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Introduction

Within the process of platformisation (van Dijck, 2018) the experience of labour, traditionally place-bound, is increasingly fragmented and embedded in global competition through digital labour platforms (DLPs) matching clients and workers by means of algorithms (OECD, 2019). The rise of transnational DLPs poses new questions for comparative industrial relations and new threats for existing regulations and collective representation (Wood et al., 2019; Vandaele, 2018). Moreover, in most European countries, the collective representation of platform workers is particularly hampered by their legal status as 'independent contractors', their geographical dispersion, and working in isolation, mainly (but not exclusively) online, to perform both low and high-skilled tasks.

Through the presentation of a comparative ethnography conducted in France and Italy, this article aims to contribute to comparative debates on the representation of platform workers. Drawing on Hyman and Gumbrell-McCormick's concept of 'variable geometry of resistance' (2017), it investigates – within two countries traditionally clustered in the same industrial relations model – similarities and differences in the discourses and practices of collective actors dealing with the representation of platform workers, focusing on how collective actors discursively represent platform workers and how their discourses are translated into effective practices of collective representation.

Representing non-standard workers: The case of platform workers

In the last two decades, comparative studies of trade union strategies towards non-standard and precarious work have multiplied (Gumbrell-McCormick, 2011; Heery, 2009; Keune, 2013; Pernicka, 2005). Early on, in Europe the stress was on how unions reacted opportunistically to external changes (Hyman, 1996) and opened their doors to formerly excluded groups of precarious workers mainly to offset the problem of membership losses (Behrens et al., 2003; Pernicka, 2005). More recently, several studies have instead analysed union revitalization strategies (Frege and Kelly, 2004) aimed at recruiting and organising non-standard workers, with a view to improving their working conditions in different sectors and national settings (Gumbrell-McCormick and Hyman, 2018 [2013]; Ibsen and Tapia, 2017; Keune and Pedaci, 2019; Meardi, Simms and Adam, 2019). Indeed, since non-standard work has become more 'typical', trade unions have been pushed to reframe their organising strategies (Gumbrell-McCormick, 2011) and the interests of non-standard workers – however vulnerable, dispersed and heterogeneous (Benassi and Dorigatti, 2015) – have been slowly but progressively included within the scope of traditional trade unions in essentially three ways: subordinate to those of standard workers; tackled in the same way as those of standard workers; and addressed differently for different categories of workers (Heery, 2009). Keune and Pedaci (2019), focusing on specific sectors where precarious workers are overrepresented, underlined how unions faced similar challenges across countries in the same sector, and developed similar strategies aimed at counteracting the progressive erosion of the quality of work, involving the redefinition of unions' identities.

Amid the complexity of non-standard employment, platform workers have occupied a particularly problematic position, because they are mainly self-employed and increasingly hyper-individualised. The debate about who works through DLPs has been mainly concerned with how platform work is performed and experienced (Howcroft and Bergvall-Kåreborn, 2019; Ford and Honan, 2019; Kaine and Josserand, 2019). Recently, studies have emerged that are concerned with the first attempts by trade unions and other collective actors to represent and organise this specific category of workers (Lenaerts et al., 2018; Vandaele, 2018).

By building on the experience of *Ver.di-Selbstständige* in Germany, Haake (2017) urged trade unions to overcome their ‘historical box and to do more than just spotlight shortcomings and call for political action’ (Haake, 2017: 63). According to this perspective, the renewal of trade union structures and cultures through the organising of platform workers is a strategic choice aimed at claiming decent work and income levels for all those who work through DLPs, both employees and self-employed. This position assumes that the erosion of workers’ rights, whether they work online or offline, is always a threat to all workers, including those in full-time and permanent employment, who have historically been the backbone of trade unions (Hyman and Gumbrell-McCormick, 2017).

Other authors have instead discussed the opportunities for alliances between unions and alternative actors (Meardi et al., 2019; Vandaele, 2018) to increase the capacity to represent platform workers. In particular, building on the interpretative framework originally developed by Offe and Wiesenthal (1980), Vandaele (2018) considered the two logics of collective actions – membership and influence – on the representation of platform workers. According to this perspective, among trade unions, quasi-unions, and labour market intermediaries, the logic of influence prevails, which is mainly based on the relationships between the organisation and its interlocutors, namely employer associations and public institutions. However, in the context of platform work, this logic faces significant obstacles, since DLPs are reluctant to enter into a dialogue with both organised associations of workers and public institutions, and ‘institution-building is currently non-existent’ (Vandaele, 2018: 19). The logic of membership prevails instead among activist groups, such as work-led platform cooperatives, grassroots unions and union-affiliated guilds. Representation, in this case, starts from direct support aimed at giving voice to and building solidarity among workers, in order to face common problems, as well as increasing their associational and bargaining power.

Recent studies have noticed that platform workers’ organising has occurred particularly among those performing their jobs offline, as in the case of food-delivery riders and drivers of private hire vehicles (Abdelnour and Bernard, 2019; Bouvier, 2018; Chesta et al., 2019; Cini and Goldmann, 2020; Leonardi et al., 2019; Tassinari and Maccarrone, 2017, 2019). These works have shown that trade unions, while sometimes present, were generally not the main actors organising these workers. Self-organised workers’ collectives, grassroots unions and groups of activists were those who

mobilized the most. Moreover, trust and solidarity emerged as transversal elements necessary for a potential collective action. However, although platform work has become a global phenomenon, how this is experienced and consequently resisted is certainly not the same everywhere. Indeed, in the only study among those mentioned that was conducted in two different European countries, Tassinari and Maccarrone (2019) pointed out that actions aimed at mobilising food delivery couriers in the UK and Italy are context-specific, as worker agency interacts with different institutional environments. To advance the comparative understanding of platform workers' representation, we look at two contexts with relatively similar industrial relations systems, with the aim to explore the main differences among dimensions that were of interest to the investigation, such as the forms of platform workers' representation. More specifically, we draw on Hyman and Gumbrell-McCormick's concept of 'variable geometry of resistance', which refers to 'three aspects of unevenness: the relationship between the global and the local; that between trade unions and other vectors of protest; and the challenge of crafting solidarity from diversity' (2017: 555). In analysing emerging forms of representation in platform work, we therefore aimed to understand whether in the countries studied the three dimensions composing the 'geography of resistance' – global/local; unions/alternative actors; and specific/extended forms of solidarity – were complementary or competitive, alternatives or substitutes. To draw appropriate conclusions, we illustrated the gaps between discourses and practices. Indeed, as will be shown in the findings, trade unions and grassroots groups differ more in terms of practices than in discourses.

In our study, discourses are considered as contributing to organisations' sensemaking processes, while for practices we look at the activities of recruiting and organising. The articulations between discourses and practices, and the discrepancies between what people say they do and what they can be seen to be doing, are typical topics investigated by the ethnography of organisations (Ybema et al., 2009). Within the wide range of comparative studies in industrial relations, this study therefore also has the ambition to respond to the call made by several authors (Almond and Connolly, 2020; Murray et al., 2010) to favour, where possible, in-depth comparisons, based on long-term engagement with the social contexts under study rather than only on the voice of the official representatives of the organisations studied (Almond and Connolly, 2020).

The two national contexts

In their study on unions in Western Europe, Gumbrell-McCormick and Hyman (2018 [2013]) grouped countries into four clusters: Nordic, Central, Anglophone and Southern. The Southern cluster includes France and Italy and is characterised by a relatively late industrialisation and traditionally politically divided unions with the largest union originally close to the Communist Party. In addition, in both countries, the representation of platform workers is carried out by both trade unions and grassroots groups. Such similarities between France and Italy allowed us to explore the main differences in the representation of platform workers in more depth, especially in terms of the most relevant cities, collective actors and strategies implemented.

France

Over the years French trade unions have adapted their structures to organise precarious workers. The CGT (*Confédération générale du travail*) for instance created the *Union syndicale de l'interim* in 1968 for agency workers. CGT and CFDT (*Confédération française démocratique du Travail*) have organised several campaigns for marginal workers (Hyman and Gumbrell-McCormick, 2017), including undocumented migrant workers (Meardi et al., 2019). SUD-Solidaire also tried to mobilise precarious workers, as in the case of subcontracted cleaners in the railway sector (Connolly, 2010).

Focusing on platform work, some trade unions conducted early attempts to organise mainly food-delivery riders and drivers of private hire vehicles. In particular, CGT started organising riders in Bordeaux (and then in other cities, such as Lyon, Nantes and Dijon), while CFDT and UNSA (*Union nationale des syndicats autonomes*) addressed Uber drivers (Abdelnour and Bernard, 2019).

Grassroots groups have also emerged, such as the CLAP (*Collectif des Livreurs Autonomes de Paris*), created in 2017 and composed of food-delivery riders, some of whom contributed to the creation of Coopcycle (Chagny, 2019), a federation of food-delivery cooperatives, and CAPA-VTC, created in 2015 by private hire vehicle drivers, which mobilised against Uber tariffs in 2016 and subsequently affiliated with the trade union FO (*Force Ouvrière*) (Abdelnour and Bernard, 2019).

In terms of workers' rights, the so-called El-Khomri labour reform (Act n. 2016-1088) recognised the 'social liability of platforms towards (professional) self-employed workers' (De Stefano and Aloisi, 2018a: 31), obliging DLPs to pay insurance and health contributions and to provide training. Moreover, platform workers have the right to organise and strike, and DLPs cannot terminate contracts for this reason (article L.7342-5 of the labour code). Despite the introduction of these measures, DLPs still represent a challenging anomaly for the French system of industrial relations: social dialogue is limited to the voluntary participation of stakeholders in specific one-off events, as in the case of the initiatives *France Stratégie* and *Sharers&Workers* promoted in 2016 by the French agency for social affairs (IGAS) with the aim to discuss its recommendation on platform workers' social protection. The growing attention to DLPs, fostered by several policy reports, as well as the media debate, keeps raising union interest in platform work.

Italy

In Italy, the collective representation of non-standard workers became a relevant topic for trade unions in the late 1990s, when separate categories were created: NIdiL within the CGIL (*Confederazione Generale Italiana del Lavoro*), FELSA within the CISL (*Confederazione Italiana Sindacati Lavoratori*) and UIL-Temp within the UIL (*Unione Italiana del Lavoro*). These initiatives have been double-edged: while offering a dedicated branch of the union, at the same time they also had the side effect of segregating non-standard workers and creating competition between the new structures and traditional union branches (Murgia and Selmi, 2012). NIdiL, FELSA and UIL-Temp have taken time to develop distinctive strategies to organise precarious workers. It was only in the late 2000s that NIdiL-CGIL in particular decided to focus more on organising such workers (Choi and Mattoni, 2010), especially at the local level. It was mainly grassroots groups that, since the early 2000s, have supported the mobilisations against precarious work, 'with varying degrees of engagement with trade unions, from collaboration to competition to mutual indifference' (Meardi et al., 2019: 11). On many occasions a rather adversarial relationship between trade unions and grassroots groups was observed,

as was the case with the *San Precario* movement, which started in Milan in 2001 involving separate May Day demonstrations from the official union ones.

More recently, in relation to platform work traditional trade unions have made some embryonic attempts to organise riders (e.g. CGIL in Pavia, UIL in Milan) and have signed some largely symbolic agreements at local levels (De Stefano and Aloisi, 2018b). Grassroots groups have been most active in the cities of Turin, Milan, Bologna and Florence (Chesta et al., 2019; Leonardi et al., 2019). These groups are in contact with each other but have quite distinctive political orientations within the left-wing political area, with different interests in the representation of platform workers. *Deliverance Project* was created in 2016, at the time of the first protest organised in Turin. At first, the leftist union Si-Cobas was also active in this context, but soon divergences emerged in relation to both methods and aims (Tassinari and Maccarrone, 2017). Shortly after, other groups were created in Milan (*Deliverance Milano*), Bologna (*Riders Union Bologna*) and Florence (*Firenze Riders*), the latter in connection with CGIL.

In 2019 the Italian parliament passed a law to regulate the work of food (and goods) delivery mediated by DLPs, and therefore only a limited portion of platform work (Act 128/2019). The law introduced the mandatory written contract, minimum levels of protection for both employees and self-employed, and includes the application of anti-discrimination law. Moreover, it limits arbitrariness in compensation, introducing a minimum hourly fee, forbidding piecework and establishing a supplementary allowance of at least 10% for work done at night, on public holidays or in adverse weather conditions. At the end of the following year, Assodelivery – the association representing the main food delivery platforms – after having officially declared its availability to discuss the law with the most representative trade unions, then signed an agreement with UGL, a minor right-wing trade union, to evade the obligations prescribed by law 128/2019.

Methodology

From a methodological point of view, we position our study within the framework for comparative qualitative research in industrial relations (Almond and Connolly, 2020; Murray et al., 2010). In an

attempt to interpret the existing polyphony of meanings and actions among the studied unions and alternative actors, our research is based on a cross-national ethnography (Hannerz, 2003) on the collective representation of solo self-employed workers in Europe (Murgia et al., 2020). The research was conducted simultaneously in three countries – France, Italy and Slovakia – and included six months of extensive ethnographic fieldwork, carried out between July and December 2018 by three native-speaking researchers. Among the sectors in which self-employment representation was becoming more established, both in France and Italy, discourses and actions around platform work emerged as central. In both countries, in fact, DLPs were at the centre of public debates and addressed by both trade unions and grassroots groups, as well as widely investigated by academics (Bouvier, 2018; Abdelnour and Bernard, 2019; Chesta et al., 2019; Leonardi et al., 2019). Conversely, in Slovakia, at the time of the research, no activities related to the representation of platform workers were found. This was not surprising, given that the available studies show that Slovakia currently has the lowest incidence and frequency of platform workers in Europe (Brancati Urzi et al., 2020).

Focusing on France and Italy, we studied both trade unions and grassroots groups that had started organising platform workers and that, at the time of the fieldwork, were focusing their activities, with few exceptions, on food-delivery riders and, in France, also on drivers of private hire vehicles. In both cases, the workforce was composed mainly of relatively young men and in many cases first- or second-generation migrants. Ten organisations were involved in the research sample, five in each country, as outlined in Table 1. As far as grassroots groups are concerned, it is worth pointing out that despite being spontaneous worker groups, in both France and Italy they were also composed of some members of pre-existing activist groups. In some cases, this was accidental, in others, working as a rider was a strategy to mobilise platform workers.

Table 1 – List of the studied organisations

FRANCE

Unions

Confédération Française Démocratique du Travail (CFDT)

Confédération Générale du Travail (CGT)

Force Ouvrière (FO)

Union Syndicale Solidaires (SUD)

Grassroots groups

Collectif des livreurs autonomes de Paris (CLAP)

ITALY

Unions

Confederazione Generale Italiana del Lavoro (CGIL)

Confederazione Italiana Sindacati Lavoratori (CISL)

Unione Italiana del Lavoro (UIL)

Grassroots groups

Camere del Lavoro Autonomo e Precario (Chambers of autonomous and precarious labour)

Deliverance Milano

Access and the terms of cooperation were negotiated in both countries with the headquarters of the organisations, mainly in Paris and Milan. Once the fieldwork had begun, we followed the actors on the basis of their national relevance, but also on the intensity of their activities, thus conducting the research in other cities (Bordeaux and Rome). We were allowed to participate in internal meetings, public events, demonstrations and pickets. This allowed us to acquire an in-depth knowledge, as interpreted by local actors on the ground, and to understand the relationship between a global phenomenon, such as platform work, with both regulatory and social actors at local and national levels.

In addition to the participant observation, 29 semi-structured interviews were conducted – 14 in France and 15 in Italy – especially in cases where a deeper access to the field was not possible, and also to discuss step-by-step our interpretations with the research participants. The direct and continuous contact with key informants allowed us to maintain a constant and informal exchange with them, both in their presence and at a distance. We were also provided with a range of materials

intended for internal and external use as reports, leaflets and articles posted on social media, such as announcements or discussions about organised events. Data was collected in French and Italian. Both fieldnotes and interview transcriptions were then translated and digitised in English to make them available – through a remotely accessible server – to the whole research team. Research participants were asked how platform workers were addressed by their organisations, how they were framed, and were invited to report any actual practice of collective representation, drawing upon recent events and collective actions, for example.

Fieldnotes, interview transcripts and collected documents were subjected to thematic analysis (Boyatzis, 1998), following an inductive approach. In particular, the analysis was applied to each set of qualitative research materials using Atlas.ti 8. In a first phase, two researchers coded the transcribed fieldnotes and interviews independently and the different interpretations were discussed collectively within the team. This allowed us to add new themes to the coding frame as they emerged, including paying special attention to the gaps between discourses and practices in the studied organisations. In a second phase, open coding was applied to the remaining transcripts, until all available data was organised into categories.

Discursive representations of platform workers

Starting from different backgrounds, at the time of the fieldwork both unions and grassroots groups were trying to build a grounded knowledge of platform workers. Discourses were mainly informed by the international debate on digitalisation on a global scale fostered by different subjects, such as academic scholars, public institutions, and trade unions' research centres, with a critical view on threats and opportunities created by DLPs.

In France, recurrent symbolic references were made to the *uberisation* of the economy as an extreme form of precariousness, among both trade unions and grassroots groups. During the interviews with trade unionists, as well as in the collected documents of the unions, we noticed recurrent links between DLPs and the disruptive deregulation trends.

The ‘uberisation’ of the economy implies the unbridled deregulation of even the most regulated professions and sectors. [...] platforms are extending to all sectors with the common factor being the extreme precariousness of workers. (CGT, Minutes of the 15th congress - Federation of Trade and Services, 2018)

DLPs were perceived as a new player, contributing to increasing the already existing trends towards precarious work, fostering competition between standard employees and workers with fewer rights (CGT, Int. 1), who suffer to a greater extent from a lack of social protection (CFDT, Int. 2). Like trade unions, activists from CLAP, a riders’ collective, frequently mentioned the increasing precarisation fostered by DLPs:

Uberisation is a kind of mix between outsourcing and temporary work, which contributes to the precarisation of people and to the destruction of wage-employment. This is an outbreak we need to fight. (CLAP, Int. 1)

Similarly, Italian unions constantly mentioned the global challenges of digitalisation:

Algorithms are not governing just platform workers... Think about logistics workers of Amazon: their movements, their performances are totally controlled by algorithms. We must negotiate the algorithm! (CGIL, Int. 1)

Inside CGIL, ‘negotiating the algorithm’ was the main motto, originating in a long internal discussion that resulted in the report ‘Negotiating digital innovation’ for the 2019 national congress (CGIL, Int. 2), where discussions took place on how to negotiate work organisation and how to make the data collected and the calculations made by companies more transparent. Interviewed CGIL trade unionists also argued that a fruitful method was participation in the creation of legislative frameworks both at national and European levels, in particular through the ETUC.

As in France, in Italy the discourses on platforms were also similar between unions and activist groups, all linking DLPs with precarisation. In particular, one activist claimed:

The working conditions conveyed by food-delivery DLPs are not an absolute novelty; they are rather an updated version of the standard condition experienced by dishwashers, waiters and traditional deliverymen. These workers have long been used to deal with precarious work, lack of protection, bogus contracts or moonlighting. What is different is the increasing competition and exploitation that riders have to deal with, working through the platforms here in Rome as well as in London or Berlin. (Camere del Lavoro Autonomo e Precario, Int. 1)

Both trade unions and grassroots groups in the two countries devoted significant attention to how collective representation may be rethought to include platform workers as well. The evidence collected among French trade unions showed how they conceived the representation of platform workers mainly in relation to standard employees, their traditional members:

It's very important to be there, otherwise, there'll be a generalised social dumping, and we'll put employees in competition with workers who have far fewer rights (CGT, Int. 1).

On several occasions during the research, CGT, FO and Solidaires unionists described employees as the reference point and platform workers as vulnerable workers who can threaten the stability of a system based mainly on standard work. Indeed, on the one side, they would like to continue using their traditional strategies to curb platform work and tackle the precarious aspects of such work

arrangements. At the same time, the trade unions recognised the importance of improving specific approaches and strategies for platform workers' representation.

When we discussed the amendments of our statute of our federation, I insisted that the term 'platform workers' was maintained as it was. What made me aware of the phenomenon was the fact that, in any case, abroad and in particular in the UK, where we have international contacts and exchanges, these workers are starting to organise themselves in specific groups. (Solidaires, Int. 3)

For this unionist, using the name 'platform workers' in the statute was a demarcation effort that attempted to frame an emerging group of workers with specific traits as part of the union movement in their own right.

In their discourse, activists tended to focus on the most vulnerable within the broad category of platform workers:

The platformisation concerns several professions, but I'm especially thinking of babysitters and domestic workers. They will not have the energy, the will... I'm not talking about courage, but the tendency to rebellion that riders or VTCs [hire car with driver] have, that is, when there's a problem, we go out on the street and we make a mess. They're invisible and they're so precarious they won't say anything. (CLAP, Int. 2)

In unions' and grassroots groups' discourses platform workers are mainly food-delivery riders and, especially in France, drivers of private hire vehicles, although there is awareness that there are platform workers who are even more invisible and difficult to organise.

In both countries the dominant union discourse is twofold: on the one hand, it highlights the need to foster a collective approach to represent both standard and non-standard workers; on the other

hand, it underlines the importance of building trust relationships, which are still missing, with platform workers specifically.

We risk forgetting that behind each platform there are workers in the flesh, and we must search for them where they really are. We have to re-bind work, platform work especially, within a collective social frame where workers can perceive and practice solidarity and organisations can foster it. (CGIL, Int.4)

As far as grassroots groups are concerned, while in France we identified discourses focused on the most vulnerable platform workers, in Italy the attempt was rather to build a common narrative with other activist groups. This was the case of Deliverance Milano which, in preparing the 2019 May Day demonstration, was trying to build discursive bridges between different activists' networks.

We are more than food-delivery riders. We want to broaden the conflict away from the existing public discussion, which focuses only on better payment and social protection for riders. Our perspective intertwines with other groups such as 'Non Una di Meno' [a transfeminist network] and with groups claiming the right to the city, to public spaces, to accessible rents, fighting speculation and gentrification processes. (Deliverance Milano, Fieldnotes 9)

In this case, representing platform workers meant – as claimed by other groups of activists involved in organising the parade – forcing the imagery built by the mainstream debate, focused mainly on riders, through discourses able to re-connect these workers with people (therefore also potential consumers) and people with the city.

Despite the cross-country similarities in discourses, we detected differences in how trade unions and alternative actors discursively position each other. In the French case, trade unions and alternative actors expressed mutual respect and willingness to cooperate.

‘Interactions aren’t easy, but they’re worth it’. It was claimed by a unionist during the break of a one-day seminar of CGT in Paris, where the situation of riders was mentioned during the conclusion. The unionist explained to me that since CLAP had been created more than one year earlier, the intention of CGT was to support the independent growth of this grassroots group, together with other trade unions.

(CGT, Fieldnotes 11)

This does not mean that mutual relations were without tensions. During the fieldwork, we frequently heard expressions from activists like ‘for traditional unions we are like UFOs’ (CLAP, Fieldnotes 15).

In the Italian case, a stronger mutual distrust emerged on several occasions in the discourses of both trade unionists and activists. While CISL and UIL hardly considered activist groups as interlocutors, CGIL built a more dialectical, often conflictual, relationship with local activists. A considerable sense of mistrust emerged for instance around the representation of food-delivery riders:

Many of the riders I spoke with reminded me a bit of the Californian surfers in the 1960s, who were part of a culture... during the dialogue it emerged that the values they referred to were in some cases in opposition to unions’ values. It’s not a coincidence that the riders approached non-confederal unions or grassroots groups. (CGIL, Int. 1)

Among activists the sense of distrust and distance from trade unions was also quite diffuse. Activists represented themselves as the defence frontline for different groups of precarious workers who had been neglected by traditional unions. Indeed, both grassroots groups studied in Italy blamed the unions for their insufficient opposition to labour market reforms. During an internal meeting, one of the coordinators of Deliverance Milano shared his ideas on trade unions:

‘We give voice to precarious subjects that no one else really wants to represent [...]’. We started representing riders when trade unions didn’t even know who they were’. During the meeting, several activists criticised the way trade unions were occupying the public debate on riders without a real commitment in organising them. (Deliverance Milano, Fieldnotes 12)

During the research, Deliverance Milano – which had its headquarters in the place where the San Precario movement was created – claimed a pioneering role in representing platform workers, in opposition to trade unions. The connection with this movement was more than symbolic as the self-organised group of riders – most with little or no previous political experience – also included some activists from the San Precario network. The antagonism of grassroots groups in front of trade unions was then also directly connected to discourses supported by pre-existing activist groups: the claims of activists about the unrepresented precarious workforce of recent decades were indeed modernised to include platform workers.

Actual representation of platform workers

At the time of the fieldwork, only a handful of platform workers’ collective representation practices were identified. In this section, we mainly focus on the practices of recruiting and organising, while lobbying and collective bargaining, which were mentioned at embryonic levels, if at all, remain outside the scope of this study.

Among trade unions in both countries, we found initiatives aimed at supporting platform workers in the more general frame of self-employment. In France, for example, CFDT created the ‘Union’ platform, which aimed to combine representation and services for freelancers of all sectors; in Italy CISL implemented an online community for freelancers, some of them also working through DLPs. As already mentioned, however, with few exceptions, almost all initiatives were concentrated on food-delivery riders and, in France, on private-hire drivers.

Among French unions, we found examples of three different strategies. The first was the creation *ex nihilo* of new branches; this was the case of CFDT with Uber drivers:

We didn't rely on pre-existing collectives, we really went to the gas stations to get them, but that's because we decided to invest a lot in Uber drivers. This makes it a much heavier job than what is usually done to create a new branch. (CFDT, Int. 1)

With local branches in Nice and Bordeaux, and a physical space close to Paris with weekly information desks, CFDT VTC-Loti had around 100 members.

A second strategy consisted of creating new branches thanks to the inclusion of a pre-existing collective. From 2015, the union FO started publishing press releases denouncing the disruptive effects of uberisation on work organisation, hoping to be contacted by platform workers who would agree with their analysis. They were actually approached by a self-organised group of drivers, which resulted in the creation of the FO-Capa VTC trade union branch – for drivers of private hire vehicles – despite the initial reluctance of the taxi drivers' branch.

They got organised through social networks, promoting small demonstrations.

They had no institutional status, and therefore the government didn't receive them.

So, joining the union was a way of overcoming the problem. (FO, Int. 1)

This new branch organised demonstrations to ask the government to introduce a minimum remuneration for VTC drivers. A similar process happened within the CGT in Bordeaux: a pre-existing grassroots group of riders started organising their meetings in the CGT premises, and after a while they associated to the union. In both cases, the emergence of new branches generated some tensions within the unions, especially because most workers did not want to be classified as employees by DLPs, whereas both FO and CGT have historically been very attached to the defence of waged employment.

The third strategy consisted of providing support to self-organised groups of platform workers, which however remained independent. Indeed, the CLAP was supported by both CGT and Solidaires, and more recently by the union CNT-SO (*Confédération nationale des travailleurs - Solidarité ouvrière*) as well. The fact that most CLAP founders were already members of trade unions or political movements facilitated this alliance:

This is how I often describe the birth of CLAP: it's not a story of riders who became activists, but a story of activists, including myself, who became riders. Among us, there were also student activists. So, we all shared the same common thought: a growing phenomenon that deserved to be tackled, studied, and fought. (CLAP, Int. 1)

As observed in Italy, the presence in CLAP of activists from previous political experiences triggered the process of organising among riders. At the same time, this did not prevent the building of relationships with trade unions. At the time of the fieldwork, union support – such as the capacity to fund train tickets for the national meetings – as well as the political influence that allowed an easier access to bargaining spaces were particularly appreciated by CLAP members. With union support, indeed, they organised many strikes and demonstrations, especially against the reduction of piecework rates by DLPs. However, there were important differences in terms of methods and goals between CLAP and trade unions.

We're not fans of trade union membership cards. We are not card sellers, so we can't do this every time a rider comes to us asking for information. (CLAP, Int. 2)

The interaction between trade unions and CLAP was therefore characterised by some relevant distances in perspectives, practices and interpretations. As mentioned above, however, this did not

preclude collaborations that fostered mutual learning and attempts to renew organisational cultures and structures.

In Italy, instead, trade unions privileged direct but limited activities of recruiting and organising, as a result of varying local strategies and limited resource investment:

For months I've been involved in online chats with some platforms where IT professionals worked. I spent hours trying to find the right approach. In some cases, the administrator banned me; in many other cases workers were just focused on job opportunities, not on my proposals. So, I decided to shift to riders of food delivery, and I started to take contacts organising info sessions. I'm the only one in the union in charge of platform workers' organising, together with daily duties related to the tourism, commerce and service sector. (UIL, Int. 3)

CGIL respondents mentioned ongoing practices of organising with food-delivery riders in Bologna, Florence and Pavia. The first was also the only relevant attempt, at national level, of coordination with a local grassroots group – Rider Union Bologna – involving joint demonstrations and the negotiation of a 'Charter of fundamental rights of digital work in urban contexts' with the municipality in 2018 (the Charter, however symbolically powerful, was not binding, and the largest platforms did not sign it). In Florence, a CGIL trade unionist approached a group of ten Foodora riders, led by a young activist student, who then became a member of NidiL-CGIL. In Pavia, a young transport-sector unionist decided to become a rider as a direct way of building relationships with workers.

I became a rider for a few months to better understand the working conditions in that context. It was my decision, and my colleagues supported my choice, as well as my union and the local trade union centre. I was able to understand the everyday working problems; I built trustworthy relations with other riders, day by day. After some months, I was able to unionise around 20 riders. I'm convinced

that we have to go straight to the source recruiting and organising them. (CGIL, Int. 5)

The emphasis on building trustworthy relationships with workers was also at the core of the practices observed in Deliverance Milano. Unlike CLAP in France, this activist group was not supported by trade unions. Some of its members had been involved in the San Precario movement, the first in Italy to mobilise against growing precariousness. At the time of the fieldwork, Deliverance Milano still organised its meetings in the same headquarters, where posters of the May Day Parades remained on the walls (Deliverance Milano, Fieldnotes 18). During an internal meeting, one of the activists explained the strategies used to approach the riders, which were quite different – and hitherto more effective – than those used by the trade union:

One of the activists underlines why the participation of riders in the meetings is very difficult to achieve: ‘Sometimes they arrive so tired after work, that they just want to sleep or drink a beer’. In some meetings around 20 riders participate, but it’s difficult to go further, and continuity seems almost impossible. ‘Due to this reason, we must do our best to strengthen alliances with other activists, such as those dealing with migration or housing issues, and at the same time we must promote parties once or twice per month to approach and organise them’.

(Deliverance Milano, Fieldnotes 25)

The practices of organising therefore passed through networking with other activist groups and through ‘after work’ activities where all riders – activists and non-activists – could socialise without the constraints of a structured political assembly. At the same time, the activists were also in direct contact with riders in online chats and social networks, being able to perform counter-information and better understand the strategies of DLPs managers. These activities led to some forms of mobilisation and to some strikes by riders, who were then often disconnected by the platforms as retaliation. To

avoid exposing the riders, the activist group developed alternative strategies of organising. For instance, Deliverance Milano launched an online campaign triggering the debate on data management by DLPs. The activists published online a ‘blacklist’ of VIPs living in Milan, who did not give tips to riders; the news was commented on for days on newspapers and TV. This action targeted public opinion, overturning the way DLPs exploited the data collected from clients, workers and providers.

During the fieldwork, the activists were trying to build a network with several organisations, among them NAGA, an NGO focused on providing health services to undocumented migrants and refugees, many of whom worked as riders or in multi-service cooperatives. With trade unions, besides the described conflictual instances, interactions were quite frequent, especially during specific episodes of contention with DLPs. In these cases, the almost hidden dialogue passed mainly by personal relations between activists and a small number of trade unionists at the local level, mainly belonging to UIL, in Milan, and to CGIL, in other Italian cities.

Discussion

This article has made three main empirical points about the representation of platform workers in France and Italy. Following the three-pronged concept of ‘variable geometry of resistance’ (Hyman and Gumbrell-McCormick, 2017), the discourses and practices of collective actors can be analysed across all three dimensions.

First, the global dimension emerged especially in the discourses on platform workers’ representation, whereas the local dimension was quite evident in practice. In France and Italy, macro frames such as ‘uberisation’ and ‘digitalisation’ proved to be a common background across both trade unions and alternative actors. Discourses were influenced by the international debate on DLPs as agents of increasing competition and precarisation among both low- and high-skilled workers. Our findings show that the local dimension was particularly strategic in relation to practices of recruiting and organising. In all the specific cases detected – mainly concentrated on riders in both countries and drivers in France – practices were shaped around specific local conditions, such as the spatial

distribution of workers and the presence of other organisations. At local level virtual contacts became physical through discussions and mergers (e.g. FO-CAPA VTC). Local sites were reported as key for meetings (CGIL) and pre-political aggregation (CLAP, Deliverance Milano). Global and local, therefore, proved to be intertwined and complementary: the former prevailed in discourses, which aimed to draw a whole picture and an articulated knowledge of the phenomenon; the latter, the ground where the practices take shape and workers emerge 'in the flesh' from the discursive dimension. This corresponds to a gap, however unintentional, between discourses and practices, or between claimed broad constituency and actual local audience (Meardi et al., 2019).

Second, we detected significant differences, in this case in both discourses and practices, between French and Italian trade unions with respect of their strategies to include (or exclude) other vectors of protest. The former differentiated their approach to platform workers, combining the creation of new branches (CFDT with drivers) with the inclusion of a pre-existing collective (FO with drivers and CGT with riders) or the external support of emerging independent groups (as in the case of CGT and Solidaires with CLAP). On the other hand, Italian trade unions did not develop alliances with other actors, except on the odd occasion, and mainly privileged the creation of new branches, fostering a direct connection between trade unionists and riders who could play a leadership role within the union (as with CGIL in Florence) or were simply interested in unionisation (CGIL in Pavia and UIL in Milan). Therefore, in France, both trade unions and alternative actors expressed their will to foster their dialogue and alliances and were able to put this into practice, despite some tensions between traditional trade unions and grassroots groups. This was the case with CGT and Solidaires with CLAP at the time of the fieldwork, but also with FO with drivers of CAPA-VTC before their inclusion in the union structure. In Italy, instead, at the time of the fieldwork, mutual distrust dominated the attempts at dialogue and collaboration between trade unions (mainly CGIL and UIL) and grassroots groups. The dialogue in particular was kept alive only through the good personal relationships of a few trade unionists and some activists during specific events. The historical fracture between Italian trade unions and grassroots groups was then renewed in the case of platform workers' representation, limiting their opportunities for variable geometries of resistance.

Third, organisations tried to frame platform workers' interests by focusing on possible bonds of solidarity with other workers. Among both French and Italian trade unions, the prevailing discursive framework draws a strict connection between platform workers and standard workers. Several unionists insisted on the importance of representing platform workers as a way of reducing the risk of a race-to-the-bottom for standard employees (CGT, Solidaires and FO in France), of contrasting increasing segmentation (CGIL and UIL in Italy), and of extending social protections (CFDT in France). Grassroots groups in both countries tended instead to frame platform workers within the growing category of precarious workers, as the newest capitalist exploitative device. Therefore activists considered it necessary to build bridges of solidarity with the most invisible and exploitable among platform workers (CLAP) and with other alternative actors trying to mobilise workers around migrant, feminist and anti-gentrification issues (Deliverance Milano). This means that no significant differences were found between countries, but they were visible between traditional and alternative actors. In both countries, in fact, trade unions discursively supported the importance of including riders and drivers in their target population, that is to say standard employees. In France, alternative actors aimed instead to build a discourse that could reach all categories of platform workers, especially the most vulnerable ones; in Italy, the attempt was to build a common narrative with other activist groups able to speak to all precarious workers and, more generally, to all people at risk of exclusion. However, as far as practices are concerned, the few that existed were constructed by organising platform workers separately from other workers, both in trade unions and grassroots groups.

Conclusions

Our analysis of the discourses and practices used by French and Italian trade unions and grassroots groups involved in platform workers' representation shows disproportion between global discursive aspirations and local, limited practices.

In particular, the comparative research design illustrated that the three dimensions composing the concept of ‘variable geometries of resistance’ (Hyman and Gumbrell-McCormick, 2017) were characterised more by complementarity than by competitiveness. Indeed, in the case of platform work – a type of work that is expanding everywhere and is characterised by limited experiences of collective representation – our study found complementarities between global and local, between unions and grassroots groups, and between general and category-specific forms of representation. The global dimension was present in the discourses of all the collective actors representing platform workers and intertwined with practices of representation that were more anchored in the local dimension. Moreover, traditional trade unions and grassroots groups proved to need each other to generate forms of resistance: unions struggled to reach a category of workers that had never been approached before but which hold greater bargaining power vis-à-vis the DLPs and the public authorities; alternative actors were in turn more able to engage with platform workers but had no influence at the institutional level. Finally, the growth of the particular category of platform workers posed new challenges for building forms of solidarity. Both unions and grassroots groups aspired to build bridges with other workers, but representation practices to date had only involved platform workers.

This multifaceted approach avoids the rigidity of comparative juxtapositions and allows more consideration of local perspectives. In particular, in our analysis of the French and Italian case studies, we found mainly similarities in the global/local relationship and in the general/category-specific representation, and some differences concerning the presence (or absence) of alliances between traditional and alternative collective actors. If similarities can be attributed to the two relatively similar industrial relations systems, how should difference be interpreted? In the light of both our findings and the existing debate, it is possible to explain the observed differences through the fact that unions are stronger in Italy than in France, and therefore less keen on sharing their role with other collective actors (Gumbrell-McCormick and Hyman, 2018 [2013]). This has therefore meant that French unions, in order to strengthen their bargaining power vis-à-vis both DLPs and public authorities, are comparatively more strategically interested in building alliances with alternative collective actors. Italian unions, instead, primarily preferred to compete with grassroots groups for

their representation. At the same time, collaborations are in place, albeit limited to good personal relationships between some trade unionists and activists. Indeed, the approach of playing mainly at the institutional level, neglecting the organising of platform workers, quickly reveals its limits. In the absence of a consolidated regulatory framework, in fact, the inability to organise platform workers reduces the possibility of forcing DLPs into dialogue, and the picture is even more complex as they work as self-employed.

To conclude, what is at stake in future research is the understanding of when and how solidarity and cooperation between different categories of workers and between different collective actors can emerge; how this will lead to change over time and in different territories; and which geometries of resistance can ensure that platform workers are represented not only in discourses, but also in effective practices.

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