

## ► Decent work in the platform economy: Draft Convention and Recommendation – Reply form

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On 13 June 2025, the International Labour Conference, at its 113th Session in Geneva, adopted the resolution of the Standard-Setting Committee on Decent Work in the Platform Economy containing proposed Conclusions.<sup>1</sup> The Conference approved proposals for a Convention supplemented by a Recommendation concerning decent work in the platform economy.

In accordance with the resolution and article 46(6) of the Standing Orders of the Conference, the Office has prepared the texts of a draft Convention and Recommendation. Constituents are invited to inform the Office as to whether they have any changes to suggest or comments to make. In addition, the Office invites constituents' views on a number of questions indicated in Report V(3). Replies should be communicated to the Office **no later than 14 November 2025** in order to be considered by the Office.

Governments are requested to indicate if the most representative organizations of employers and workers were consulted before they finalized their replies. For countries that have ratified the Tripartite Consultation (International Labour Standards) Convention, 1976 (No. 144), such consultations are required.

To facilitate the Office's processing of replies, constituents are encouraged to respond in electronic format using the attached form. The use of this form is optional and would assist the Office to efficiently process the high number of expected replies from constituents. Constituents are free to respond in other formats. **All replies should be submitted by email to [platformeconomy@ilo.org](mailto:platformeconomy@ilo.org).**

The comments received will be reflected in the fourth and final report on the standard-setting item, which will be prepared by the Office for the consideration of the Conference at its 114th Session (June 2026).

### I. Respondent information

*Please provide the following information to assist the Office in processing your reply*

**1. Country**

Finland

**2. Organization type (government, employers' organization, workers' organization)**

Government

**3. Organization name (in full)**

Ministry of Economic Affairs and Employment

**4. Abbreviation (if applicable)**

Click or tap here to enter text.

### II. Consultation

Governments are requested to indicate if the most representative organizations of employers and workers were consulted before they finalized their replies.

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<sup>1</sup> ILO, *Outcome of the Standard-Setting Committee on Decent Work in the Platform Economy*, ILC.113/Record No. 6A and ILO, *Plenary sitting: Outcome of the Work of the Standard-Setting Committee on Decent Work in the Platform Economy*, ILC.113/Record No. 6C.

**Please indicate if consultation took place.**

Yes

**If yes, please indicate the names of the organizations consulted.**

The Confederation of Finnish Industries (EK), The Central Organization of Finnish Trade Unions (SAK), The Finnish Confederation of Salaried Employees (STTK), The Confederation of Unions for Academic Professionals in Finland (Akava), The Commission for Local Authority Employers (KT) and The Federation of Finnish Enterprises (SY)

**III. General comments**

**Constituents are invited to provide any general comments they may wish to make on the draft Convention and Recommendation in the box below.**

**General comments**

In multiple Articles and Paragraphs, the Office has introduced the phrase “according to the nature of work arrangements and the classification of digital platform workers’ status in employment.” For clarity, this should be simplified to “according to the classification of digital platform workers’ status in employment.” Including “the nature of work arrangements” could lead to confusion, as this term is less precise and it is unclear how it differs from classification.

We also point out that the phrase “according to the classification of digital platform workers’ status of employment” might not always provide enough flexibility to take into account the differences of those working in employment relationship and the self-employed (entrepreneurs). Additional flexibility might be needed if the provisions are too detailed.

**IV. Comments on the draft Convention**

Constituents are invited to provide any specific comments on, or suggested amendments to, the Articles of the draft Convention in the boxes below. Constituents are also invited to express their views on the Office’s commentary and questions relating to each Article.

*Please refer to the draft text on page 31 of Report V(3)*

**Preamble****Preamble – comments**

We propose to consider whether the following addition at the end of paragraph 4 would be useful: “...has created opportunities for enterprises and business development, also offering new pathways for the formalization of work.”

This would acknowledge that platform work may also play a role in enabling transitions from informal to formal employment.

**I. Definitions****Article 1 – comments**

Regarding the chapeau of Article 1(a), we support text as agreed in June. For Art 1(a)(i), as expressed in June, we prefer to have “organizes and facilitates”. For 1(a)(ii), we support the text agreed in June. For the chapeau of Art (1)(b), we support the text agreed in June but, at the same time, we stress

the importance for differentiation between platform workers in an employment relationship and self-employed in individual provisions, as to which group they should apply to. For Art (b)(i), as expressed in June, we prefer to have “organizes and facilitates”. For Articles (b)(ii), b(iii), the chapeau of Article 1(c), 1(c)(i), 1(c)(ii) we support the text agreed in June. For Art (1)(d), we support the suggestion to have the phrase “national laws and regulations”. We can support adding “or payment” after “remuneration”.

Regarding Article 1.(c), we wonder if the convention should be made more clear as regards to the definition or scope and take into account that this convention and the recommendation are not intended to affect the provisions of Convention No. 181 (Private employment agencies).

## II. Scope

### Article 2 – comments

We support the text agreed in June for Article 2.

Article 2.1 (a): We refer to our comments concerning Article 1.a). However, Finland shares the concerns expressed by the Office.

Article 2.1. b): The committee received an agreement on this text. We are wondering, whether also digital labour platforms can also operate in informal economy.

Article 2, paragraphs 2-5: Due to the scope of the convention, a member state’s possibility to exclude some digital labour platforms or platform workers from the application of the convention, may prove very important.

## III. Fundamental principles and rights at work

### Article 3 – comments

Finland supports the text for Article 3(1). It should be noted, however, that while a safe and healthy working environment (e) is a fundamental principle and right for all workers, the scope of rights, level of protection, and the mechanisms for implementation differ significantly between employees and self-employed.

For the sake of clarity and consistency, Article 3.1 could be in line with the agreed language of the Declaration on Fundamental Principles and Rights at Work. We therefore propose the following wording, which aligns with the Declaration:  
 “Each Member should, in relation to their obligation to respect, realize and promote fundamental principles and rights at work, take measures to ensure that digital platform workers enjoy the fundamental principles and rights at work.”

Regarding Article 3(2), we think it would be useful to maintain the original text, but are open to ways of simplifying it.

## IV. Occupational safety and health

### Article 4 – comments

Finland considers it important that the principles and obligations are clearly defined for national authorities, digital labour platforms, and workers, and that sufficient flexibility is ensured for Member States to address national differences concerning self-employed platform workers.

In line with this, Finland can support the Office's proposals to revise Article 4(1) and 4(2) in order to ensure sufficient flexibility in the application of the draft Convention. Given the broad scope of application, covering both employees and the self-employed, Finland considers that placing the obligations concerning occupational safety and health on Member States rather than on digital labour platforms may offer a flexible approach. This approach allows for the necessary differentiation in the level and means of protection, reflecting the distinct legal status and regulatory frameworks applicable to employees and the self-employed.

Finland can also support the proposal to require Member States to indicate the respective functions and responsibilities of public authorities, digital labour platforms, digital platform workers and other relevant actors.

Finland can support the proposal to move the current draft Article 4(2), which refers to specific preventive measures related to long working hours and insufficient rest periods, to the draft Recommendation. Given the broad scope of the draft Convention, covering both employees and the self-employed, Finland considers that addressing such detailed provisions in the Recommendation rather than in the Convention could be a suitable way to provide Member States with the necessary flexibility.

### Article 5 – comments

Finland emphasizes the importance of clearly defining the principles and obligations for national authorities, digital labour platforms, and workers, and ensuring sufficient flexibility for Member States to address national differences, particularly regarding self-employed platform workers.

In this context, Finland notes that Article 5, in its current, detailed form, could pose challenges for ratifying the Convention, due to the broad scope of the draft convention, which applies to both employees and the self-employed. Taking into account the differences in occupational safety and health prevention obligations applicable to employees and the self-employed, Finland can support the removal of Article 5 from the Convention as its current level of detail may not be compatible with the need for national-level flexibility.

### Article 6 – comments

Finland considers it important that the principles and obligations in Article 6 are clearly defined for national authorities, digital labour platforms, and workers, and that sufficient flexibility is ensured for Member States to address national differences regarding self-employed platform workers.

In this context, Finland notes that for employees, the right and duty set out in Article 6 aligns with existing OSH obligations. The concepts of "right to remove oneself", "undue consequences" and the "duty to inform" are well established in the context of employment relationships. However, for self-employed platform workers, who operate with greater autonomy and responsibility for their own safety and health, these concepts are less clear and may not be directly applicable. Finland therefore suggests that Article 6 be revised to better reflect the realities of self-employed platform workers.

As for the formulation of Article 6 (b), Finland notes that the duty to inform the digital labour platform is not clearly defined. It appears to refer to notification in connection with the exercise of the right under Article 6 (a), but this should be made explicit.

### Article 7 – comments

Finland underlines the need for clear definitions of the principles and obligations, and that sufficient flexibility is ensured for Member States to address national differences regarding self-employed platform workers.

Given the broad scope of the draft instrument, covering both employees and the self-employed, Finland can support the proposal to remove draft Article 7. Finland can agree that this aspect can be considered to be

covered by the proposed revised Article 4(2), which would outline the respective functions and responsibilities of all relevant actors, including digital platform workers.

## V. Violence and harassment

### Article 8 – comments

Finland can support the original text.

Considering the wide coverage of the draft instrument, which includes both employees and the self-employed, Finland, however, notes that wording of Article 8 could be more flexible. The forms and means of protection against violence and harassment may vary considerably depending on the worker's employment status. Finland therefore suggests including a phrase such as "according to the classification of digital platform workers' status in employment" in the text to better reflect these differences.

## VI. Employment promotion

### Article 9 – comments

We can support the original text.

However, the promotion of employment generally is desirable, but this objective is not dependent on the way in which work is organized. We would propose to consider to give flexibility in this Article by adding "as far as possible" after encourage. The text would read as follows:

"Each Member shall, according to national circumstances, pursue in their national policies, measures to promote the creation of decent jobs and to encourage, as far as possible, career and skills development in the platform economy, taking into account the goal of full, productive and freely chosen employment referred to in the Employment Policy Convention, 1964 (No. 122)."

## VII. Employment relationship

### Article 10 – comments

Regarding Article 10(1), We consider that this article should be moved after the "Fundamental principles and rights at work" chapter. We think that the measures each Member State undertake should be "effective and appropriate". We are open to moving Article 10(2) to the Recommendation.

## VIII. Remuneration

### Article 11 – comments

Regarding the title of the chapter ("Remuneration"), we are flexible as long as the principles and obligations are clear on national authorities, digital labour platforms, and workers, and enough flexibility is provided to Member States to address national differences regarding self-employed platform workers.

We can support adding "or payment" after "remuneration".

Chapeau of Article 11: we can support the updated Office proposal and add "or payment" after "remuneration", and suggest maintaining the phrase "piece-rate basis".

Art. 11(a): We support the updated ILO Office suggestion, while proposing to remove "the nature of work arrangements" from the updated Office proposal while, stressing that Member States must have flexibility to take national differences regarding self-employed platform workers into account and respect the fundamental

right to freedom of contract.  
 Articles 11(b) and 11(c): We support the original text.

Finland considers that if the requirement for adequate pay remains in the Convention, a clarification is needed for those in entrepreneurial positions. The concept of adequate remuneration should apply only to employed persons, as it is challenging for entrepreneurs to define what constitutes adequacy and who determines it. For entrepreneurs, the agreed reward should be the starting point. Unfair contract terms can be addressed separately.

For the adjustment of unfair or unreasonable terms, please refer to our comments on Article 21.

#### **Article 12 – comments**

We can support adding “or payment” after “remuneration”.

#### **Article 13 – comments**

We can support the original text with the addition of “or payment” after “remuneration”, while noting that it should be according to the conditions prescribed by national laws and regulations. We emphasise the importance of easily understandable information.

Please also see our comment in Article 21.

## **IX. Social security**

#### **Article 14 – comments**

Finland is of the view that the wording of the Article should be clarified so that equal treatment is required between persons in a similar labour market position. The current wording seems to refer to workers in an employment relationship and in a similar position (workers).

The text could be formulated as follows: “Each Member shall take measures to ensure that digital platform workers enjoy social security protection on terms no less favourable than those applicable to other employees or self-employed working in a comparable situation” to provide clarity.

Under the Finnish legislation, platform workers are either employees in an employment relationship or self-employed persons. The scope of application of the draft Convention covers currently the labour market position of self-employed persons and employees (“digital platform worker” means a person employed or engaged to work).

In Finland, the regulation on statutory social security applies to work performed via a platform in the same way as to any other work, but there are, however, differences in the legislation vis-à-vis the rights and insurance obligations concerning entrepreneurs/self-employed and employees in employment relationships. The wording of the draft Convention does not clearly indicate whether the wording allows the social security of platform workers in an employment relationship to be on an equal footing with other employees and that of platform workers in an entrepreneurial capacity to be on an equal footing with other self-employed, or whether all persons within the scope of the convention should be treated equally with employees (and their social security rights and obligations). From the Finnish point of view, the workable formulation or interpretation would require equal treatment between employees and self-employed separately.

The same comment may apply to other points with similar wording or comparison with “worker”, if employees and self-employed persons have a different position under national legislations.

## **X. Impact of the use of automated systems**

#### **Article 15 – comments**

We support text as agreed in June.

**Article 16 – comments**

For the chapeau of Art 16, we support the original text, as fundamental principles and rights at work are universal. Regarding 16(a), as in previous Articles, streamlining “remuneration or payment” is desirable, as resulting from the amended definition of Article 1(d). For Art 16(b), Finland prefers the term psychosocial “risks” rather than “hazards”.

As for Article 16(b), Finland notes that the obligation placed on digital labour platforms to ensure that their use of the automated systems does not have harmful effects on the safety and health of the digital platform workers applies to all workers, regardless of employment status. Finland draws attention to the potential interpretation of paragraph 16(b) in relation to self-employed workers. There may be multiple factors influencing whether the use of automated systems has harmful effects on the safety and health of platform workers, and many of these factors may lie outside the platform’s control in the case of the self-employed. In such situations, the platform’s ability to prevent harmful effects is inherently limited. Finland therefore suggests considering a clarification in the wording of Article 16 , to reflect that the platform’s obligation relates to effects arising directly from the platform’s own use of automated systems, and over which the platform has actual influence or control.

Adding the phrase 'according to the classification of digital platform workers' status in employment', as introduced by the Office, could bring the necessary flexibility to Article 16(b).

**Article 17 – comments**

For the chapeau of Art. 17, we support the original text. For 17(a), we support the original text. With regards to 17(b), we can be flexible on the Office proposal to replace “human review” with “review conducted by a human being”. We note the potential confusion that may arise from solely using the word “payment” in this context. However, to solve this, as well as ensure consistency of the text and eliminate future ambiguities on what the term “disbursement” would entail, we propose to amend point 17(b) as follows: “a human review of any decision that results in the refusal of disbursing remuneration or payment, or any other amount due to them, or suspension or deactivation of their account, or termination of their employment or engagement with a digital labour platform, or any other decision with a similar effect on the person performing digital platform work. Representatives of platform workers may act on behalf of platform workers to exercise this right.”

**XI. Protection of digital platform workers’ personal data and privacy****Article 18 – comments**

We support the original text.

## Article 19 – comments

For the chapeau and point (a) of Article 19, we support the original text. We suggest the following formulation for the Article 19(b): “concerning membership of workers’ organizations, participation in their activities, or the prediction of exercising fundamental rights”. This addition would also cover potential instances of inference in the likelihood to unionise, for instance by making significant decisions about platform workers based on data collected.

For points (c) and (d) of Art 19, we support the original text.

The Office has inquired whether subparagraphs a) to d) could be moved to the draft Recommendation. Finland could be flexible on this. If subparagraphs would stay in the Convention, Finland considers that subparagraph b) would require some flexibility in order to allow the processing of personal data concerning membership of workers’ organizations. The EU Data Protection Regulation prohibits the processing of such personal data unless processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law and in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject. Finland has used this possibilities and in its national legislation allows processing of trade union membership data necessary to comply with the specific rights and obligations of the controller in the field of labour law. For example, it has been agreed in collective agreements that the employer collects the employee's trade union membership fee from the employee's salary and pays it to the Union on behalf of the employee. To do this, the employer needs information on trade union membership.

Flexibility in subparagraph b) could be offered by adding “unless allowed in national laws and regulations, international labour standards or other relevant international instruments” to the end of the subparagraph. “unless allowed in international labour standards, other relevant international instruments or in national laws and only where international obligations are met and appropriate safeguards are enshrined in law.”

Finland considers that also point a) could be clarified. If, for example, a platform is required to maintain a system that allows platform workers to communicate with their representatives, this inevitably means that the platform processes personal data related to communication. It is crucial that platforms function in a manner that safeguards personal data. Naturally, the content of the messages should not be accessible, nor should the monitoring of platform workers’ communications be permitted.

## XII. Suspension or deactivation of account and termination of employment or engagement

### Article 20 – comments

We support this article and its goal of ensuring continued access to workers’ accounts and thus to work. In order to account for cases where officially no suspension or deactivation occurred, but where the worker would e.g. get less or no work allocated to them or gets less favourable timeslots allocated.

Regarding “unjustified grounds,” we believe that unreasonable contractual terms should also be referenced, in order to ensure coverage of situations involving self-employed persons. It seems that “unjustified grounds” appears to relate more closely to employment relationships.

Additionally, we propose considering the inclusion of language in the Article to address concerns where working or contractual conditions—such as remuneration or payment—are unreasonable. These situations could be subject to adjustment or reconciliation in accordance with national legislation and practice.

We suggest the following addition:

“Each Member should take measures to prohibit the restriction, suspension or deactivation of a digital platform worker’s account, or the termination of their employment or engagement with a digital labour platform, when it is based on discriminatory or otherwise unjustified or unreasonable grounds.”

### XIII. Terms and conditions of employment or engagement

#### Article 21 – comments

We support the original text of Article 21 if national laws and practices guaranteeing appropriate information of platform workers through different means are respected.

If modified as the Office proposed, Finland suggests to refer to the national law and practice at the beginning of the sentence. We also want to maintain the flexibility concerning the requirement of written contracts by keeping the previous formulation of the text and add “where possible through written contracts at the end of the sentence. The text would read as follows: “Each Member should take measures, in accordance with national law and practice, to ensure that digital platform workers are informed of the terms and conditions of their employment or engagement and receive regular information on their remuneration and any deductions made, in an appropriate, verifiable and easily understandable manner, where possible through written contracts.

In addition, we consider whether a text could be added in the Article to cover concerns and situations where working conditions or contractual conditions, such as remuneration, payment or compensation, are unreasonable. These could be adjusted/reconciled with according to the national legislation and practice.

“Unreasonable terms of employment or contracts should be able to adjust in accordance with national legislation and procedures.”

#### Article 22 – comments

We support the original text.

### XIV. Protection of migrants and refugees

#### Article 23 – comments

We can be flexible.

### XV. Dispute resolution and remedies

#### Article 24 – comments

We support the original text.

### XVI. Compliance and enforcement

#### Article 25 – comments

We support the Office’s change as it clarifies and streamlines the text. We would request the Office to further reflect on the ways in which an additional specification could be made, requiring that mechanisms be effective in supporting workers’ representatives in the representation and exercise of workers’ rights.

Finland notes that enforcement mechanisms differ depending on the employment status of platform workers. Workers in an employment relationship are covered by labour inspection systems, whereas self-employed platform workers fall under different regulatory frameworks.

### XVII. No less favourable treatment

#### Article 26 – comments

We support the original text.



## XVIII. Implementation

### Article 27 – comments

We support the original text.

### Article 28 – comments

Additional language should be added to clarify that all platform workers including those working through intermediaries should have the same level of protection as those who have a direct employment relationship with the digital labour platform. We would support language that ensures that Member States, in accordance with national law and practice, establish appropriate mechanisms, which shall include, where appropriate, joint and several liability systems

### Article 29 – comments

We support the original text.

### Article 30 – comments

We support the original text.

## XIX. Normative language

### Article 31 – comments

We support the text agreed in June.

## V. Comments on the draft Recommendation

Constituents are invited to provide any comments on, or suggested amendments to, the Paragraphs of the draft Recommendation in the boxes below. Constituents are also invited to express their views on the Office's commentary and questions relating to each Paragraph.

*Please refer to the draft text on page 38 of Report V(3)*

### Preamble

#### Paragraph 1 – comments

We support the updated text.

### I. Freedom of association, social dialogue and the role of employers' and workers' organizations

#### Paragraph 2 – comments

We support the original text.

#### Paragraph 3 – comments

We support the original text.

#### Paragraph 4 – comments

We prefer the original text as the obligation to implement ILO standards into national law lies with Member States, which should not interfere with social partners' autonomy.

#### Paragraph 5 – comments

We support the original text.

## II. Occupational safety and health

### Paragraph 6 – comments

We are flexible as indicated under 4(1) and 4(2) of the Convention above.

## III. Employment promotion

### Paragraph 7 – comments

We can support the original text. The promotion of employment is generally desirable. However, this objective is not dependent on the way in which work is organized (whether the work is platform work or something else).

### Paragraph 8 – comments

We support the original text.

## IV. Employment relationship

### Paragraph 9 – comments

We support the updated text and invite the Office to consider moving this point to the Convention.

## V. Remuneration and working time

### Paragraph 10 – comments

Regarding the title of the chapter (“Remuneration and working time”), we can support adding “or payment” after “remuneration”. Regarding Article 10, as outlined in previous comments, we support the phrase “remuneration or payment”, but we consider that this provision should be limited to platform workers in an employment relationship.

As regards self-employed persons (entrepreneurs), there is no legislation in Finland on the amount of payment. See also our comment and proposal in Article 21 on the possibility to adjust unreasonable terms and conditions.

### Paragraph 11 – comments

We can support adding “or payment” after “remuneration” in the chapeau of Article 11. For subparagraphs (a) and (b), we support the original text.

### Paragraph 12 – comments

We support the original text.

### Paragraph 13 – comments

We can support original text.

However, we consider the Office proposal would provide flexibility on this issue and enables Member States to regulate the conditions in which the deductions are made and fees and costs are charged.

### Paragraph 14 – comments

We support the original text, but remain flexible in considering alternatives.

### Paragraph 15 – comments

As regards the merging of 14 with 15, we would prefer maintaining the two paragraphs separate. We can support the addition of “or payment” after “remuneration”. For subparagraphs (a) to (c), we support the original text.

### Paragraph 16 – comments

We support the updated text. However, we would like to draw attention to the fact that a refusal from a working task may sometimes have consequences under national labour legislation or an agreement between a self-employed person (not in employment relationship) and a company if there are no proper or justified grounds for the refusal. That is why we suggest deleting the words “decline a task or.”

## VI. Social security

### Paragraph 17 – comments

Finland supports the updated text, if enough flexibility is provided to Member States to address national differences regarding the financing of the social protection systems. Deletion of the last part of the final sentence “...based on the principle of financial, fiscal and economic sustainability, with due regard to social justice and equity.” could also be considered.

### Paragraph 18 – comments

Finland considers this paragraph acceptable. Finland's statutory social security system covers the fields of social security covered by the ILO Convention No. 102, even though Finland has not ratified it. However, Finland has ratified several ILO Conventions, which partly replace the provisions of the above-mentioned Convention and/or guarantee more extensive rights. The Finnish regulation on statutory social security applies to platform work in the same way as to any other work. Formulation is compatible with national legislation and can be supported.

### Paragraph 19 – comments

Finland can support keeping Paragraph 19 in the Recommendation. However, if the shortening of this Recommendation is deemed desirable, this paragraph could be removed, since the added value seems limited.

### Paragraph 20 – comments

Finland supports removing this paragraph. The content and purpose of this paragraph are unclear as well as its application in practice especially from the perspective of a residence-based social security system. For example, it is unclear what “in the course of acquisition” would mean. Entries on the portability and maintenance of social security benefits across borders where the applicable social security legislation to a person changes, are viewed with reservations, except from the perspective of earnings-related pensions, where the portability of pensions and therefore maintaining acquired rights are clearer.

## VII. Impact of the use of automated systems

### Paragraph 21 – comments

We agree with the ILO's Office proposal, but consider that the notification could be extended also to digital labour platform workers and their representatives and, upon request, to national authorities.

We do not see a reason to not have notifications in cases where the working conditions are covered by collective agreements. Notification of changes enables both the authorities and the workers and their representatives to monitor the implementation of the collective agreements.

We suggest the text to read as follows: “Members should take measures to ensure that digital labour platforms notify digital platform workers, platform workers' representatives and, upon request, the competent authorities, of the use of automated systems mentioned in the Convention.”

Moreover, Finland considers that the exemption clause to the duty to notify - “unless the impact of such use on the working conditions of digital platform workers or their access to work is covered by a collective agreement” – seems ambiguous.

### Paragraph 22 – comments

We support the original text.

### Paragraph 23 – comments

We can support the original text.

However, Finland has concerns regarding the scope and implications of the Recommendation in Paragraph 23. The proposed content requirements for information to be notified to the competent authority - including the main parameters affecting working conditions or access to work, the extent of human intervention, and any changes to these elements - are very broad and detailed. In practice, this would impose a significant administrative burden on digital labour platforms and on the competent authorities responsible for receiving and processing such information. Furthermore, the recommendation lacks clarity regarding its purpose and intended use.

#### **Paragraph 24 – comments**

We support the original text.

### **VIII. Protection of digital platform workers' personal data and privacy**

#### **Paragraph 25 – comments**

We agree with the Office commentary that this principle is already covered in Article 18 of the Convention and therefore support the suggestion to remove Paragraph 25 from the Recommendation to ensure brevity of text.

#### **Paragraph 26 – comments**

We think there should be language to ensure the portability of personal data within the Convention.

### **IX. Terms and conditions of employment or engagement**

#### **Paragraph 27 – comments**

In the chapeau, we consider it important to include the phrase “in accordance with national legislation and practice”. For subparagraphs (a) to (f), we support the original text.

### **X. Protection of migrants and refugees**

#### **Paragraph 28 – comments**

We can support the original text.

### **XI. Dispute resolution and remedies**

#### **Paragraph 29 – comments**

To ensure that dispute resolution mechanisms and remedies can be effectively resorted to by digital labour platform workers, we would like to add the phrase “efficient and easily accessible” before “dispute resolution mechanisms and remedies”.

#### **Paragraph 30 – comments**

We suggest deleting at least “,including recognition of the right to stay lawfully in the territory to pursue their claim after their employment or engagement has ended”.

## **XII. Compliance and enforcement**

### **Paragraph 31 – comments**

We support the Office’s suggestion to remove this Paragraph.

### **Paragraph 32 – comments**

We can consider the Office’s suggestion to remove this Paragraph.

### **Paragraph 33 – comments**

We can support the original text.

However, Finland considers that the final part of the paragraph—“including by imposing reporting obligations on digital labour platforms”—is overly specific, as it highlights one particular measure. Given that Member States should have the flexibility to choose appropriate measures in line with their national contexts and legal frameworks, removing this part could be considered.

## **XIII. Implementation**

### **Paragraph 34 – comments**

We are flexible.

### **Paragraph 35 – comments**

We support the original text.