider audience.

This document was developed to support the implementation of the planned **research activities**. Unless specified otherwise, it describes the activities to be carried out by each national research team in their respective country case. The document is structured in two parts. The first part contains the Research Design (RD). The RD outlines the project's research questions and the different methods that will be used to answer them. The aim of the RD is to support researchers in the five countries covered by the project in conducting their research and to ensure the comparability of methods and results across countries. The second part contains the Data Recovery Protocol (DRP) listed under Objective 2. The DRP describes how project partners should work with platform workers in recovering, donating, and analysing their data in a GDPR-compliant manner and in accordance with the highest data protection standards.

The Research Design and Data Recovery Protocol were written by researchers at the European Centre for Social Welfare Policy and Research (European Centre) with support from other project partners. The documents were discussed and agreed upon by the project partners at the GDPoweR Methods Meeting in Vienna on January 23-24, 2024 – and finalised thereafter. Two addendums to the Research Design were added after a review by Ethics Committee of KU Leuven. Addendum I contains templates for subject access requests, information letters and consent forms and Addendum II contains a Data Management Plan.

Part I: Research Design

In line with project objectives, eight research questions were formulated. Table 1 below provides a tabular overview of all research questions, the objectives they serve, the methods to be used to answer them, and the project deliverables to which they will contribute.

Table 1: Overview of GDPoweR objectives, research questions, methodologies, and written deliverables

Obj.	Research Question	Method(s)	Deliverables
1	1.1 What strategies are used by activists, trade unions and employer groups for negotiating platform workers' pay and working conditions, including the collection and use of personal data? 1.2 What strategies are used by activists, trade unions and employer groups for implementing negotiated agreements in the platform economy?	- Desk research - Two Focus Groups (per country): one with activists and representatives of trade unions and one with representatives of platforms and employer groups	Five country reports & two article manuscripts*
2	2.1 What data is being collected by digital labour platforms on workers?	- 1-2 Data Recovery Workshops with workers per country - Analysis of worker data recovered from the platforms - Two Sense-Making Workshops with workers per country - (Optional) triangulation of recovered worker data with data collected through alternative means	
	2.2 Are workers aware of what data is collected on them? 2.3 How do platforms' data collection practices influence workers?	- Two Focus Groups with workers in each country (one per sector)	
3	3.1 Are collective agreements in the location-based platform economy implemented correctly?	- Desk research - Analysis of recovered and donated worker data with respect to the agreements - Comparison of recovered data with data collected through alternative apps - One Focus Group with activists and representatives of trade unions and employer groups	

		- Two Focus Groups with platform workers	
	3.2 What are the challenges faced by social partners in negotiating and/or enforcing collective agreements in each country?	- Desk research - One Focus Group with activists and representatives of trade unions and employer groups	
4	4.1 How does the negotiation and implementation of collective agreements in the location/based platform economy differ across the five countries and how can these differences be explained?	- Comparative analysis of the results of the five country cases as presented in the country reports.	One comparative report & two article manuscripts*

* The academic manuscripts can draw on data collected at any part of the project. The topics of the manuscripts will be decided at the research meeting (project month 15-16).

The planned research is divided into two levels. The first is the level of collective action and industrial relations (objectives 1 and 3) and it relates to research questions 1.1, 1.2. and 3.2. Research activities at this level explore activists', trade unions', platforms', and employer groups' strategies for negotiating and implementing collective agreements and their challenges in this regard. The second level of analysis is the level of individual workers. Here, GDPoweR will explore what data is collected on workers by digital labour platforms, how far workers are aware of companies' data collection practices and how the documented use of their data affects them to answer research questions 2.1, 2.2 and 2.3. Lastly, research question 3.1 regarding the correct implementation of collective agreements will be answered using evidence collected at both levels, namely worker data and information on workers' experiences collected at the individual level as well as evidence collected through desk research and a focus group with social partners at the level of collective action and industrial relations.

In the following, we first describe the methodology to be applied at the industrial relations level and then outline the envisioned research design for the individual level data collection analysis. Lastly, we describe the analysis of the implementation of collective agreements spanning both levels. For each method, we explain the aim and scope of the planned research, the methods to be used and offer practical support to project researchers. Thereby, the RD will ensure the use of the same methods and the production of comparable results across the five country case studies – Austria, Belgium, France, Poland, and Spain. All partners of the project, as country experts, will implement the research design at both levels in their own respective cases.

The research results from each country case will be presented as a written output in the form of single country case reports as well as a comparative report, aiming to provide an analysis of the variation, common practices, and emerging patterns of the platform economy and collective action in Europe. Culminating from the full scope of the research activities in the project, two academic article manuscripts will be produced with the joint collaborations of the project teams.

Section I – Research at the level of collective action and industrial relations

The research at the level of collective action and industrial relations comprises activities carried out by the national research teams as well as joint activities of the researchers with representatives of social partners, activists as well as other actors, where appropriate, like representatives of employer groups or public officials. The activities are graphically outlined in Figure 1 below. Researchers must recruit participants for one focus group with labour interest groups (activists and trade union officials) and one with the business side (employer groups, platforms). The focus group with activists and trade unions will be organised first, before the Data Recovery Workshops with workers (see section 2.2.1.). Where possible, activists and trade unions will be asked to help support and promote the latter. The focus group with employer groups will occur after the Data Recovery Workshops.

In parallel to the focus groups, the country teams will conduct desk research and a mapping of negotiated agreements. Both activities will benefit from each other and should be seen as complementary as symbolised in Figure 1 by the arrows between them: The desk research will be used to develop an understanding of the state of industrial relations and collective agreements in the relevant sectors of the platform economy and help formulate the most relevant questions for the focus groups. Information provided by the focus group participants, in turn will, help develop a deeper understanding of what agreements exist, how they were developed and are being implemented, etc.

Results from both the focus groups and the desk research will feed into the analysis of the implementation of negotiated agreements (Chapter 2.2.6.) discussed in the section on research conducted at the level of individual workers and worker data.

Figure 1: Research at the level of collective action and industrial relations
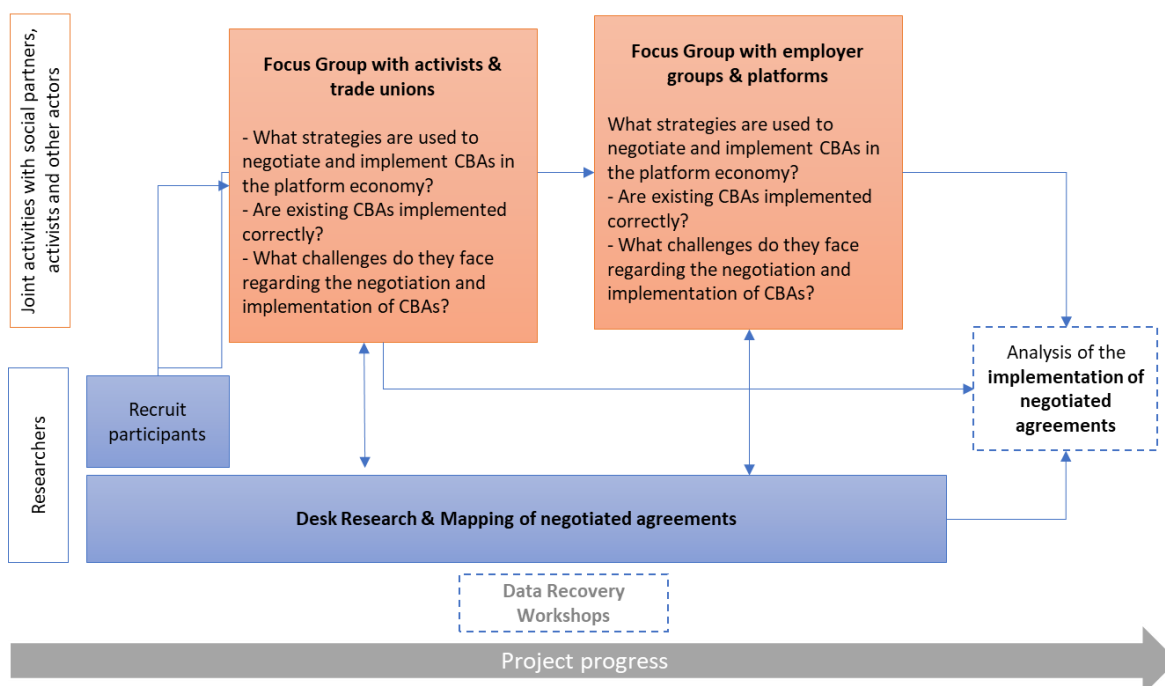
Desk research & Mapping of negotiated agreements

Implementation period: Project month 4 (January 2024) - month 11 (August 2024)

Aim and scope

The aim of the desk research and mapping is to describe the platform-mediated ride-hailing and food-delivery economy in each country, contextualise the project research by outlining each country's industrial relations system, and map the current state of industrial relations and negotiation agreements in the two industries. Furthermore, the desk research will collect any publicly available information on activists' and social partners' strategies to negotiate and implement collective agreements in the two sectors as well as any evidence on the state of the implementation of those agreements.

The desk research should provide an overview of the platform-mediated food-delivery and ride-hailing industry in each country., It should cover the number, names, and profile of relevant online labour platforms. Where available, the number of platform workers in each industry, their employment statuses, and key demographics such as age, gender, education, or citizenship should also be included. Potential limitations of the data must be reported. Where appropriate or necessary to establish a comprehensive understanding of the two sectors, the desk research should also cover the conventional, that is *not-platform mediated*, ride-hailing and food-delivery sector.

Second, desk research will collect relevant information on each country's industrial relations system and the state of industrial relations in the platform economy. The research will cover the legal and institutional context within which industrial relations in each country take place and identify the key actors. The research should cover, at a minimum, under which conditions workers can engage in collective bargaining at large and, more specifically, to what extent platform workers in food-delivery and ride-hailing can negotiate and are covered by collective bargaining agreements at the company and industry level. It should be discussed whether workers other than regular employees (self-employed, freelancers) are covered by (any) collective agreements.

The research partners should name and describe the relevant interest representation organisations like trade unions, employer groups as well as other civil society and activist organisations. Furthermore, the country research teams will collect information on strategies used by workers, activists, trade unions, employer groups and digital labour platforms to negotiate and implement agreements as well as the challenges they face in this process – with particular attention on debates and discussions on the topic of algorithmic management, digital monitoring, and data collection, and pay and working conditions. If such information or research is available, each partner should also provide a review of past studies that have focused on the data collection and monitoring strategies of platforms in their respective countries.

With respect to collective agreements, the desk research exercise will be used to map all existing negotiated, or currently being negotiated, agreements at the company and industry level in the two industries covered by the project – platform mediated food-delivery and ride-hailing. The mapping will cover all provisions within these agreements like rules on pay, working hours and working conditions. Particular attention will be paid to agreements, or parts of agreements, regulating what data digital labour platforms can collect about workers and how they can use it. In sectors where no current agreements exist, the research should also cover past agreements as well as unsuccessful negotiations i.e., negotiations which did not result in the conclusion of an agreement. The mapping will form the basis of project's analysis of the assessment of the implementation of those agreements (see chapter II, F).

Finally, the desk research will cover any publicly available information on whether the mapped agreements are being implemented correctly and what, if any, challenges activists and social partners see with respect to the correct implementation of those agreements. Overall, the desk research and mapping will contribute to answering the following research questions:

- RQ 1.1 - W*hat strategies are used by activists, trade unions and employer groups for negotiating platform workers' pay and working conditions, including the collection and use of personal data?*

- RQ 1.2 - *What strategies are used by activists, trade unions and employer groups for implementing negotiated agreements in the platform economy?*

- RQ 3.1 - *Are collective agreements in the location-based platform economy implemented correctly?*

- RQ 3.2 - *What are the challenges faced by social partners in negotiating and/or enforcing collective agreements in each country?*

Possible sources for the desk research

Data to be collected include public statements (e.g., in newspapers, television or on social media) by the different actors as well as position papers and strategies. If there are institutionalised implementation procedures like the joint 'algorithm committee' in Spain[1], those institutions and any statements or publications by them should be included as well. Another source of information on actors' strategies can be legal proceedings such as a trade union suing for platform workers to be covered by a collective agreement or a company suing workers striking to force the company to engage in collective negotiations.

In addition, the desk research should consider both academic literature as well as grey literature. Many of the sources for the desk research will be country specific. However, there are also some comparative reports and sources covering multiple countries. For example, the second ETUI Internet and Platform Work Survey (IPWS)[2] provides an estimate of the number of people engaged in platform work in Spring 2021 in European Countries including Austria, France, Poland, and Spain. With respect to (challenges regarding) the negotiation and implementation of collective agreements, the following resources may be useful:

- Regarding negotiated agreements regulating the collection and use of worker data, Algorithm Watch published a report[3] in 2023 based on research conducted on behalf of the International Trade Union Confederation (ITUC).

- The European Trade Union Institute (ETUI) also published a very fitting 2023 report titled 'Collective bargaining in the platform economy: a mapping exercise of existing initiatives' (Lamannis, 2023)

- The Leeds Index of Platform Labour Unrest[4] is a database for protests by workers against digital labour platforms between 2019 and 2023. The website also provides some analysis and

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[1] https://www.socialeurope.eu/first-agreement-for-platform-workers-in-spain

[2] https://www.etui.org/publications/platform-economy-europe

[3] Algorithm Watch (2023). Algorithmic transparency and accountability in the world of work. A mapping study into the activities of trade unions

[4] https://business.leeds.ac.uk/research-ceric/dir-record/research-projects/1721/leeds-index-of-platform-labour-protest

commentary of the data, including a recent article on 'How, Where and Why do Platform Workers Protest' (Umney, et al., 2024).

- The Gig Economy Newsletter[5] by Ben Wray provides regular updates on location-based platform work, platform workers' rights and collective bargaining in European countries. There is also an archive of former newsletters going back to July 2021.

- The FairWork project organised by the Oxford Internet Institute publishes reports assessing platform work in a wide range of countries based on five principles including worker representation.[6]

- Already in 2019, ETUC published a document on 'New Trade Union Strategies for New Forms of Employment'.[7]

- The EaSI-funded INCODING[8] project which ends in February 2024 covers collective bargaining strategies for regulating algorithmic management. The project covers Denmark, Germany, Hungary, and Spain.

Focus groups with activists & trade unions and employer groups & platforms

Implementation periods

- **Focus group with activists & trade unions:** Project month 6 (March 2024) – project month 9 (June 2024)
- **Focus group with employer groups & platforms:** Project month 9 (June 2024) – project month 12 (September 2024)

Aim and scope

We will organise in each country two focus groups with individuals responsible for negotiating collective agreements for platform workers in food delivery and ride-hailing at the company and sectoral level. One focus group will be conducted with labour representatives – trade union officials, activists, works council members – and the other with business representatives – representatives of employer groups, platforms. Each group should have **5-8 participants** and should cover both the food-delivery and the ride-hailing industry. The composition of the focus group depends on the national context of each case study. For example, in countries without organised employer groups, it may be appropriate to invite representatives of the digital labour platforms. In countries where the state plays an important role in collective bargaining, it can be appropriate to invite representatives of the relevant ministries.

The duration of the focus group should be approximately 2-3 hours. At least two project members – one moderator and at least one observer/note taker – are required to conduct a focus group. The focus group with activists and trade unions should be organised as early as possible because activists and trade unions may be able to help with recruitment for the Data Recovery Workshops

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[5] https://braveneweurope.com/gig-economy-project

[6] https://fair.work/en/fw/fairwork-reports/

[7] https://www.etuc.org/sites/default/files/publication/file/2019-04/2019_new%20trade%20union%20strategies%20for%20new%20forms%20of%20employment_0.pdf

[8] https://incoding-project.eu/

(see below). The focus group with employer groups and platforms will take place after the Data Recovery Workshops.

The research teams should ensure that representation within the focus groups is not skewed to one type of social partner, organisation or industry. Rather, the focus groups should be able to bring forward the expressions of the heterogenous stakeholders in the platform economy.

Complementing the insights gained by the desk research, the primary aim of the focus groups with activists, social partners and platform companies is to collect data to help answer the following research questions and bringing primary data on the specific areas of interest for the project:

- RQ 1.1 - *What strategies are used by activists, trade unions and employer groups for negotiating platform workers' pay and working conditions, including the collection and use of personal data?*

- RQ 1.2 - *What strategies are used by activists, trade unions and employer groups for implementing negotiated agreements in the platform economy?*

- RQ 3.1 - *Are collective agreements in the location-based platform economy implemented correctly?*

- RQ 3.2 - *What are the challenges faced by social partners in negotiating and/or enforcing collective agreements in each country?*

Methodology and guidance

A focus group is a small group of people led through an open discussion by a skilled moderator with sufficient knowledge and expertise on the topic of examination. The moderator structures the debate around a set of predetermined questions and encourages participants to share knowledge, opinions, ideas with each other. An important advantage of the focus group methodology is that, like in-depth interviews, it allows an opportunity to gain in-depth insights about the participants´ opinions, experiences, and perceptions of the phenomena that is being analysed. It is, therefore, more cost and time effective than in-depth interviews by bringing multiple informants through which in-depth narratives and data can be gathered. Moreover, focus groups allow synergy and group dynamics. In the case of GDPoweR, conducting focus groups with social partners allows the research to uncover aspect of collective action in the platform economy specific to the project research questions, whereby the nature of the method through sharing of experiences and perceptions in a group setting generates different viewpoints, ideas, and suggestions that the respondents themselves have not formulated or have yet considered before.

The focus group research design to be applied in the project is illustrated below in Figure 2 with the key tasks that need to be completed in three phases: **planning**, **facilitation**, and **analysis**. In the sections below, we further detail the different aspects of the implementation of this methodology in the GDPoweR project and which outputs and preparations need to be produced in these phases to apply a comparable implementation of the focus group methodology across the project.

Figure 2: Different phases of the focus groups
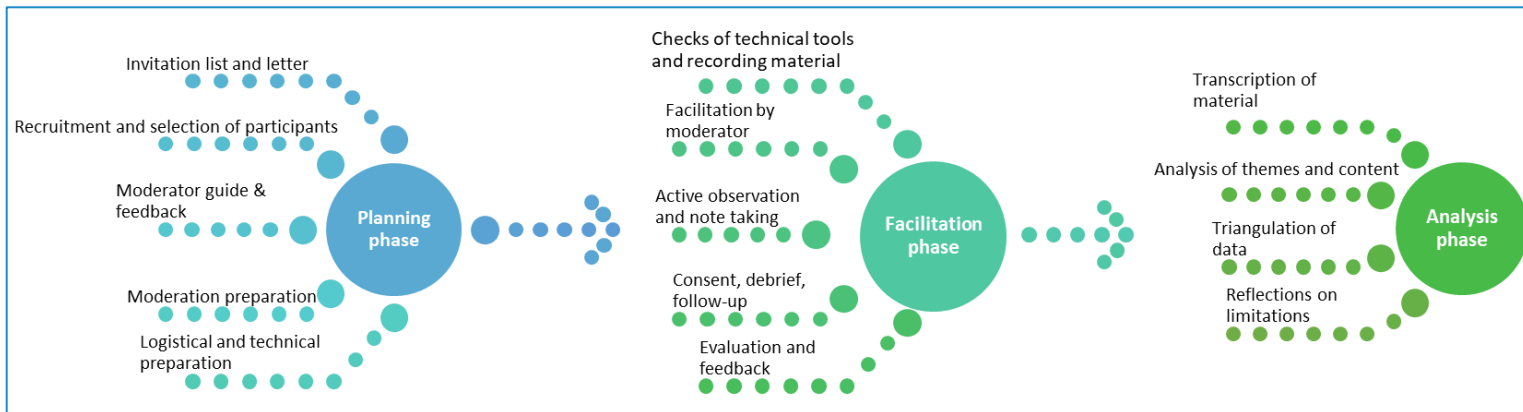
Source: Authors' own elaboration.

In the **planning phase** of the focus groups, the partners should start preparing their long list of participants and organisations that can be invited to participate in the focus group. This invitation long list should be as exhaustive as possible to cover all relevant industrial relations actors, underpinning primarily by the desk research conducted by the teams. The teams will then invite a selected number of participants to the focus groups based on the country specific considerations of the two sectors, as mentioned above.

One of the most important preparations during the planning phase is the write-up of the **moderation guide**. GDPoweR is a transnational research project, therefore, the focus group discussion topics should be comparable, valid, reliable, and follow the same structure for the data collected to be used in a comparative manner in the analyses. As listed above, the primary goal of the focus group data collection is to address the research questions 1.1, 1.2, 3.1., and 3.2 of the project. In this respect, the focus group discussion should be divided into different "content phases", each tackling a specific topic.

The topics that need to be covered, at a minimum, **in the first content phase of the focus group** should open the discussion by asking the participants about their experiences, strategies that they have used or have seen being used by social partners with respect to collective bargaining in platform economy and, more specifically, in achieving a collective agreements in the platform economy and/or taking action for the representation of the interests for the groups (workers, platforms) that they are representing. **In the second content phase,** the moderator should steer the discussion on actions that are being taken especially related to workers´ pay and working conditions and the collection and use of personal data – including automated decision-making ('algorithmic management'). Here, the focus group discussions should go into the more detailed aspects of collective bargaining with respect to platforms and their practices and the application of agreements (if existing). The focus group moderator should also raise sub-questions related to the challenges in ensuring enforcement of agreements and strategies by social partners when enforcement is unfulfilled. In both content phases, the moderators

Following the topics defined for the first and second phases of the focus groups with industrial relations actors, research teams will develop their own further detailed plan of the discussion guiding material with the main and sub-questions outlined in the **moderation guide.** The moderation guides should outline the (a) introductory remarks and opening of the focus group, (b) introductory question to the focus group phase where the topic is outline to the participants, (c) the key content questions

and sub questions, following the content phase specific issues that need to be addressed, (d) the transition question/remarks planned to move to the next phase of the focus group, and (e) concluding questions and remarks for each focus group content stage as well as in ending the focus group session. For each content phase, especially if a single focus group is being held in the country, the moderation guide should consider probes and steering strategies to ensure that insights from both sectors and all types of participants representative of different groups are included in the data collection. Probes can include examples of collective agreements or social partners' activities and strategies in other EU countries drawn from the desk research.

In the planning phase of the focus groups for each country case, the research design coordinator team (European Centre) will provide an example of their moderation guide and share with the partner teams to be adapted and used in their implementation.

The **facilitation phase** of the focus group refers to the day in which participants, moderator, and the focus group observants meet face-to-face. Focus groups usually last for 2-3 hours but the exact duration will depend on the number of topics to be discussed the willingness of participants to engage in the conversation. The discussion in the GDPoweR focus group with social partners will be structured but free flowing to be able to have the opportunity for participants to bring forward experiences and observations from the field and practice. Nevertheless, the focus group will follow a pre-determined structure mediated by the moderation guide and this design that should be systematically applied across each country case to meet the research goals of the project.

Before and on the day of the focus group, research partners will confirm the participants and double check the logistics of the location where the focus group will be held. The focus groups with social partners will be recorded. Prior to the focus group day, the moderator should be familiar with the topic and be comfortable with implementing the moderation guide. Focus group participants must provide their consent to participate in the group and to the use of the focus group results in our research and publications (see below). The moderation guide should provide the sufficient information in the introduction of the focus group to confirm informed consent by all the participants.

The questions from the moderation guide should not be read but asked in a conversational manner. However, the moderator should bear in mind to follow and stay within the planned guidelines given to her/him. The moderator must be able to listen and think simultaneously. S/he must follow the discussion closely, always know what the next topic of discussion is and should continuously evaluate whether the collected data are sufficient to provide an in-depth insight into the explored topic.

In addition to the moderator, one or two observers of the focus group (preferably someone from the research team) should be present in the focus group for taking notes, observing interactions and non-verbal communication. The observer can also assist the moderator wherever needed but will not interfere with the discussion.

Analysis of focus group data

The final phase of the implementation of the focus groups is the **analysis phase**. To facilitate the analysis, all researchers (moderator and observants) participating in the focus group should write a short summary of the main results right after the event and organise/type their notes from the focus group. For further data analysis preparation, the recording of the focus group should be transcribed.

The first level of the analysis should concentrate on using the research questions as basis for generating the main themes of analysis in the text. The researchers should extract the relevant parts of the transcript and/or notes from the focus group in a structured way, explicitly demonstrating how they address one or more of the questions. After such categorisation of the data in a way that

facilitates the answering of research questions, the partners should identify aspects that were reported by the respondents which require triangulation of the data. For this, the results of the desk research or some of the subsequent forms of data collection in the project can be used.

When analysing the data collected from the focus groups, the researchers should consider the limitations of this method such as social desirability, moderator bias, sampling bias, and any other factors that should be taken into account.

Evaluation

After the conclusion of the focus group as planned in the moderation guide, the moderator will distribute an anonymous **evaluation survey** to get the feedback of the participants (see GDPoweR Monitoring & Evaluation Plan).

Consent

Focus group participants must provide their consent to participate in the group and to the use of the focus group results in our research and publications, for which a detailed explanation will be included in the moderation guide to be declared to the participants in the beginning of the focus group.

Section II – Research at the level of individual workers and worker data

Research at the level of individual workers and worker data serves to help answer the following research questions:

- RQ 2.1 - *What data is being collected by digital labour platforms on workers?*

- RQ 2.2 - *Are workers aware of what data is collect on them?*

- RQ 2.3 - *How do platforms' data collection practices influence workers?*

- RQ 3.1 - *Are collective agreements in the location-based platform economy implemented correctly?*

The GDPoweR research strategy at this level builds on the #digipower investigation method conducted by Hestia.ai and others (Bowyer, Pidoux, Gursky, & Dehaye, 2022) and, more generally, on the cooperation with workers exercising their data access rights under the EU General Data Protection Regulation (GDPR) to recover their personal data and donate it to the project for joint sense-making and research purposes. While the use of GDPR data access rights for research purposes is still a relatively novel method, it has already been successfully applied in several studies (Ausloos & Veale, 2020; Habu & Henderson, 2023; Li & Toh, 2022). Following the example of the #digipower investigation, the application of this method includes a sequential series of workshops and focus groups as outlined in Figure 3 below.

The first step of the application of this strategy by project partners is to recruit platform workers in the food delivery and ride hailing industries to participate in the **Data Recovery Workshops** (A) in each country. The Data Recovery Workshops are organised to demonstrate to platform workers how to recover their personal data from digital labour platforms via subject access requests. Workers will also be encouraged to donate their recovered data to project researchers and asked to participate in follow-up events, namely two Sense-Making Workshops and a Focus Groups, with one pair of events for food delivery workers and one for platform workers in the ride-hailing industry. Lastly, the Data Recovery Workshops will be used to look for workers willing to participate in activities to **collect additional data by alternative means** (B) like the workout app Strava and a technical audit of the platform's own app on the worker's cell phone. Workers can submit Subject Access Requests (SARs) during the event or thereafter. Project researchers should be available to support them and help with any problems they encounter in the process. A share of workers who submitted requests is expected to donate their data to the researchers in their country for further analysis.

After the Data Recovery Workshop and once the data donated by the workers have been collected, the country teams will conduct a **first analysis and visualisation** (C) of the collected worker data. Specifically, they will clean and explore the data recovered by workers and collected through technical audits to understand what it contains and visualise key elements to make it more comprehensible. Thereby, the country teams will be supported by code to clean, standardise and visualise recovered data developed by the project lead in cooperation with the country teams.

The prepared and visualised data will be discussed with the workers who donated it at two **Sense-Making Workshops** (D). The aim of these events is to conduct a data 'deep dive' (Bowyer, Pidoux, Gursky, & Dehaye, 2022) with the workers allowing them to understand and explore the quality and breath of the data collected about them. In addition, the joint sense-making exercise serves to help researchers and workers understand the data, identify data and variables that can be used to assess the implementation of negotiated agreements and to identify data 'nuggets' which are worthy of further analysis.

Figure 3: Research at the level of individual workers

Workers

Submit subject access requests → Donate recovered data

Joint activities

A **Data Recovery Workshop(s)**
- train workers how to recover their data through subject access requests
- recruit participants for follow-up events

B Collect movement data through alternative apps

Technical audit of workers' platform apps

D **Sense-Making Workshops**
- data 'deep dive' and joint sense-making of workers' data
- identify variables for the analysis of the implementation of negotiated agreements and 'nuggets' worthy of further analysis

E **Focus Groups with workers**
Discuss workers' views on the documented use of their data, regulations and the role of trade unions and negotiated agreements.

Researchers

Recruit participants

Data analysis

C First analysis and visualisation of recovered/collected worker data.

Explore 'nuggets' and identify remaining variables

F Analysis of the **implementation of negotiated agreements** based on selected worker data and focus group results

Code to clean, standardise and visualise recovered data

Project progress

After the Sense-Making Workshops, each country research team will further explore the collected data focussing on the identified 'nuggets' as well as on data which could not be clearly identified during the joint sense-making exercise. If the first analysis of the collected data can already answer most questions and it can be anticipated that there is no need for further data analysis between the Sense-Making Workshops and the Focus Groups with workers, the country teams can consider organising both events on the same day.

The last joint exercises are two **Focus Groups** (E) with the workers who participated in the Sense-Making Workshops. The groups are again split by industry – food delivery and ride-hailing – and will be used the discuss workers' how workers feel about the data that is collected about them and what role they see for trade unions and negotiated agreements.

In countries where negotiated agreements at company or sectoral level on the collection and use of platform workers' data exists, the research teams will use the collected data and the inputs from the Focus Group with workers to assess the state of implementation of those agreements. In the following, each method and event are described in more detail.

Data recovery workshops (A)

Implementation period: Project month 6 (March 2024) - month 8 (May 2024)

As outlined in Figure above, the Data Recovery Workshop(s) are the first in a series of three events[9] to work with platform workers to recover their data from digital labour platforms, jointly make sense of the data and, after having analysed the data in more detail, discuss with the workers how the view platforms' collection and use of their personal data and what role they see for trade unions and social dialogue to regulate it.

Aim and scope

The aim of the Data Recovery Workshops is to empower platform workers in the two industries covered by the GDPoweR – food-delivery and ride-hailing – to recover their data from digital labour platforms through subject access requests and to inform them about the opportunity to participate in the GDPoweR project, namely by donating their recovered data to the project and jointly analysing it with researchers in the Sense-Making Workshop and the Focus Group. In addition, the Data Recovery Workshops will also be used to look for workers willing to participate additional research activities: the collection of movement data through alternative apps like the workout app Strava and a technical audit of the platform's own app on the worker's cell phone.

In each country, 1-2 Data Recovers Workshops should be organised. While it is possible to target workers in both industries with one event, it may be more feasible to organise two separate workshops for food delivery riders and drivers in the ride-hailing industry. We aim for data donations from at least **10 workers per country and industry** and data from at least **one worker per platform**. If a platform uses different employment models – for example employees and self-employed – we aim to have a data donation from at least one person for each employment model. Since only a share of all participants in the Data Recovery Workshops can be expected to be willing to donate their data to the project, our goal is to have at least 30 workers from each industry (at least 60 in total per

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[9] We thank Jessica Pidoux of PersonalData.IO for proposing the three-event-structure based on her experience from the Digipower Investigation. See (Bowyer, Pidoux, Gursky, & Dehaye, 2022) for details.

country) participating in the event(s). The Data Recovery Workshops are planned as physical events and there is budget for rooms for two events in each country.

Preparation

Finding sufficient platform workers interested and willing to participate in the workshops is expected to be challenging. Hence, sufficient time should be planned for the recruitment process. Trade unions and workers' collectives can be a valuable partner in reaching out to workers. Thus, to maximise outreach and encourage platform workers' participation in recovering and donating their data, the national research teams will work in close cooperation with trade unions (*ÖGB, FO, CGT, Solidarnosc, OPZZ*), worker activist groups and collectives (*CoopCycle, Riders Collective, Collectif des coursier-e-s / KoeriersCollectief*) and/or trade union affiliated research organisations (*Fundación 1 de Mayo, ACV Innovatief*).

To increase the visibility of the event, it could be combined with other (social) activities organised by the project partners or other (associated) partners. For example, the RidersCollective in Vienna organises monthly social events called 'Spill It' for food delivery riders at a room rented by the collective. Organising a drop-in Data Recovery Session at such event will likely increase participation. Other ideas for increasing participation include offering food and coffee, advertising the event on social media (Facebook, Instagram) and targeting workers who may intrinsically be motivated to participate in research projects (e.g. social sciences students).

Lastly, some platform workers may be afraid that submitting SARs may lead to retaliation from the digital labour platform they work for, for example in form of fewer orders or even a deactivation of their account. One way to minimise the risk for workers is to work with individuals who, for some reason or another, have less to lose. One example are workers who have recently quit or are planning to quit the job soon. For such individuals, a deactivation of their accounts is of low consequence. Another group are individuals who enjoy some form of job protection. This can be regularly employed riders or drivers who enjoy some form of employment protection by the applicable employment laws in their country. In Austria, another example are members of works council, who enjoy strong dismissal protections.

In preparation for the event, researchers should explore how Subject Access Requests can be submitted to the digital labour platforms targeted within that country. Some companies require applications to be sent via email to a data protection officer, others require the use of an automated data download portal (Bowyer, Pidoux, Gursky, & Dehaye, 2022). Templates for Subject Access Requests and Data Donation Contracts (see Addendum I) should be prepared so that participants can make their requests during the event and have sufficient information to exercise the request on their own later.

Guidance for the event

At the event, workers should be informed about their rights under the European General Data Protection Regulation (GDPR) to receive a copy of their personal data store by companies from those companies upon request. Specifically, according to Art. 15 (1) GDPR on the Right of access by the data subject, individuals (data subjects) have the right to *"to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data"*. Furthermore, Art. 15 (3) states that "*[t]he controller [of the data] shall provide a copy of the personal data undergoing processing.* […] *Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.*"

Workers should be provided with Subject Access Request (SAR) templates to recover their data from the company they work for and with information on how to submit those requests. Template SARs for several platforms are included in Addendum I to this document. There should be an opportunity for workers to fill out the SARs and submit the requests at the event. All participants should also be informed about the opportunity to donate their recovered data to the project and the conditions under which they can do so. To this end, we can give interested participants a copy of the Data Donation Contract (see Addendum I) and further explain how they can donate their data, how it will be used and for how long (see also Data Recovery Protocol).

It is up to each country research team to decide on how to implement the Data Recovery Workshops in accordance with the availability of facilities, specificities of the individuals targeted and other local contexts. However, considering the high number of targeted workers and the need of one-to-one conversations between workers and researchers, one option is to organise the workshops as a 4–5-hour drop-in session at a conveniently located destination. This option would require 2-3 researchers to be present with laptops to provide one-on-one information and guidance to workers dropping in.

Informing workers about the opportunity to participate in further project activities

In addition, workers should be informed about the opportunity to participate in the further project activities, namely by participating in forms of data collection through alternative methods (alternative apps, technical audit of platform apps – see section below) and by participating in Sense-Making Workshops and the Focus Groups.

We plan to conduct Sense-Making Workshops and Focus Groups with 8-12 workers per country and industry. The participants should be the same in both events. Since the events will explore each persons' personal data, only workers who recovered their data from a digital labour platform or participated in other forms of data collection, and donated this data to the project can participate in these events. Participants in the Sense-Making Workshops and Focus Groups for workers can be paid a reimbursement for working time lost. It can be helpful to fix dates for the follow-up events before the Data Recovery Workshop so that interested workers can be informed when and where they will take place.

Follow-up support in the data recovery process

Under the GDPR, companies should respond to SARs within 30 days. However, experiences from earlier projects have shown that platforms sometimes ignore requests (Bowyer, Pidoux, Gursky, & Dehaye, 2022; Agosti, Bronowicka, Polidoro, & Priori, 2023).

Therefore, it is important to offer workers continued support during this process. One option is to nominate a contact person in each national research team to check-in with and answer questions of platform workers trying to recover and donate their data. Furthermore, articles 51 and 57 of the GDPR task independent supervisory authorities (Data Protection Authorities) in each EU country with monitoring and enforcing the application of the GDPR. If workers' requests are not answered, we can help them file a complaint with the Data Protection Authority.

Evaluation

After the conclusion of the data-recovery exercise, the event team will distribute the anonymous **evaluation survey** to get the feedback of the participants.

Implementation period

- **Collection of movement data:** project month 6 (March 2024) - month 8 (May 2024)
- **Technical audit:** project month 7 (April 2024) - month 10 (July 2024)

Aim and scope

There is chance that workers will not be able to recover their data from platform companies or that the data that is recovered is wrong or incomplete. To address this possibility, we aim to collect data by alternative means as well.

First, some workers are entitled under collective agreements to fees for distances travelled. However, the distances travelled are usually calculated by platform companies themselves. To assess whether movement data provided by platforms is correct, we will collect data on workers movements and deliveries through alternative apps like the Vehicle Trip LogBook Tracker or the self-tracking app WeClock. The collected movement data can then be compared with movement data recovered from platforms to assess if there are any discrepancies.

This method will be used in cases where a collective agreement grants workers pay for distances travelled. Movement data should be collected through alternative means for at **least one worker for each relevant platform**. In these cases, the collection of movement data through alternative means will help answer Research Question 3.1 – *Are collective agreements in the location-based platform economy implemented correctly?*

Second, country teams *can* (optional!) conduct **technical audits** of the apps platform workers must use for work. This method can help gain a better understanding of the data collected by platform companies and it can be used to assess if the companies collect more information than they are willing to provide in response to Subject Access Request. Thereby, this method helps answer *Research Question 2.1 – What data is being collected by digital labour platforms on workers?*

Both data collection methods require cooperation from platform workers and it can be difficult to find volunteers. However, we assume that companies' practices do not vary between their workers within one country[10] which means that a company's collection and use of one workers' data should be representative of all workers. Hence, it is sufficient to cooperate with one worker per platform on each method – the use of an alternative app and the technical audit of the platform's app. Both methods can also be implemented in cooperation with the same worker.

Collecting movement data through alternative means

This method requires a worker to install an additional app on his or her phone and have it active for several (5-10) working days during working hours to collect data on about 100 trips/deliveries which can then be compared with the data collected by the platform company. The details of the data collection process depend on what data is required to test the application of the relevant collective agreement. For example, if workers are entitled under the collective agreement to a payment for the distance travelled for each individual delivery, only the distances travelled while making deliveries should be recorded. After recording the trips, the participating worker must recover his or her data from the platform and the alternative app and donate both to the project researchers for analysis.

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[10] Data collection practices are likely to change significantly over time with updates to the company's technology.

Crucially, to be able to compare the data from both sources, the data recovery requests must be made *after* the simultaneous use of both apps.

Technical audit of platforms' apps

To better understand what data is collected and shared by platform apps, we will replicate a methodology for a technical audit of a platform workers app developed and implemented (Agosti, Bronowicka, Polidoro, & Priori, 2023). The technical audit can show which data the app accesses (e.g., position data) and when (e.g., outside working hours) as well as what data the app sends to and receives from servers. By implementing this method, Agosti et. al. discovered evidence of the app requesting position data outside working hours, as well as evidence indicating the sharing of data with third parties as well as of automated decision-making by the platform company.

The analysis relies on the freely available tool FRIDA, an instrumentation toolkit for developers, reverse engineers and security researchers as well as the use of a man-in-the-middle proxy.[11] The audit requires the use of a rooted android phone to be provided by the researchers, the platform app and the login details of one person working for that the platform in question. The audit lasts for about 48 hours and is conducted while the worker is *not* working. The method does *not* use the worker's own phone or personal information stored on his or her phone.

Consent

Individuals participating in either method of data collection must be informed about the method and provide their informed consent for participating and donating the resulting data.

First analysis and visualization of worker data (C)

Implementation period: project month 8 (May 2024) - month 11 (August 2024)

Aim and scope

The aim of the first analysis and visualisation of the worker data is to help researchers prepare for the joint analysis of the recovered data with workers, i.e. the data donors, during the Sense-Making Workshops.

The preparation includes for the researchers to familiarize themselves with the data and make as much sense of it as possible on their own. Based on earlier research, we expect most data to be provided in tabular format, for example CSV-files, and contain variables with information on for example the worker's name and address, salary, the beginning and end of shifts, the coordinates of pick-ups and delivery destinations.[12] It is quite possible that data is provided in several files containing several dozens to hundreds of variables. Not all variables will be relevant, and many will be self-explanatory. To use the time during the workshop as efficiently as possible, researchers from each country team should hypothesize the meaning of (seemingly) easily identifiable variables and present those hypotheses to workers for validation. Furthermore, researchers should explore the data to find potential 'nuggets' – pieces of data which are particularly relevant for the research, and which should be further explored during the Sense-Making Workshops and during subsequent analysis. This

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[11] https://frida.re/

[12] An example of recovered data from an UBER driver provided by the DigiPower Academy can be explored here https://digipower.academy/experience/uber

includes identifying variables which could be used to assess the implementation of collective agreements.

We assume that platform companies collect the same, or at least similar data, in all countries. Hence, if the same platform is covered by research teams in different countries, the latter can cooperate in the sense-making exercises.

In addition, researchers must prepare the data to make it as accessible and comprehensible for workers as possible. This can include cleaning or (re)structuring the data into tables as well as visualising (important parts) of the data. The goal here is to have workers' data prepared in such a way that workers are best able to make sense of the data that has been collected about them. The guiding principle should be to focus on aspects that are most relevant for workers. Possible areas to focus on include the **nature of the data collected** (e.g., the meaning of different variables such as location, start and end time of each shift, duration of breaks), the **scope of the collected data** (e.g., on how many different variables was data collected, when and for how long?) and **the frequency and level of detail** at which data is collected (e.g., how often was data about my location collected? How accurate is the location data? How precise does the company measure my working hours and breaks?).

In addition, it can be useful to distinguish the data along the lines of the following five categories (Bowyer, Pidoux, Gursky, & Dehaye, 2022):

- **Volunteered data**: information provided by the worker to the platform.

- **Observed data**: information observed by the platform like working hours or movement data.

- **Derived data**: information derived from other types of data. For example, performance index calculated on the share of orders accepted and the speed of delivery.

- **Acquired data**: information bought or otherwise acquired by the platform from third parties.

- **Meta data**: data about data. For example, information on which phone and operating system the platform worker is using.

Tools

The methods team at the European Centre will work with the research partners to develop a code to clean and, where possible, standardise and visualise important elements of the recovered data. To this end, project partners must share with the European Centre team samples of the recovered data as soon as possible after receiving it. The code will be completed and shared with partners by project month 10. In addition, the Digipower Academy offers an excellent free online tool for the visualisation of UBER driver data which country research teams should consider using.[13]

Sense-making workshops (D)

Implementation period: project month 11 (August 2024) – month 13 (October 2024)

Aim and scope

Two Sense-Making Workshops – one for platform workers in food delivery and one for platform workers in ride-hailing – will be organised with **8-12 workers** each who **donated their data** recovered

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[13] https://digipower.academy/experience/uber-driver

from platforms and/or collected data through alternative means. Participants will be reimbursed for working time lost. If a country team receives donations from more than 12 workers, they should aim to invite as diverse a group of participants as possible to reflect the existing heterogeneity among platform workers in terms of ethnic background and citizenship, working hours, dependency on their income from platform work, involvement in activism (e.g. trade union membership), knowledge about platforms' data collection practices, etc.

The workshops serve two related goals. The first aim is to jointly with the workers make sense of the data and, thereby, help answer the following research question:

- RQ 2.1 - What data is being collected by digital labour platforms on workers?

The exercise should help both, researchers, and workers, build on the initial analysis of the data (Section C) and gain a comprehensive understanding of what it contains and means. This includes conducting a 'data deep dive' (Bowyer, Pidoux, Gursky, & Dehaye, 2022) with workers – presenting them the raw data in an accessible format and jointly exploring and making sense of it.

While the first aim is comprehensive and unguided, the second is more deliberative. Namely, to identify variables and data necessary or interesting for further analysis. First and foremost, this means looking for data which can be used to assess the implementation of negotiated agreements. What type of data is necessary for this task depends on the applicable agreement(s) (if there are any). For example, if the applicable agreements state that certain data should not be collected of only stored for specific duration, we should explore if this data is indeed not collected or only collected in accordance with the rules laid down in the agreement.

In addition, the exercise should be used to identify data 'nuggets' (Bowyer, Pidoux, Gursky, & Dehaye, 2022) – data which appears to be valuable to be explored further. For example, this could include evidence of algorithmic management practices like 'performance' or 'excellency scores' attributed to workers (Agosti, Bronowicka, Polidoro, & Priori, 2023).

Sense-making exercise

In preparation for the workshop, the researcher(s) should develop a list of topics (open questions regarding data, 'nuggets' to be explored, etc.) based on the first analysis described in Section C above.

At the event, it is recommended to group participants by the platform they work for because the content and structure of their data will be highly similar. Each group should be supervised by one project researcher. The exercise should be clustered into two parts. In the first part, researchers should present their initial findings and visualisations and work with participants through the prepared list of questions. In this part, researchers can ask if there are volunteers who agreed to their data shown to and discussed by all participants as an example to show the nature, scope, frequency, and level of detail of the collected data. In case there are no volunteers, the researchers should prepare a presentation of the data and visualisations based on aggregated and/or anonymised data which does not allow for the identification of the data donor. Researchers should document the answers to their prepared questions as well as any new questions that developed during the exercise.

In the second part, participants should have the opportunity to further explore their own data. To this end, each participant should be provided with a computer/laptop containing his/her data and any visualisations thereof and provided with sufficient time to explore the data and ask questions to the researchers present.

Documentation and evaluation

After the conclusion of the sense-making exercise, the event team will distribute the anonymous **evaluation survey** to get the feedback of the participants.

Focus group with platform workers (E)

Implementation period: Project month 14 (November 2024) – month 16 (January 2025)

The Research Design foresees a break between the Data Recovery Workshops and the Focus Groups with workers to conduct further analysis and answer open questions. However, if the first analysis of the collected data can already answer most questions and it can be anticipated that there is no need for further data analysis between the Sense-Making Workshops and the Focus Groups with workers, the country teams can consider organising both events on the same day, especially if this makes it easier for workers to attend.

Aim and scope

We will organise two focus groups, each with the **same 8-12 workers** who participated in the Sense-Making Workshops in the each of the five countries covered by the project. One focus group will be with workers in the ride-hailing industry, the other for food-delivery workers.

The aim of these focus groups is to discuss with workers what they have learned about the data collected about them, how they feel about the use of their data and what role they see for trade unions and collective bargaining in regulating the collection and use of workers' personal data through digital labour platforms. In doing so, the focus groups with workers will help answer the following research questions:

- RQ 2.2 – Are workers aware of what data is collect on them?
- RQ 2.3 – How do platforms' data collection practices influence workers?
- RQ 3.1 – Are collective agreements in the location-based platform economy implemented correctly?

The estimated duration of each focus group will be two hours. Participants will be reimbursed for working time lost. For all other practical information on conducting focus groups and the planning, facilitation, and analysis phases of the methodology to be applied, please consult the section on the focus group with activists, trade unions and employer groups (Section 2.1.2.).

Guidance on questions

Each partner will prepare a moderation guide designated to the relevant focus group with workers – and specific to the platform activity sector. At the beginning of the focus group, partners should remind participants of the findings of the Data Recovery Workshop, possibly with the use of data visualizations. Furthermore, the beginning of the focus groups can be used to answer any questions left from the Data Recovery or to present new findings made since then. When preparing the moderation guide for the focus groups for the workers, please refer to our guidelines above in Section I. Specific to the focus groups with workers, following the research questions that we aim to answer with this method, three content phases should be designed for the moderation. Below, we provide an overview of how questions to the participants can be clustered into three sections of content based on the three research questions:

Are workers aware of what data is collect on them? (RQ 2.2)

- *What do you think the response you received to your Subject Access Request?*

- *Were you surprised by anything in the response?*

  o *For example, were you surprised that specific information like the duration of breaks is collected or that companies calculate 'performance scores' for each worker?*

  o *Why or why not?*

- *Do you think the data you received is all the data the platform collects about you? Why or why not?*

- *Do you feel the platform you work for is transparent regarding its collection and use of data about you?*

How do platforms' data collection practices influence workers? (RQ 2.3)

- *How do you feel about the data collected about you? Does it concern you or are you fine with it?*

- *Is there any specific information (type of data, use of data, frequency of data collection, etc.) about the collection and use of data by the platform you work for that concerns you?*

- *Do you feel monitored during working hours? Do you feel monitored outside your working hours?*

- *Having seen the data you recovered, do you feel you have a better understanding of how the app works and how decisions (e.g. about why you get or don't get orders) are made?*

- *Do you see any (other) benefits for yourself from having recovered and analysed your data?*

- *Are you concerned that platforms use the data collected through apps to find out who participated in strikes and/or demonstrations?*

- *Do you feel there is a need for greater transparency regarding what data platform companies are collecting and how they are using this data? In which areas would you like to see more transparency? Why?*

- *Do you feel there is a need for changes? Do you feel there is a need for stronger regulations?*

- [For countries and industries were no negotiated agreements on the collection and use of worker data exist]

  o *One way to regulate the use of data by companies is through agreements negotiated by workers (company level agreement) and trade unions (sectoral/collective agreement). Do you think such agreements can/should be used?*

  o *Do you think workers should take collective actions like strikes to force platform companies to change their collection and use of worker data?*

- *Do you think joining a trade union can help improve the protection of your data?*

Are collective agreements implemented correctly? (RQ 3.1)

The following questions are only relevant in countries and industries were negotiated agreements on the collection and use of worker data exist at the company or industry level.

- *Are you aware of the following negotiated agreements on the use of worker data? (If not, briefly describe them).*

- *Do you think the [name(s) of the applicable agreement(s)] are sufficient to protect workers and their data? Why or why not?*

- *Based on your experiences and what you learned, do you think the collection and use of your personal data is accordance with the [name of the applicable agreement].*

In addition to the listed questions, focus group participants should have the opportunity to raise questions of their own related to the collection and use of their personal data by digital labour platforms.

Consent

Focus group participants must provide their consent to participate in the group and to the use of the focus group results in our research and publications.

Evaluation

After the conclusion of the focus group as planned in the moderation guide, the moderator will distribute the anonymous **evaluation survey** to get participants' feedback.

Assessment of the implementation of collective agreements based on worker data (F)

Implementation period: Project month 9 (June 2024) to month 16 (January 2025)

Aim and scope

The methods described in this section use worker data recovered from platform or collected through alternative means to assess the implementation of negotiated agreements and, thus, answer the following research question:

- *RQ* 3.1 - Are collective agreements in the location-based platform economy implemented correctly?

Due to the focus on collective agreements, the described research can only be conducted for countries and industries where negotiated agreements at company or sectoral level exists. However, the same method can also be used to analyse if platform companies comply with statutory rules such as labour law (e.g. on maximum daily working hours) and privacy laws (e.g. on types to data that should not be collected).

For each collective agreement, the country team will develop concrete hypotheses to be tested. Thereby, the focus should be on stipulations in the collective agreement that can be tested using the available data recovered from platforms through SARs or collected through alternative means. Most importantly, this means analysing compliance with any rules that regulate what worker data platform companies are allowed to collect and store. In addition, the collected data will likely allow researchers to assess compliance with rules pertaining to the payment of kilometre fees, the payment surcharges (evening, weekend), compliance with mandatory breaks and maximum daily working hours.

Furthermore, results from the focus groups with activists, trade unions and employer groups as well as platform workers can be used to inform the focus of the analysis: if workers, activists or unions suspect non-compliance with a specific provision, it may be worthwhile for the national research team to explore whether compliance with that provision can be assessed with the available data.

Tools and methods

Compliance with rules regarding the collection of worker data can be assessed simply by analysing if a company collected any data it is not supposed to collect or if it stored data for longer than it was supposed to have it. Similarly, compliance with rules on working times or mandatory breaks can be assessed by analysing when and for how long workers worked.

Questions regarding payments such as the payment of weekend surcharges may be more difficult to assess if the recovered data does not include information on payments. In this case, workers should be asked if they are willing to provide this additional information (subject to their informed consent).

To estimate the correct payment of a kilometre fee, we will compare the amount paid with the estimated minimum distance travelled. We expect the data recovered from platforms will provide information on, at least, the overall amount of data collected by platforms, workers' periods of activity and the start and end point of each trip (delivery, drive). The travel distance by bike or car (depending on the industry) will be calculated in r using the "gmapsdistance" package in combination with Google Maps API.[14] The "gmapsdistance" tool calculates the travel distance of the recommended route which will be used as benchmark. The calculated travel distance will be used to calculate the minimum amount of kilometre fee platform workers should have received. The calculated amount will then be compared with the kilometre fee received by workers to test if they were paid correctly. If payment data is not included in the recovered data, researchers may ask the worker in question to provide this information. Where additional data on the distance covered is available from other sources (such as the STRAVA app), the correct payment per kilometre will be calculated using this data as well.

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[14] https://hwangnyc.medium.com/calculating-travel-time-and-distance-using-google-maps-api-in-r-bbc5b74df066

Part II: Data Recovery Protocol

The Data Recovery Protocol (DRP) provides step-by-step instructions how workers can recover and donate their data to GDPoweR researchers and how the donated data should be handled to ensure the privacy and confidentiality of the data donor. Each project partner who will receive data donations from workers will nominate a **Data Manager** in charge of ensuring compliance with the DRP.

Steps:

1. **Submission of SAR by worker**

An individual submits a SAR to the digital labour platform s/he works for. Sample SARs with submission instructions are provided below.

2. **Recovery of his/her personal data by the worker**

The individual receives his/her personal data in electronic format. According to the GDPR, companies must respond to requests within one month. However, some companies may take longer or refuse to respond (Bowyer, Pidoux, Gursky, & Dehaye, 2022).

3. **Signing of the data donation contract**

Workers interested in donating their data are provided with a

Data Donation Contract Data (see Addendum I) by project researchers and are informed about the research project, the purpose of the data donation and the terms and conditions under which they can donate their data.

The signed agreement must be stored safely (e.g. in a locked cabinet) accessible only to the Data Manager. Workers who sign the contract should be provided with a copy of the agreement.

4. Data donation to project researchers

Workers who signed the contract can donate their recovered data in the way most convenient to them (e.g. via email, filesharing, on a USB-stick). To minimise the risk of data breaches, it is recommended that workers first encrypt the file, for example by creating a password-protected WinRAR-archive. Instructions can be found here (https://toolbox.easeus.com/file-lock-tips/lock-rar-file.html).

5. Cataloguing the received data

Once the data is received, it should be catalogued. The place of storage should be document as well as any manipulation or sharing of the data. Finally, the data by which the data must be deleted in accordance with the data donation contract must be specified.

An example for how to catalogue the data is provided in the table below.

Data donor (pseudonym)	Country case	Platform name	Date received	Number of files	Personal identifiers deleted?	Place of storage	Data shared with (name, duration)	To be deleted by (date)
Leonard	AT	Foodora	21.12.2023	7	Yes	C:/GDPoweR/ password protected folder/	Elif Naz Kayran (31.12.2023 -)	September 2026

6. Save storage

All data received should be store only in password protected folders to which only researchers within the GDPoweR project how work with this data (need-to-know principle) have access. If the files are encrypted as well, the passwords for accessing the files should be stored separately.

Storing the data in various places should be avoided to make it easier to trace and later delete all files.

7. Removing personal identifiers

Once the data is received, the name of the data donor should be replaced by a number or pseudonym. The name of the donor and the pseudonym used instead of his/her name should be safely stored separate from the data. Researchers must be able to link the data to its donor to conduct the joint analysis of the data with workers during the Sense-Making Workshops and to be able to delete the data if the donor revokes his/her consent.

Other personal identifiers like address, date of birth or social insurance number should be removed from the data to reduce the risk that in the case of data breach the person the data belongs to can be identified.

8. Data sharing with other project researchers

To prevent data breaches, GDPoweR follows the 'bubble concept' (Bowyer, Pidoux, Gursky, & Dehaye, 2022). This means that NO data donated by workers will be shared with anybody outside the GDPoweR consortium and that, unless specified otherwise (see point 10), all donated data will be deleted after the end of the project.

Even within the consortium, worker data should only be shared to the extent that it is necessary to achieve the project goals and only the minimum amount of data necessary to achieve those goals should be shared. The sharing of any data must be documented (see point 5). Where possible, data should only be share through protected networks. If it is necessary to send data via email, the data must be encrypted (e.g. as a password protected WinRar file) and the sender and receiver must delete the emails afterwards to ensure no copies are inadvertently stored.

9. Ensuring that published results do not allow for the identification of the data owner

When publishing results from the analysis of worker data, utmost care should be taken to ensure that none of the results can be used to identify the donors. To this end, any results should be double-checked to ensure they contain no personally identifying information such as names, addresses, id numbers, date of birth, etc.

Sensitive data such as location data should only be published at a higher level of aggregation, i.e. when the data from several individuals is combined to ensure that no one person can be identified. Furthermore, the first and last drive of every day should not be displayed as these trips may start or end at the worker's personal address.

10. Rules on deleting the data

The rules for deleting data donated to project are laid down in the data donation contract. As default, all data received should be deleted within one year after the end of the project, i.e. by September 2026. However, donors can also select to make their data available to researchers beyond the duration of the project.

DATA DONATION CONTRACT

GDPoweR - Recovering workers' data to negotiate and monitor collective agreements in the platform economy

Funded by the European Commission, DG Employment, European Social Fund+, Social Prerogatives and Specific Competencies Lines (SocPL)

GDPoweR is a collaborative research project by [*Name of your organisation*] in cooperation with six other research and social partner organizations from five EU countries (Austria, Belgium, France, Poland, Spain) led by the European Centre for Social Welfare Policy and Research in Vienna. The project runs from October 2023 until September 2025. The project's overarching goal is to support the development of industrial relations in the platform economy, especially with respect to agreements to regulate the collection and use of worker data.

Focused on the ride-hailing and food delivery sectors, the project explores three key areas: the impact of digital labour platforms' data collection on worker well-being and collective action, strategies of social partners in negotiating and implementing collective agreements, and the challenges in enforcing these agreements.

To analyse the data collection practices and the implementation of the collective agreements, GDPoweR relies **on workers recovering their personal data** from platforms through Subject Access Requests based on your data rights laid down in the General Data Protection Regulation (GPDR) **and donating the recovered data to project researchers for analysis**.

Individuals who donate their data will be invited to a **Sense-Making Workshop** in which researchers will work with data donors to together understand and make sense of what the recovered data contains. In addition, data donors will be invited to a **Focus Group** to discuss with researchers how they feel about platforms' collection and use of worker data.

The research results will be published as reports and academic articles. All donated data will be used confidentially. The identity of the data donors will never be disclosed to anybody outside of the project.

By donating your data, you contribute to the success of the project. If you like to do so, please read and agree to the following terms and conditions:

1. Data Donation

- You agree to donate the data, collected about you by a digital labour platform which you recovered from said platform through a Subject Access Request based on your GDPR rights, to [*Name of your organisation*] and the GDPoweR consortium.

- The data is donated in an electronic format (for example as CSV-file).

2. Use of Donated Data

- The donated data will be used for research and analysis within the GDPoweR project, specifically to analyse what data is collected by digital labour platforms about platform workers and whether collective agreements are being implemented correctly.

- The results of the analysis will be published in form of reports and academic publications.

- If you want to make your data available to [*Name of your organisation*] also for research that goes beyond the *GDPoweR* project, you can do so at the bottom of this form.

3. Privacy protection and data pseudonymisation

- To protect your privacy, your data will be saved under a pseudonym. A key to reverse the pseudonymisation will be securely stored in a password-protected file only accessible by the responsible Data Manager at [*Name of your organisation*].

- Personal identifiers like your name, social security number or data of birth will be removed from the donated data.

- All project outputs using your donated data will be written in a way where information cannot be traced to individuals. No data or research results which could be used to identify you will be published.

4. Data Handling

- We are committed to treating your data with the utmost care and confidentiality. All donated data will be securely stored on password-protected servers accessible only by authorised personnel involved in the *GDPoweR* project.

5. Data Sharing

- Your pseudonymised data may be shared with other researchers in the *GDPoweR* consortium for analysis.

- Your donated data will not be shared with third parties without your explicit consent unless required by law and your data will not be used for any purposes other than research.

6. Data Retention

- Unless you agree to the use of your data beyond the *GDPoweR* project, all your donated data will be securely deleted within one year after the end of the project in September 2025.

- Results derived from the analysis of your data can be retained by [*Name of your organisation*] the other members of the *GDPoweR* consortium even after the end of the project.

7. Right to revoke your consent

- You have the right to revoke your consent at any time. Upon revoking your consent, your donated data will be deleted and not used in any further analysis.

- Research results based on your anonymised data derived *before* you revoked your consent may continue to be used by [*Name of your organisation*] and other members of the GDPoweR project even after you revoke your consent.

8. Contact person

- For questions regarding the GDPoweR project, this contract or if you want to revoke or change your consent, please contact [*Name, contact details*] at [*Name of your organisation*].

- You can also contact the Project Coordinator, Sonila Danaj (danaj@euro.centre.org) at the European Centre for Social Welfare Policy and Research.

9. Consent

- Please select the statements you consent to below. By signing the form, you confirm that you have read, understood, and agree to the terms outlined in this Data Donation Contract.

□ I confirm that the data I am donating belongs to me and that I did not share the work account from which the data was recovered with another person.

□ I have read, understood, and agree to the terms stated above, and I willingly donate my data to [*name and address of your organization*] and the *GDPoweR* research project.

□ I consent to [*name and address of your organization*] also using my donated data for research other than the research foreseen in the *GDPoweR* project.

Name and Signature	Date

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