

Data Work in the ILO Platform Labor Convention

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Executive Summary

This policy report focuses on the International Labour Organization's proposed Convention concerning decent work in the platform economy (to be voted on in 2026) and the extent to which it addresses the labor issues faced by platform data workers, i.e., contractors for digital labor platforms who perform the human labor of producing training data for artificial intelligence systems. It summarizes the issues faced by those workers, which emerge both from their status as platform contractors and from the nature of the work, evaluates the current draft and offers recommendations to improve the proposed Convention. This report builds centrally on participatory research conducted with data workers through the Data Workers' Inquiry project

For labor representatives and delegates involved in the negotiations at the International Labour Conference, this report offers ambitious but concrete [policy recommendations](#). For those less familiar with data work, it provides a concise background and summary of the shared issues across the [platform economy](#) and [specificities of data work](#), succinctly bringing together findings from worker-led investigations, academic studies and journalistic accounts. More generally, the analysis of the [implications of the Platform Labour Convention](#) for platform data workers, highlights avenues for strategic partnerships and action, and identifies key gaps and limitations that remain to be addressed beyond the negotiations of this year's International Labour Conference.

Key Findings

Data Workers Face Distinctive Challenges Beyond General Platform Issues

Beyond the common platform problems of employment misclassification, algorithmic management and uncompensated time, data workers experience:

- Structural wage theft through mass rejections of work, payment in non-legal tender (e.g., Amazon gift cards) and loss of access to earnings from account suspensions
- Lack of recognition and advancement prospects, where skills are devalued, instructions are inadequate and work histories are lost upon suspension
- Concealment through non-disclosure agreements (NDAs), which also hinder collective organizing by prohibiting workers from disclosing their association to platforms or discussing work with peers
- Significant mental health harms from exposure to violent or traumatic content, compounded by isolation and hyper-competition between workers

The Proposed Convention Represents Important Advances for Data Workers

A crucial victory in the draft Convention is that it specifically includes non-location-based platform workers within its scope. It establishes that the laws of the country where work is performed shall govern working conditions (Article 18), mandates transparent terms of engagement (Article 17), requires remuneration in legal tender (Article 9), and sets transparency requirements for automated decision-making systems (Articles 12-14). If approved, the Convention will provide essential momentum and a universal point of reference for improving platform data workers' conditions.

The Convention's principles-based approach creates both useful vagueness, which offers avenues for strategic negotiation, and instances where nebulous principles water down effectiveness. Transparency requirements for the use of automated systems and mechanisms for human review (Article 12 and 14), are important advancements, even though they are insufficient, in themselves, to prevent abuses by the platforms. The broad mandate that these systems not infringe on the fundamental principles and rights at work (Article 13) is an example of useful vagueness and opens avenues for more comprehensive protections.

Critical Gaps Remain in the Current Draft

In some instances, the broad principles set out are too vague and diluted to promote effective protection. Workers' right to remove themselves from dangerous or harmful situations (Article 5) is formulated in such abstract terms that it compromises its stated aim. It places the burden of justification on workers, does not address whether the time dedicated to partially completing the work will be compensated and sets out no responsibilities for platforms to remedy and prevent repeated dangers.

Regarding the specificities of data work, the draft Convention falls short in:

- Not explicitly mentioning or considering mental health protections in occupational safety provisions
- Limiting dispute resolution mechanisms to account suspensions, without contemplating disputes over partially completed work or ownership of rejected outputs
- Restraining all the promotion of decent work to employment relationships, missing an opportunity to promote skill and experience recognition in platform work

This report also highlights more structural gaps:

- Secrecy and NDAs are entirely unaddressed, despite these practices systematically undermining freedom of association and collective bargaining. While most prominent in data work, this practice systematically erodes the realization of labor rights and requires urgent intervention
- Compensable time is not defined, leaving wage theft through unpaid training, waiting time and breaks unaddressed
- The employment relationship remains central, maintaining the distinction between employees and independent contractors that platforms exploit

Policy Recommendations

To better address data workers' issues within the spirit of a principles-based convention, this report recommends:

1. Explicitly mentioning mental health on occupational safety and health, addressing psychosocial risk factors and aligning with ILO Convention No. 155
2. Limiting the use of non-disclosure agreements that bar workers from communicating about their work or organizing collectively
3. Defining compensable time to include training, waiting and preparation activities essential to platform work
4. Expanding the scope of human review for task rejections to address partially completed work and ownership of outputs
5. Promoting decent work through recognition of skills by supporting transparent, transferable work histories across platforms

These recommendations aim to strengthen the proposed Convention's effectiveness for the millions of data workers globally who remain hidden in the shadows of AI supply chains.

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Data Work in the ILO Platform Labor Convention

Introduction

Labor rights are the individual and collective rights that relate specifically to the role of being a worker, offering general protections in the context of the unequal power that characterizes hierarchical relations between workers and bosses¹. The emergence and growing popularity of digital labor platforms have created significant challenges to the realization of labor rights, because it breaks from and reframes the key reference for labor rights protections: the standard employment relationship. Digital labor platforms push the boundaries of existing institutional frameworks of employment with significant impact on workers' access to labor and social protections².

The Convention Concerning Decent Work in the Platform Economy and accompanying Recommendation, set to be voted on in June 2026, is an effort to address the legal and normative gaps in the existing international labor standards and support national initiatives to protect platform workers' rights³. This principles-based framework clarifies and reaffirms the applicability of the Fundamental Principles and Rights at Work and other existing labor standards to platform workers and addresses some of the core features of platforms.

This policy report aims to evaluate the extent to which the proposed Convention covers and addresses the labor issues faced by data workers, a significant parcel of platform

¹ Virginia Mantouvalou, 'Labor Rights', in *The Oxford Handbook of Economic and Social Rights*, ed. Malcolm Langford and Katharine Galloway Young, Oxford Handbooks Online Law (Oxford University Press, 2022), <https://doi.org/10.1093/oxfordhb/9780197550021.013.57>; Virginia Mantouvalou, 'Are Labour Rights Human Rights?', *European Labour Law Journal* 3, no. 2 (2012): 151–72, <https://doi.org/10.1177/201395251200300204>.

² Guillermo Gianibelli and International Labour Organization - Bureau for Workers' Activities, 'New Methods of Governance for Non-Standard Forms of Work', *International Journal of Labour Research* 9, nos 1–2 (2019): 123–43; Alex J. Wood et al., 'Networked but Commodified: The (Dis)Embeddedness of Digital Labour in the Gig Economy', *Sociology* 53, no. 5 (2019): 931–50, <https://doi.org/10.1177/0038038519828906>; Patrick Dieuaide and Christian Azaïs, 'Platforms of Work, Labour, and Employment Relationship: The Grey Zones of a Digital Governance', *Frontiers in Sociology* 5 (2020): 2, <https://doi.org/10.3389/fsoc.2020.00002>.

³ International Labour Organization, *Decent Work in the Platform Economy*, ILC.114/V(3) (International Labour Office, 2025); International Labour Organization, *Realizing Decent Work in the Platform Economy*, ILC.113/Report V(I) (International Labour Office, 2024), <https://www.ilo.org/resource/conference-paper/ilc/ilc114/realizing-decent-work-platform-economy-draft-convention-and-recommendation>.

workers. Data work is the human labor involved in the production of training data and maintenance of artificial intelligence models (AI). It encompasses the production, collection, cleaning, labelling and annotation of data, content moderation, output verification and model impersonation, flowing into all stages of AI development and deployment ⁴. It is often outsourced by technology companies to online labor platforms ⁵ and the globally dispersed, precarious workforce is largely hidden behind opaque socio-technical systems and imposed secrecy.

At this timely policy window, this report offers important insights for diverse stakeholders. For labor representatives and delegates involved in the negotiations at the International Labour Conference, the [policy recommendations](#) offer ambitious but concrete revisions to the draft Convention to improve its effectiveness in addressing the issues faced by platform data workers. For civil society groups or worker organizations less familiarized with data work, it provides a concise background and summary of the shared issues across the [platform economy](#) and [specificities of data work](#), succinctly bringing together findings from worker-led investigations in collaboration with [Data Workers' Inquiry](#), academic studies and journalistic accounts. The analysis of the [implications of the Platform Labour Convention](#) and recommendations highlight strategic policy hooks for strategic pressure both in the lead-up to the vote. Further, by identifying persistent gaps and flagging points where vagueness waters down effectiveness or provides potential leverage points, it highlights avenues for strategic partnerships and action beyond the negotiations of this year's International Labour Conference.

The analysis and recommendations provided in this report build on empirical research, most centrally the accounts, analyses and demands developed by data workers in collaboration with [Data Workers' Inquiry](#), a global participatory research project, supported by the Distributed AI Research Institute, the TU Berlin and the Weizenbaum Institute.

⁴ Paola Tubaro et al., 'The Trainer, the Verifier, the Imitator: Three Ways in Which Human Platform Workers Support Artificial Intelligence', *Big Data & Society* 7, no. 1 (2020): 2053951720919776, <https://doi.org/10.1177/2053951720919776>; Nuredin Ali Abdelkadir et al., 'The Role of Expertise in Effectively Moderating Harmful Social Media Content', ed. Naomi Yamashita et al. (ACM, 2025), 1–21, <https://doi.org/10.1145/3706598.3714010>.

⁵ Milagros Miceli and Julian Posada, 'The Data Production Dispositif', *Proceedings of the ACM on Human-Computer Interaction* 6 (November 2022): 37, <https://doi.org/10.1145/3555561>.

The Issues at Hand: Platform Labor and Data Work

Platform Work

Platform work is defined as task- or gig-based work that takes place through digitally mediated marketplaces or *platforms*. Platforms are digital infrastructures that mediate the interactions between workers and 'customers' (who can be businesses or individuals), offering the digital infrastructure for the coordination of an on-demand workforce ⁶.

An important distinction can be made between location and non-location based platform work. Deliveries or domestic services are examples where the services are provided in a specific location by individuals. In contrast, non-location based or online platforms intermediate services such as design or data annotation that are done remotely ⁷. Estimates on the number of platforms and platform workers indicate a significant and rapidly growing prevalence of this form of work. In 2023, the ILO identified 1070 platforms, 357 of which were online platforms ⁸. A study by the World Bank, focusing only on online platforms, estimates there are between 154 million and 435 million active workers in non-location based platforms, either as their principal or secondary occupation, meaning 4.4 to 12.5 percent of the global labor force ^{9,10}.

The erosion of the standard employment relationship

A central feature of labor platforms is the framing of work relationships in terms of service rather than employment. This framing ascribes platforms the role of technological intermediaries between independent parties, while workers are seen as entrepreneurs, and dependent work as self-employment with significant impact on access to labor and

⁶ Julieta Haidar and Maarten Keune, 'Introduction: Work and Labour Relations in Global Platform Capitalism', in *Work and Labour Relations in Global Platform Capitalism*, ed. Julieta Haidar and Maarten Keune (Edward Elgar Publishing, 2021); Namita Datta et al., *Working without Borders: The Promise and Peril of Online Gig Work*, (Washington, DC), ahead of print, 2023, <https://doi.org/10.1596/40066>; David Alzate, *The Effects of Regulating Platform-Based Work on Employment Outcomes: A Review of the Empirical Evidence*, no. 193830 (World Bank Group, 2024), <http://documents.worldbank.org/curated/en/099100124224513583>.

⁷ International Labour Organization, *Realizing Decent Work in the Platform Economy*; Alex J. Wood et al., 'Good Gig, Bad Gig: Autonomy and Algorithmic Control in the Global Gig Economy', *Work, Employment and Society* 33, no. 1 (2019): 56–75, <https://doi.org/10.1177/0950017018785616>.

⁸ International Labour Organization, *Realizing Decent Work in the Platform Economy*.

⁹ Datta et al., *Working without Borders: The Promise and Peril of Online Gig Work*.

¹⁰ The global survey in 17 countries conducted in 12 languages estimates that there could be about 132.5 million main, 173.7 million secondary, and 106.2 million marginal gig workers globally (Datta et al. 2023).

social protections ¹¹. This is a central topic of concern and raises the fundamental questions of if, and to what extent, platform workers are entitled to such protections.

Labor platforms push the boundaries of existing institutional frameworks and exist within legal “grey zones”, where workers are “neither completely independent nor completely subordinate” ¹². Given the centrality of formal employment relationships to labor legislation at both the national and international levels, the growing share of platform workers raises the increasingly pressing question of their bearing and applicability to these workers who are not formally employees. For this reason, misclassification of employment status remains central and is the object of many legal cases against platform providers ¹³.

Labor issues in platform work

Platforms also substantially change the processes and rhythm of labor. They allocate segmented and standardized assignments, breaking down labor processes into smaller units of execution or tasks ¹⁴. A task might be delivering a single pizza, the design of a logo, or labeling a series of images by identifying the presence of stop signs. Furthermore this fragmented and taskified work is managed by algorithmic systems that coordinate transactions, measure and quantify workers’ performance, aggregate data in the form of rating systems and allocate tasks and rates according to opaque measures ¹⁵. The costs and risks of work are shifted onto workers, and there is intensified pressure for workers to govern themselves according to market imperatives ¹⁶.

¹¹ Gianibelli and International Labour Organization - Bureau for Workers’ Activities, ‘New Methods of Governance for Non-Standard Forms of Work’; Wood et al., ‘Networked but Commodified: The (Dis)Embeddedness of Digital Labour in the Gig Economy’; Birgitta Bergvall-Kåreborn and Debra Howcroft, ‘Amazon Mechanical Turk and the Commodification of Labour’, *New Technology, Work and Employment* 29, no. 3 (2014): 213–23, <https://doi.org/10.1111/ntwe.12038>; International Labour Organization, *Realizing Decent Work in the Platform Economy*.

¹² Dieuaide and Azaïs, ‘Platforms of Work, Labour, and Employment Relationship: The Grey Zones of a Digital Governance’.

¹³ Dieuaide and Azaïs, ‘Platforms of Work, Labour, and Employment Relationship: The Grey Zones of a Digital Governance’.

¹⁴ Antonio A. Casilli and Julian Posada, ‘The Platformization of Labor and Society’, in *Society and the Internet. How Networks of Information and Communication Are Changing Our Lives*, 2nd edn, ed. Mark Graham and William H. Dutton (Oxford University Press, 2019), <https://doi.org/10.1093/oso/9780198843498.003.0018>; Christine Gerber, ‘Alte Herrschaft indigitalen Gewändern? - Der Arbeitsprozess auf CrowdWorking Plattformen’, in *Marx und die Roboter: vernetzte Produktion, Künstliche Intelligenz und lebendige Arbeit*, 2. Auflage, ed. Florian Butollo and Sabine Nuss, Analysen (Dietz, 2019).

¹⁵ Alessandro Gandini, ‘Labour Process Theory and the Gig Economy’, *Human Relations* 72, no. 6 (2019): 1039–56, <https://doi.org/10.1177/0018726718790002>; International Labour Organization, *World Employment and Social Outlook 2021: The Role of Digital Labour Platforms in Transforming the World of Work*, (Geneva) 2021 (2021): 282.

¹⁶ Janine Berg et al., *Digital Labour Platforms and the Future of Work: Towards Decent Work in the Online World*, with Internationale Arbeitsorganisation (International Labour Organization, 2018); Ricardo L. C. Antunes, *Uberização, trabalho digital e indústria 4.0*, Mundo do trabalho (Boitempo, 2022); Wood et al., ‘Good Gig, Bad Gig: Autonomy and Algorithmic Control in the Global Gig Economy’.

The concrete consequences of this organizational model for workers are intensified labor precarity, highly competitive environments and commodification¹⁷. A constant oversupply of labor fosters increased competitiveness and a deterioration of average hourly earnings, since a significant portion of work-related activities and time goes unpaid, including the downtime of waiting and searching for tasks across platforms, any qualification or training required for a task and recovery periods during the work day¹⁸. This raises significant legal questions regarding wages and the related question of what counts as compensable time: is it only time spent on tasks, the time necessary to prepare and complete tasks, or all time spent online¹⁹?

Data Work

Data work is the human labor involved in data production and model maintenance for artificial intelligence systems²⁰. The tasks performed by data workers broadly comprise infusing data with structure and meaning, making it interpretable for computers²¹. Data work flows directly into the development of automation technologies, from large language models to self-driving cars. During the initial training of such systems, data workers produce and collect texts, images and videos; they clean, label and annotate data; and they moderate content²². Beyond this preparation phase, data workers are engaged to perform quality checks and verify outputs to optimize or re-train systems, sometimes also supplementing these systems when they fail by seamlessly stepping in to impersonate them²³.

Crucially, data work is outsourced by technology companies, often to online labor platforms²⁴. Platforms such as Amazon Mechanical Turk, which has been active since 2005, Appen, Microworkers and Remotasks, (recently renamed to Outlier AI), are some

¹⁷ Wood et al., 'Networked but Commodified: The (Dis)Embeddedness of Digital Labour in the Gig Economy'; Matheus Viana Braz et al., 'Turkerização e Gestão Algorítmica Do Trabalho Em Plataformas de Microtarefas', *Conversas Em Psicologia* 1 (June 2021): 01–16, <https://doi.org/10.33872/conversaspsico.v1n1.turkerizacao>.

¹⁸ Wood et al., 'Networked but Commodified: The (Dis)Embeddedness of Digital Labour in the Gig Economy'.

¹⁹ Veena Dubal, *The Legal Uncertainties of Gig Work* (2024), <https://doi.org/10.1093/oxfordhb/9780192870360.013.61>.

²⁰ Miceli and Posada, 'The Data Production Dispositif'; Tubaro et al., 'The Trainer, the Verifier, the Imitator'.

²¹ Miceli and Posada, 'The Data Production Dispositif'; Milagros Miceli et al., 'Between Subjectivity and Imposition: Power Dynamics in Data Annotation for Computer Vision', *Proc. ACM Hum.-Comput. Interact.* 4, no. CSCW2 (2020): 115:1–115:25, <https://doi.org/10.1145/3415186>.

²² Tubaro et al., 'The Trainer, the Verifier, the Imitator'; Nuredin Ali Abdelkadir et al., 'The Role of Expertise in Effectively Moderating Harmful Social Media Content', *Proceedings of the 2025 CHI Conference on Human Factors in Computing Systems* (New York, NY, USA), CHI '25, 25 April 2025, 1–21, <https://doi.org/10.1145/3706598.3714010>.

²³ Tubaro et al., 'The Trainer, the Verifier, the Imitator'; Michael Geoffrey Asia, 'The Emotional Labor Behind AI Intimacy', in *Data Workers' Inquiry* (2026), <https://data-workers.org/michael/>.

²⁴ Miceli and Posada, 'The Data Production Dispositif'; James Muldoon et al., 'A Typology of Artificial Intelligence Data Work', *Big Data & Society* 11, no. 1 (2024), <https://doi.org/10.1177/20539517241232632>.

examples of platforms that mediate AI-related tasks. Despite widespread narratives about AI making human labor redundant ²⁵, data work is unlikely to be made redundant. AI requires constant human input and oversight throughout its pipeline to keep datasets updated in dynamic and complex deployment contexts ²⁶. Further, economic factors like the availability of cheap labor and the market-driven demand for new and better data underpin the continued reliance on human labor ²⁷. Data work is structurally necessary to artificial intelligence ²⁸, underscoring the persistent relevance of labor protections in this industry.

There are many challenges to quantifying the number of data workers engaged through platforms, which are exacerbated by the secrecy that characterizes AI supply chains ²⁹. Nevertheless, data work represents an important fraction of online platform tasks. Adopting the classification used by the World Bank for their report, data work spans many categories, including most “online microtasks”, as well as work that would fall under “writing and translation” and “data entry, administrative and clerical tasks”, two categories that also encompass data production, labeling, verification and curation. Accordingly, we can roughly estimate that about 25% of the platforms intermediate data work, and about 25% of the traffic in online labor platforms is data work. Estimates place this sector’s revenue at USD 10.2 billion by 2034, with almost 500 companies presently active in AI data collection and labeling (Silva 2026).

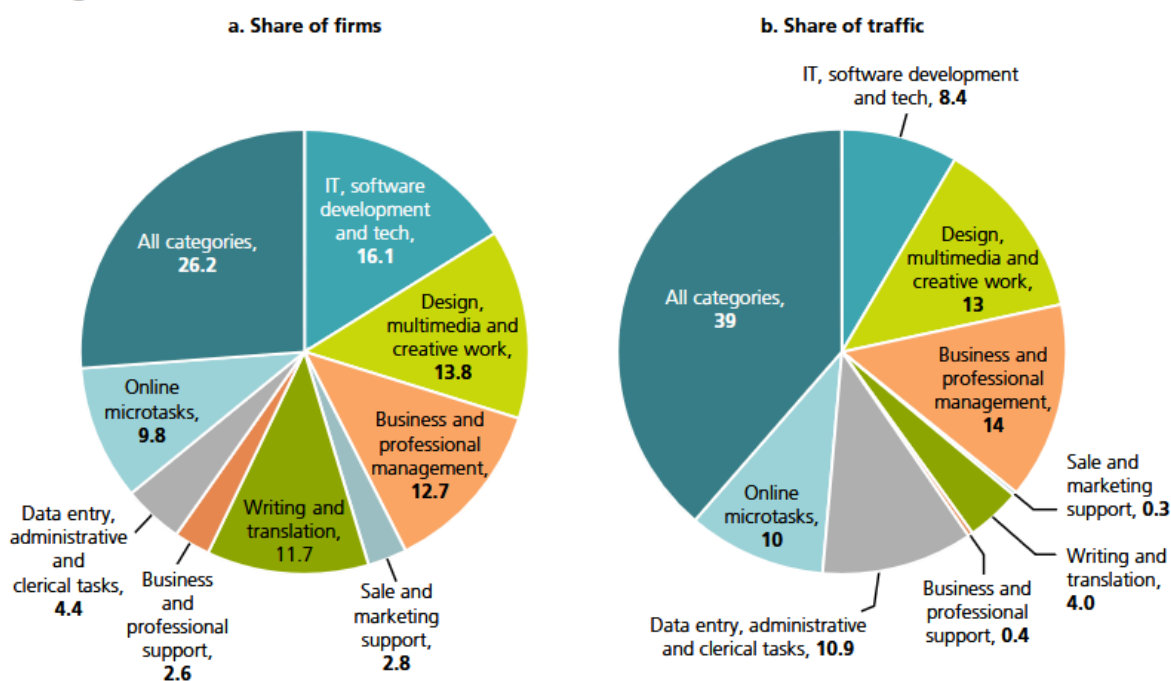
²⁵ Emily M. Bender and Alex Hanna, *The AI Con*, First edition (HarperCollins, 2025).

²⁶ Clément Le Ludec et al., ‘The Problem with Annotation. Human Labour and Outsourcing between France and Madagascar’, *Big Data & Society* 10, no. 2 (2023): 20539517231188723, <https://doi.org/10.1177/20539517231188723>; Amandalynne Paullada et al., ‘Data and Its (Dis)Contents: A Survey of Dataset Development and Use in Machine Learning Research’, *Patterns* 2, no. 11 (2021): 100336, <https://doi.org/10.1016/j.patter.2021.100336>.

²⁷ Hamid Ekbia and Bonnie Nardi, ‘Heteromation and Its (Dis)Contents: The Invisible Division of Labor between Humans and Machines’, *First Monday*, ahead of print, 2014, <https://doi.org/10.5210/fm.v19i6.5331>; Tubaro et al., ‘The Trainer, the Verifier, the Imitator’; James Muldoon et al., *Feeding the Machine: The Hidden Human Labor Powering A.I* (Canongate Books, 2024); Mary L. Gray and Siddharth Suri, *Ghost Work: How to Stop Silicon Valley from Building a New Global Underclass*, International edition (Houghton Mifflin Harcourt, 2019).

²⁸ Tubaro et al., ‘The Trainer, the Verifier, the Imitator’.

²⁹ Paola Tubaro et al., ‘Counting “Micro-Workers”: Societal and Methodological Challenges around New Forms of Labour’, *Work Organisation, Labour & Globalisation* 14, no. 1 (2020), <https://doi.org/10.13169/workorgalaboglob.14.1.0067>; Margarida Silva, ‘Big Tech Sets Unfair Terms and Conditions for AI Data Workers Globally’, *SOMO*, 31 March 2026, <https://www.somo.nl/big-tech-sets-unfair-terms-and-conditions-for-ai-data-workers-globally/>; Tatiana Dias, ‘Data Work Is Too Secretive. Big Tech Should Be Held Accountable’, *TechPolicy.Press*, 15 April 2026, <https://www.techpolicy.press/data-work-is-too-secretive-big-tech-should-be-held-accountable/>.

FIGURE 1.7: Proportions of global and regional/local platforms that offer task categories, %

Source: Study team database.

Note: IT = information technology.

Figure from the World Bank report on digital platform work. The charts break down the types of tasks offered to workers on platforms: (a) illustrates the proportion of platforms that offer a type of task, and (b) the share of internet traffic that goes to platforms offering a task type. Both measures can be used as proxies for the amount of work being contracted. (Source: Datta et al. 2023)

Data workers, journalists and academics have time and again denounced the exploitative nature of this industry: pervasive precarity, low payments, wage theft, disregard for the detrimental consequences of the work to workers' mental health and exploitative management strategies are abundantly documented³⁰. To summarize the key issues faced

³⁰ Billy Perrigo, 'The \$2 Per Hour Workers Who Made ChatGPT Safer', *TIME*, 18 January 2023, <https://time.com/6247678/openai-chatgpt-kenya-workers/>; Karen Hao, *Empire of AI: Dreams and Nightmares in Sam Altman's OpenAI* (Penguin Press, 2025); Paola Tubaro et al., 'Where Does AI Come from? A Global Case Study across Europe, Africa, and Latin America', *New Political Economy* 30, no. 3 (2025): 359–72, <https://doi.org/10.1080/13563467.2025.2462137>; Shivani Kapania et al., "'The Plan Is Just Survival': Data Work in Kenya and the Regime of Entrapment", *Proceedings of the 2026 CHI Conference on Human Factors in Computing Systems* (New York, NY, USA), CHI '26, 13 April 2026, 1–17, <https://doi.org/10.1145/3772318.3791097>; Nuredin Ali Abdelkadir et al., 'Beyond Content Exposure: Systemic Factors Driving Moderators' Mental Health Crisis in Africa', *Proceedings of the 2026 CHI Conference on Human Factors in Computing Systems* (New York, NY, USA), CHI '26, 13 April 2026, 1–18, <https://doi.org/10.1145/3772318.3791639>; Olivia Solon, 'Facebook Is Hiring Moderators. But Is the Job Too Gruesome to Handle?', *Technology*, *The Guardian*, 4 May 2017,

by platform data workers, this report draws strongly on the findings of the research project [Data Workers' Inquiry](#). In this radically participatory research initiative, spanning 13 countries across five continents, data workers themselves lead research inquiries into their workplaces, identifying urgent issues, formulating their own questions and articulating demands in pieces that best suit their goals. While this policy report focuses on the problems and challenges identified by data workers who are engaged through platforms, the findings of the Data Workers' Inquiry project consistently show that data workers share many experiences irrespective of the legal classification of their work relationship, both regarding the structural features of the AI labor supply chain and the nature of the work itself.

Platform data work shares the broad issues of platform work

Data workers contracted by labor platforms face the challenges characteristic of this arrangement: the unpredictable workload of task-based work paid by piece, significant unpaid time, opaque decision structures from algorithmic decisions to the unilaterally set terms and conditions, and exclusion from most labor protections.

Platform data workers are officially classified as independent contractors and excluded from labor protections, including social security and layoff protections. The terms and conditions of platforms are unilaterally determined and any violation of the terms by the workers may be punished with account suspensions³¹. Opaque algorithmic systems are employed to manage decisions about task rates, distribution and rejections, as well as regarding the suspension of accounts³² and workers do not receive any explanations for such decisions, which often seem arbitrary³³. Workers engaged at Appen, for instance, receive automated messages to “not pester [the platform] with questions” during waiting times³⁴. This lack of transparency also concerns the personal data rights of workers, who are often required to install tracking software under the premise of productivity but

<https://www.theguardian.com/technology/2017/may/04/facebook-content-moderators-ptsd-psychological-dangers>.

³¹ Alexis Chávez, 'Impact of Gift Card Payments on MTurk Workers', in *Data Workers' Inquiry*, ed. Milagros Miceli et al. (2024), <https://data-workers.org/alex>; Ruba, 'IA Artificial', in *Data Workers' Inquiry*, ed. Milagros Miceli et al. (2024), <https://data-workers.org/ruba>.

³² Gray and Suri, *Ghost Work: How to Stop Silicon Valley from Building a New Global Underclass*.

³³ Mophat Okinyi, 'Impact of Remotasks Closure on Kenyan Workers', in *Data Workers' Inquiry*, ed. Milagros Miceli et al. (2024), <https://data-workers.org/mophat>; Oskarina Fuentes, 'Life of a Latin American Data Worker', in *Data Workers' Inquiry*, ed. Milagros Miceli et al. (2024), <https://data-workers.org/oskarina>; Viana Braz et al., 'Turkerização e Gestão Algorítmica Do Trabalho Em Plataformas de Microtarefas'; Ruba, 'IA Artificial'; Chávez, 'Impact of Gift Card Payments on MTurk Workers'; Rafael Grohmann et al., 'O chão de fábrica (brasileiro) da inteligência artificial: a produção de dados e o papel da comunicação entre trabalhadores de Appen e Lionbridge', *Palavra Chave* 24, no. 3 (2021), <https://doi.org/10.5294/pacla.2021.24.3.8>.

³⁴ Ruba, 'IA Artificial'.

receive no information regarding what data is collected or how it is processed, stored and used³⁵.

Importantly, many of the problems with platforms are not only present, but also exacerbated in non-location-based platforms or in data work specifically. The taskification of work is particularly intense in data work, as each data point becomes a task with workers' interpretative work condensed into a single click³⁶. Given that data workers must still dedicate significant time to read and understand instructions and training materials to fulfill strict quality criteria³⁷, the percentage of work time that goes uncompensated is larger³⁸. And the role of algorithmic management is also much more direct, as data workers' outputs are frequently vetted automatically through test tasks or through cross-comparison of outlying responses, such that workers are subordinated to machine judgments³⁹. It is a system that treats them as "work tools that they can discard [rather than] as human beings who help them"⁴⁰. The externalization of the responsibility for training and adaptation to platforms' demands to data workers has created an audience for content creators offering tutorials and tips to data workers trying to navigate such opaque systems⁴¹.

While labor platforms in general profit from the lower labor rights standards of contracted workers in comparison to employees, non-location based platforms also profit from regulatory gaps across labor geographies, exploiting legal and political-economic conditions⁴². Competition and the fostering of high work intensity operate at a global

³⁵ Joan Kingua, 'Invisible Hands, Visible Futures: The Rise of Africa's Data Worker Movement in the Age of AI', Substack newsletter, *DataSyn*, 6 May 2026, https://datasyn.substack.com/p/invisible-hands-visible-futures-the?utm_medium=web.

³⁶ Oscar Schwartz, 'Untold History of AI: How Amazon's Mechanical Turkers Got Squeezed Inside the Machine', *IEEE Spectrum*, 22 April 2019, <https://spectrum.ieee.org/untold-history-of-ai-mechanical-turk-revisited-tkkt>; Bergvall-Kåreborn and Howcroft, 'Amazon Mechanical Turk and the Commodification of Labour'.

³⁷ Yasser Alrayes, 'Annotate to Educate: The Dual Life of a Syrian Student & Data Annotator', in *Data Workers' Inquiry*, ed. Milagros Miceli et al. (2024), <https://data-workers.org/yasser>.

³⁸ Fuentes, 'Life of a Latin American Data Worker'; Ruba, 'IA Artificial'; Berg et al., *Digital Labour Platforms and the Future of Work*.

³⁹ Lilly Irani and M. Six Silberman, 'Turkopticon: Interrupting Worker Invisibility in Amazon Mechanical Turk', ed. Wendy E. Mackay, ACM Conferences (ACM, 2013), 611–20, <https://doi.org/10.1145/2470654.2470742>; Clara and B, 'Behind The Face of AI', in *Data Workers' Inquiry* (2026), <https://data-workers.org/france/>.

⁴⁰ Fuentes, 'Life of a Latin American Data Worker'.

⁴¹ Julice Salvagni and Rafael Grohmann, 'Data Work for Beginners: Neoliberal Pedagogies and the Circulation of Platform Labor', *Journal of Sociology*, 23 April 2026, 14407833261425835, <https://doi.org/10.1177/14407833261425835>.

⁴² Tubaro et al., 'Where Does AI Come from? A Global Case Study across Europe, Africa, and Latin America'; Julian Posada, 'The Coloniality of Data Work' (Doctoral Dissertation, University of Toronto, 2022), <http://hdl.handle.net/1807/126388>; Kapania et al., "'The Plan Is Just Survival'".

scale ⁴³. These dynamics mirror those of more traditional labor outsourcing: production is contracted to another country, specifically countries with high unemployment and/or a lower capacity to regulate and enforce labor legislation, thereby creating intricate networks of relationships and incentives that ultimately harm workers ⁴⁴. Thus, the exploitation of platform data workers is based on their geographic and economic background, as well as their status as contractors; “[p]recarity emerges as both the precondition for, and the outcome of, companies’ exploitation of data workers” ⁴⁵.

Platform data work presents unique challenges

Beyond the challenges that the institutional form of platforms create, platform data workers also encounter problems specifically related to the nature of their work and industry.

1. Structural wage theft

In addition to the aforementioned wage theft through unpaid time, task rejections and trainings are a form of wage theft in themselves ⁴⁶. Any work that is not considered valid will not be paid, so workers either accept earnings loss or need to redo work ⁴⁷. Furthermore, in practice, clients are usually able to work with the data even if they reject the task; the terms of the platform Amazon Mechanical Turk, for example, explicitly state that rejected work remains the legal property of requesters ⁴⁸. Similarly, data workers report being offered never-ending training tasks that are not paid and whose accuracy does not ensure access to paid work. Workers engaged at Appen, for instance, receive automated messages to “not pester [the platform] with questions” during waiting times between qualification and assignment to a project ⁴⁹. Algorithmic management plays a

⁴³ Wood et al., ‘Networked but Commodified: The (Dis)Embeddedness of Digital Labour in the Gig Economy’; Florian A. Schmidt, ‘The Planetary Stacking Order of Multilayered Crowd-AI Systems’, in *Digital Work in the Planetary Market*, ed. Mark Graham and Fabian Ferrari (The MIT Press, 2022), <https://doi.org/10.7551/mitpress/13835.003.0012>; Rafael Grohmann et al., ‘Click Farm Platforms: An Updating of Informal Work in Brazil and Colombia’, *Work Organisation, Labour & Globalisation* 16 (January 2022), <https://doi.org/10.13169/workorglaboglob.16.2.0007>.

⁴⁴ Anna Salmivaara, ‘New Governance of Labour Rights: The Perspective of Cambodian Garment Workers’ Struggles’, *Globalizations* 15, no. 3 (2018): 329–46, <https://doi.org/10.1080/14747731.2017.1394069>; David Weil, *The Fissured Workplace* (Harvard University Press, 2014), <https://doi.org/10.4159/9780674726123>.

⁴⁵ Kapania et al., “‘The Plan Is Just Survival’”.

⁴⁶ Ruba, ‘IA Artificial’; Berg et al., *Digital Labour Platforms and the Future of Work*; Brian McInnis et al., ‘Taking a HIT: Designing around Rejection, Mistrust, Risk, and Workers’ Experiences in Amazon Mechanical Turk’, *Proceedings of the 2016 CHI Conference on Human Factors in Computing Systems* (New York, NY, USA), CHI ‘16, 7 May 2016, 2271–82, <https://doi.org/10.1145/2858036.2858539>.

⁴⁷ Ruba, ‘IA Artificial’; Alrayes, ‘Annotate to Educate: The Dual Life of a Syrian Student & Data Annotator’; Roukaya al-Hammada, “‘If I Had Another Job, I Would Not Accept Data Annotation Tasks’”: How Syrian Refugees in Lebanon Train AI’, in *Data Workers’ Inquiry*, ed. Milagros Miceli et al. (2024), <https://data-workers.org/Roukaya>.

⁴⁸ McInnis et al., ‘Taking a HIT’.

⁴⁹ Ruba, ‘IA Artificial’.

central role in this; the opaque decision criteria, coupled with the nonexistent or unresponsive communication channels, enable wage theft without recourse for workers. Errors in the system as well as discrepancies between task instructions and the criteria programmed into the system, play out to the detriment of workers, who suffer financial consequences for low accuracy rates ⁵⁰.

Additionally, we find some more unique forms of wage theft. The 2024 closure of the platform Remotasks in Kenya resulted in all accounts in the country being simultaneously and immediately suspended, creating large-scale wage theft through loss of access to earnings ⁵¹. During Remotasks' closure, many workers lost earnings because of the minimal threshold for withdrawals, but for many platforms, i.e. HiveMicro, this threshold is set so high that a majority of workers earning less than a cent per task will never meet them and just leave the earnings to the platform after realizing the predatory nature of this arrangement. On the platform Amazon Mechanical Turk structural wage theft occurs through the payment of earnings in the form of Amazon gift cards, which cannot be used to pay for basic needs and force "workers [to] look for ways to transform their earnings into useful money at the expense of losing a significant percentage" ⁵².

2. Lack of recognition and prospects

Data workers' contributions are systematically hidden and AI companies and platforms push narratives of data workers as low-skilled. In stark contrast to such narratives, data workers must frequently complete a number of tests and qualifications to access work, including cognitive tests, English proficiency, Excel or other technical assessments, and/or qualifications tailored to the specific work to be completed ⁵³. A key complaint from data workers is the lack of recognition of the skill and expertise necessary to balance extensive, ever-changing instructions and complex cultural contexts, while maintaining constant focus and high precision across a wide range of techniques ⁵⁴. This also expresses itself in the low quality of training materials, task instructions and codebooks, causing significant loss of income for platform workers ⁵⁵. Long and unclear materials can result in much time

⁵⁰ Ben Zefeng Zhang et al., 'The Making of Performative Accuracy in AI Training: Precision Labor and Its Consequences', *Proceedings of the 2025 CHI Conference on Human Factors in Computing Systems*, 26 April 2025, 1–19, <https://doi.org/10.1145/3706598.3713112>.

⁵¹ Okinyi, 'Impact of Remotasks Closure on Kenyan Workers'; Brian Nzomo, 'Online Gig Workers Left Stranded as Remotasks Exits Kenya', Kenya Business News, *The Kenyan Wallstreet*, 13 March 2024, <https://kenyanwallstreet.com/gig-workers-stranded-as-remotasks-exits-kenya>.

⁵² Chávez, 'Impact of Gift Card Payments on MTurk Workers'.

⁵³ Ruba, 'IA Artificial'.

⁵⁴ Okinyi, 'Impact of Remotasks Closure on Kenyan Workers'; al-Hammada, "'If I Had Another Job, I Would Not Accept Data Annotation Tasks": How Syrian Refugees in Lebanon Train AI'; Clara and B, 'Behind The Face of AI'.

⁵⁵ McInnis et al., 'Taking a HIT'.

lost by the workers⁵⁶, rejections, and double work⁵⁷. Some tasks come with no instructions, creating a “guessing game as to what the client wants”⁵⁸ and there is, generally, very little preparation provided for workers⁵⁹.

Data workers must tackle the messy, ambiguous and uncertain aspects of technology production and data interpretation, while conforming to imposed and arbitrary accuracy standards of this “precision labor”⁶⁰. Workers “often need to invest excessive time and effort to engage in precision labor to secure their wages, as failing to meet accuracy standards carries significant financial consequences” but this effort is both hidden and unpaid⁶¹. Although it is possible to build a reputation on the platforms to access better-paying jobs⁶², the skills and experience workers develop over time do not translate into career prospects. They are still subject to arbitrary dismissal which in practice means “losing past work history—like losing your resume—along with qualifications and relationships with requesters”⁶³ and can’t reliably progress professionally. Indeed, data workers’ professional experience, with individual tasks consisting of only a few clicks, does not conform with usual patterns outside the AI industry, making it hard to document in résumés, CVs and professional profiles and undermining professional progression⁶⁴. Moreover, as AI systems and consequently the task-specific skills required of data workers evolve to require more specialized, technical expertise, AI companies and intermediaries fail to provide the necessary investment in upskilling and professional development⁶⁵. This compresses wages, increases the competition and keeps workers in continuous precarity.

3. Concealment, NDAs and union busting

The data work industry is also characterized by distinctive patterns of worker concealment. The role of human labor in AI development and use remains hidden behind the socio-technical systems of platforms⁶⁶. This concealment is enforced through widespread and strict non-disclosure agreements (NDAs), which contractually prohibit most data workers from disclosing details about the data that they process and the

⁵⁶ Alrayes, ‘Annotate to Educate: The Dual Life of a Syrian Student & Data Annotator’.

⁵⁷ al-Hammada, ‘“If I Had Another Job, I Would Not Accept Data Annotation Tasks”: How Syrian Refugees in Lebanon Train AI’.

⁵⁸ Fuentes, ‘Life of a Latin American Data Worker’.

⁵⁹ Okinyi, ‘Impact of Remotasks Closure on Kenyan Workers’.

⁶⁰ Zhang et al., ‘The Making of Performative Accuracy in AI Training’.

⁶¹ Zhang et al., ‘The Making of Performative Accuracy in AI Training’.

⁶² Fuentes, ‘Life of a Latin American Data Worker’.

⁶³ Chávez, ‘Impact of Gift Card Payments on MTurk Workers’.

⁶⁴ Lais et al., ‘From Data Workers to Data Workers – Precarious Working Conditions in Content Moderation and Their Consequences for Workers’, in *Data Workers’ Inquiry*, ed. Milagros Miceli et al. (2024), <https://data-workers.org/essen>.

⁶⁵ Kinyua, ‘Invisible Hands, Visible Futures’.

⁶⁶ Gray and Suri, *Ghost Work: How to Stop Silicon Valley from Building a New Global Underclass*, Muldoon et al., *Feeding the Machine: The Hidden Human Labor Powering A.I.*

identity of the clients, with some more extensive agreements prohibiting them from even disclosing their association to the platform ⁶⁷.

The widespread use of non-disclosure agreements not only hides workers contributions to AI development, it restricts unionization and collective organization efforts ⁶⁸. It imposes heavy risks and penalties on workers who speak up: “in some cases, these agreements also discourage or explicitly prohibit workers from engaging with labor organizations” ⁶⁹. They can have their accounts suspended for as little as participating in peer groups on social media ⁷⁰. This creates significant barriers to any organizing efforts beyond an individual company. If workers can’t talk about their job privately, much less publicly, that means they can only find one another within the confines of the internal chat tools of the platform that contracts them. These intrusive and pervasive NDAs operate in combination with the structural concealment of data work and more traditional union-busting practices, such as intimidation and blacklisting of active organizers from any future opportunities regardless of their previous work history and skills to hinder workers’ resistance.

4. Mental health

Within the diverse range of tasks and materials that data workers analyze, they are often paid to evaluate, annotate or moderate violent, graphic, emotionally draining and/or otherwise traumatizing materials ⁷¹. Together with the highly competitive, secretive and isolating nature of the work, the kind of content they work with creates significant psycho-social risks to workers' mental health ⁷². The long-lasting effects of such trauma are diverse, severe PTSD, anxiety, depression and insomnia have been documented, as well as emotional deregulation—both as desensitization and as heightened emotional reactivity— and compulsive or otherwise disrupted emotional, sexual and social

⁶⁷ Ruba, 'IA Artificial'; Asia, 'The Emotional Labor Behind AI Intimacy'; Clara and B, 'Behind The Face of AI'.

⁶⁸ Kapania et al, "The Plan Is Just Survival".

⁶⁹ Kinyua, 'Invisible Hands, Visible Futures'.

⁷⁰ Dias, 'Data Work Is Too Secretive. Big Tech Should Be Held Accountable'.

⁷¹ Kauna Malgwi, 'A Mental Health Intervention for Data Workers', in *Data Workers' Inquiry*, ed. Milagros Miceli et al. (2025), <https://data-workers.org/kauna>; Asia, 'The Emotional Labor Behind AI Intimacy'; Abdelkadir et al., 'The Role of Expertise in Effectively Moderating Harmful Social Media Content'; Adrian Chen, 'The Laborers Who Keep Dick Pics and Beheadings Out of Your Facebook Feed', Tags, *Wired*, 23 October 2014, <https://www.wired.com/2014/10/content-moderation/>.

⁷² Malgwi, 'A Mental Health Intervention for Data Workers'; Viana Braz et al., 'Turkerização e Gestão Algorítmica Do Trabalho Em Plataformas de Microtarefas'; Solon, 'Facebook Is Hiring Moderators. But Is the Job Too Gruesome to Handle?'; Sarah T. Roberts, *Behind the Screen: Content Moderation in the Shadows of Social Media* (Yale University Press, 2019); Ben Wray, 'Content Moderation Is What a 21st Century Hazardous Job Looks Like', *HesaMag*, December 2024.

interactions ⁷³. This issue is most prominent in content moderation, a form of data work frequently present in business process outsourcing companies, but data workers engaged in platforms also encounter tasks that expose them to sensitive or traumatizing materials ⁷⁴. In most cases, these projects or tasks do not have any specific training, warning or support ⁷⁵, and this occupational hazard remains neglected by most legislation. Given the lack of mental health protections, workers ultimately develop unhealthy coping mechanisms, and severe, long-lasting trauma has been documented ⁷⁶.

Further, the pressure of extremely high-accuracy requirements and arbitrary standards has strong alienating effects. Data workers often refer to the metaphor of robots to describe their roles ⁷⁷ and are occasionally specifically instructed to mimic machine outputs as much as possible to ensure high accuracy rates ⁷⁸. While there have been a number of lawsuits related to PTSD, and other forms of long-lasting psychological harms to content moderators, these are still ongoing or have been settled out of court, such that they do not create legal precedents for subsequent cases ⁷⁹, underscoring the need for regulations to address this issue.

⁷³ Malgwi, 'A Mental Health Intervention for Data Workers'; Fasica Berhane Gebrekidan, 'Content Moderation: The Harrowing, Traumatizing Job That Left Many African Data Workers with Mental Health Issues and Drug Dependency', in *Data Workers' Inquiry*, ed. Milagros Miceli et al. (2024), <https://data-workers.org/fasica>; Robert Booth, 'More than 140 Kenya Facebook Moderators Diagnosed with Severe PTSD', Media, *The Guardian*, 18 December 2024,

<https://www.theguardian.com/media/2024/dec/18/kenya-facebook-moderators-sue-after-diagnoses-of-severe-ptsd>; Botlhokwa Nondali Ditshepo Ranta, 'The Unknown Women of Content Moderation', in *Data Workers' Inquiry*, ed. Milagros Miceli et al. (2024), <https://data-workers.org/ranta>.

⁷⁴ Okinyi, 'Impact of Remotasks Closure on Kenyan Workers'.

⁷⁵ Okinyi, 'Impact of Remotasks Closure on Kenyan Workers'.

⁷⁶ Berhane Gebrekidan, 'Content Moderation: The Harrowing, Traumatizing Job That Left Many African Data Workers with Mental Health Issues and Drug Dependency'; Ranta, 'The Unknown Women of Content Moderation'; Abdelkadir et al., 'Beyond Content Exposure'; Roberts, *Behind the Screen*.

⁷⁷ Fuentes, 'Life of a Latin American Data Worker'; Lais et al., 'From Data Workers to Data Workers – Precarious Working Conditions in Content Moderation and Their Consequences for Workers'.

⁷⁸ Clara and B, 'Behind The Face of AI'; Zhang et al., 'The Making of Performative Accuracy in AI Training'; Berhane Gebrekidan, 'Content Moderation: The Harrowing, Traumatizing Job That Left Many African Data Workers with Mental Health Issues and Drug Dependency'.

⁷⁹ Wray, 'Content Moderation Is What a 21st Century Hazardous Job Looks Like'; Daniel Wiessner, 'YouTube Settles Moderators' Case over Graphic Videos for \$4.3 Mln', Transactional, *Reuters*, 13 July 2022, <https://www.reuters.com/legal/transactional/youtube-settles-moderators-case-over-graphic-videos-43-mln-2022-07-13/>; Kari Paul, 'Facebook to Pay \$52m for Failing to Protect Moderators from "horrors" of Graphic Content', Technology, *The Guardian*, 13 May 2020, <https://www.theguardian.com/technology/2020/may/12/facebook-settlement-mental-health-moderators>; Booth, 'More than 140 Kenya Facebook Moderators Diagnosed with Severe PTSD'.

The Proposed Platform Labour Convention

The International Labour Organization (ILO) is an autonomous organization with a tripartite structure, where governments, labor and employer organizations are represented, and a mandate to address unjust labor conditions and promote social justice through labor standards. Guided by the key tenet that “labor is not a commodity”, international labor standards play an essential role in promoting decent and productive work, in conditions of freedom, equity, security and dignity ⁸⁰.

The expanding influence and cross-border reach of labor platforms, the growing dissatisfaction and collective organization of platform workers and concerns over the normative gaps and challenges introduced by this institutional form motivated the effort to develop an international Convention concerning platform labor ⁸¹. During the 113th International Labour Conference in June 2025, representatives agreed on a draft of the Platform Convention supplemented by a non-binding Recommendation that provides more detailed guidelines, set to be voted on in 2026.

The current draft encompasses 24 Articles across the International Labour Organization’s key priorities for decent work and takes a “principles-based” approach, leaning strongly towards universal and broad principles rather than precise rules. Centrally, it aims to address applicability gaps in ensuring legal protection for workers engaged in informal, self-employed and other non-standard arrangements ⁸². It specifically includes platform workers irrespective of their self-employed or employed status and directly clarifies and reaffirms the applicability of existing labor standards to platform workers, in particular the protections set out in the Declaration on Fundamental Principles and Rights at Work (1998). It also calls on member states to take measures to respect, promote and realize these rights in the platform economy (Article 3, 4). Additionally, it addresses some of the core features of platform work, including the terms of engagement or employment, remuneration, the suspension or deactivation of accounts, the question of jurisdiction, as well as the technical functioning of platforms.

The draft Convention mandates transparent documentation of the terms of engagement or employment (Article 17), which shall be subject to the laws and regulations of the country where the work is performed (Article 18). Session VIII addresses common

⁸⁰ Mantouvalou, ‘Labor Rights’; International Labour Organization.

⁸¹ International Labour Organization, *Realizing Decent Work in the Platform Economy*.

⁸² International Labour Organization, *Non-Standard Employment around the World* (International Labour Office, 2016), https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40dgreports/%40dcomm/%40publ/documents/publication/wcms_534326.pdf.

problems workers encounter regarding their payments and remuneration, introducing requirements that members ensure payments are “paid in full, on time and in legal tender” (Article 9, §1), that they are not lower than the statutory minimum wage, if applicable (Article 9, §2(a)), and that platforms regularly provide “accurate and easily understandable information on [workers’] remuneration or payment and any deductions made” (Article 10). Additionally, the suspension or deactivation of accounts or the termination of employment or engagement “based on discriminatory or otherwise unjustified grounds” is explicitly prohibited (Article 16).

Furthermore, there is a clear focus on the technologically-mediated nature of this work. Indeed, the definition of “digital labor platforms” specifically includes the use of “automated decision-making systems” (Article 1). Article 15 requires safeguards concerning the extent and processing of workers’ personal data, and session X sets transparency and explainability requirements for the use of automated systems to monitor or evaluate work, or to generate decisions. The use of such tools must be disclosed to workers before their employment or engagement, as must the extent of these systems’ impact on workers or their access to work (Article 12). Where decisions are generated by automated systems, digital platform workers and their representatives must have access:

“[...] on request, without unreasonable delay, to:

(a) a written explanation for decisions that impact their working conditions or access to work;

(b) a human review of decisions that result in the non-disbursement of any amount due to digital platform workers, or the suspension or deactivation of their account, or the termination of their employment or engagement with a digital labour platform” (Article 14)

Implications of the Platform Labour Convention for Platform Data Workers

International labor standards are a universal point of reference, acting as an essential resource in the denunciation of inequalities and the regulation of labor relations, conditions and disputes, and often provide guidance for developing national and local policies⁸³. It is undeniable that, if approved, the Platform Labor Convention will provide important momentum in the fight to improve working conditions of platform data workers, even though the principles-based approach limits the prospects for robust, concrete international regulation.

Important advances

The direct and specific inclusion of non-location-based platform workers in the scope of this proposal is a very important victory. Reaffirming the applicability of all the rights set out in the Declaration on Fundamental Principles and Rights at Work for data workers engaged through platforms is certainly not groundbreaking, yet it is a decisive signal against the deepening labor commodification seen in this type of work⁸⁴.

The question of jurisdiction, which is central to labor disputes in non-location-based platform work, is directly settled (Article 18), which offers much-needed clarity and legal certainty, as it provides a solid foundation for future disputes and legal action from workers. Similarly, the transparency requirements for the terms of engagement (Article 17) opens up avenues for contestation and redress of unfair and abusive practices. It must be noted that this does not address the significant disparities between countries regarding legal protections that, as mentioned, are central to the continuing precarity of data workers⁸⁵.

Another important victory is the requirement that remuneration follow national regulations, without undue deductions, and in clear terms (Article 9), which could prevent many configurations of wage theft encountered by platform data workers, particularly in

⁸³ International Labour Organization, *Rules of the Game: An Introduction to the Standards-Related Work of the International Labour Organization* (International Labour Office, 2019).

⁸⁴ Wood et al., 'Networked but Commodified: The (Dis)Embeddedness of Digital Labour in the Gig Economy'.

⁸⁵ Tubaro et al., 'Where Does AI Come from? A Global Case Study across Europe, Africa, and Latin America'; Posada, 'The Coloniality of Data Work'; Kapania et al., "'The Plan Is Just Survival'".

the case of Amazon Mechanical Turk, which pays wages in the form of Amazon gift cards⁸⁶.

Evaluating impact: useful and useless vagueness

Universality and flexibility are fundamental for the successful implementation of any international regulation across diverse cultural and historical backgrounds, legal systems and levels of economic development⁸⁷. A certain level of vagueness in the formulations and requirements is needed, particularly given the principles-based approach chosen for this instrument, which explicitly aims for broad principles rather than precise rules. This is reflected throughout the draft, with many Articles showing a very high degree of abstraction, requiring member states, for instance, to implement “*appropriate* measures for the prevention of occupational accidents, occupational diseases or any other injuries” (Article 4) and “*effective and appropriate* safeguards concerning digital platform workers’ personal data” (Article 15).

In this context, it is challenging to concretely evaluate this Convention’s impact for data workers. A helpful lens to adopt is asking whether the vagueness of general language and principles offers useful avenues for strategic negotiation of the issues most relevant to data workers, or if it instead hinders advancements by offering too little substance. Useful vagueness, here, refers to the potential of broad formulations and generalizations to serve as spaces for contention and dispute that open opportunities for improvement. Standards on minimum wages, for instance, do not require member states to set a specific minimum wage, but to establish a system to establish minimum wage rates appropriate to their level of economic development⁸⁸. This vagueness can be useful, as it leaves room for fighting for higher levels of “appropriate wage rates”. There are, however, instances where vagueness is not useful and instead makes certain requirements almost void of meaning.

Useful vagueness: avenues for further advancements

As seen above, the technologically-mediated nature of work on platforms is among the topics most directly tackled by the Convention. Transparency requirements for the use of automated systems (Article 12) and written explanations and human review of decisions (Article 14) are important requirements that provide a solid basis to reduce the opacity and unresponsiveness of platforms. However, they are not sufficient, in themselves, to prevent abuses by the platforms. The very broad mandate to “require digital labour platforms to ensure that their use of the automated systems referred to in Article 12 does not infringe

⁸⁶ Chávez, ‘Impact of Gift Card Payments on MTurk Workers.’

⁸⁷ International Labour Organization, *Rules of the Game: An Introduction to the Standards-Related Work of the International Labour Organization*.

⁸⁸ International Labour Organization, *Rules of the Game: An Introduction to the Standards-Related Work of the International Labour Organization*.

on the fundamental principles and rights at work” set out in Article 13 offers a number of avenues for further contestation. Here, the broad reference to a larger set of rights opens up many avenues to fight against abusive practices of automated decision-making.

Following this same logic, Article 16, which prohibits “the 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 grounds”, leaves much room for further advancement. “Otherwise unjustified grounds” is a particularly useful instance of vagueness, as it leaves abundant avenues for workers to mobilize national legislation and even moral arguments when fighting against unilateral account suspensions.

Article 15, which requires safeguards concerning the extent and processing of workers’ personal data to “ensure that it is processed only to the extent strictly necessary for the purpose of their employment or engagement,” also opens many possibilities for data workers. Not only does it establish personal data and privacy rights as entitlements of platform workers, but it could also be mobilized to achieve greater insights into performance monitoring. Here, the vague formulation leaves important avenues for contestation by data workers to gain the right to know what data is being taken and kept about their performance, as well as the extent to which it is processed for decision-making systems. In contrast, the lack of mention of complaint and redress systems regarding these safeguards makes the protections set out in this Article less robust.

Useless vagueness: watered-down effectiveness

Article 5 also establishes important principles regarding safety and health. However, the current formulation is not conducive to effective protections for data workers.

*“Each Member shall take measures to ensure that digital platform workers have the right to remove themselves from a work situation which they have **reasonable justification to believe presents an imminent and serious danger to their life or health**, without suffering undue consequences and that they shall inform the digital labor platform without delay.”*

The principle established here—that workers have a right to remove themselves from dangers without suffering undue consequences—is paramount to the protection of platform workers. However, the formulation in terms of “reasonable justification” and “imminent danger” is abstract to such an extent that it compromises effectiveness. It places the burden of justification on workers, does not address whether the time dedicated to partially completing the work will be compensated and sets out no responsibilities for platforms to remedy and prevent repeated dangers. Particularly when

it comes to mental health—where harm is often a consequence of compounding exposure⁸⁹—this formulation fails in excluding dangers that are not imminent.

Article 20, which concerns dispute resolution mechanisms and remediation, is another example of a necessary and important principle which falls short in its formulation. The text mandates “easy access to safe, fair and effective dispute resolution mechanisms and to appropriate and effective remedies” for disagreements between digital platform workers and digital labor platforms. This is an important and much-needed improvement. However, given that account suspensions of data workers and other non-location-based workers mean that they lose access to any communication channels and frequently report that these are insufficient and unresponsive to begin with, this article falls short of addressing urgent issues of the platform economy.

Limitations and gaps

While it is undoubtedly an important advancement and opens many paths for further improvements to the protection of workers, the proposed Platform Labor Convention has some clear gaps from the perspective of data workers.

Secrecy and NDAs

The key problem of systematic union busting reported by data workers is not addressed. While the Convention does explicitly affirm the Fundamental Principles and Rights at Work, including the rights to freedom of association and collective bargaining (Article 3), it leaves the significant barriers to their full realization in the platform economy unmentioned. Excessively restrictive non-disclosure agreements hinder data workers’ ability to articulate collective organization, in the same way that prohibitions to discuss one’s wages with colleagues sabotage mobilization against discrimination and the negotiation of collective agreements. Data workers engaged through platforms face heavy penalties and can have their accounts suspended for as little as participating in peer groups on social media⁹⁰. It is fundamental to address NDAs in the platform economy for the same reason that most countries have regulations that protect the right to discuss wages. More than a question of vagueness, the failure to address a structural problem denounced by data workers, which may very well become more widespread, is a significant limitation of this Convention.

Compensable time and wages

A second, significant gap in this draft regards the question of compensable time. One of the key issues of all platform work is what should be considered for wages: is it only time

⁸⁹ Malgwi, ‘A Mental Health Intervention for Data Workers’.

⁹⁰ Dias, ‘Data Work Is Too Secretive. Big Tech Should Be Held Accountable’; Kinyua, ‘Invisible Hands, Visible Futures’.

spent on tasks? The time necessary to prepare and complete tasks? Or all time spent online? ⁹¹. Depending on this decision, the corresponding hourly wages vary significantly. This proposal fails to address this uncertainty regarding central features of working conditions: wages and working times. This gap leaves the possibility for continuing wage theft in the form of unpaid breaks, trainings and waiting times. It is particularly prejudicial to platform data workers, whose tasks are often broken down to a few clicks, but who must still dedicate significant time to reading and understanding instructions and training materials ⁹².

Regarding these crucial questions, the proposed text also defines that those platform workers in employment relationships are entitled to the applicable statutory or negotiated minimum wage; for all others, the text only requires member states to extend such measures “to the extent possible and as appropriate” (Article 9, §3). In as many words, most platform workers will not be entitled to minimum wage protections.

The continuing centrality of the employment relationship

Indeed, throughout the Convention, the employment relationship continues to be an important element. Article 11 determines that “digital platform workers enjoy social security protection on terms *no less favourable than those applicable to other workers with the same classification of status in employment*” and Article 22 adopts the same differentiation of legal status. In maintaining the distinction between employees and other workers, this proposal fails to address a core element of the platform economy, namely that it profits from and reinforces the gaps in labor rights coverage for workers in non-standard work arrangements ⁹³. The framing of platform work relationships in terms of service rather than employment serves platforms much more than workers, who lose out on many rights and protections. The ILO itself has highlighted the persistent challenges of non-standard work arrangements to the realization of decent work, since labor rights instruments “lose their equalizing power, normative efficacy, and finally their regulatory purpose” ⁹⁴.

While the Convention does include an article addressing the classification in respect of the existence of an employment relationship, it only requires “measures to ensure the correct classification of digital platform workers” (Article 8). Rather than explicitly promoting the equalization of protections, the text refers to “the facts relating to the performance of work and the remuneration of the digital platform worker, and considering the specificities

⁹¹ Dubal, *The Legal Uncertainties of Gig Work*.

⁹² Alrayes, ‘Annotate to Educate: The Dual Life of a Syrian Student & Data Annotator’.

⁹³ Gianibelli and International Labour Organization - Bureau for Workers' Activities, ‘New Methods of Governance for Non-Standard Forms of Work’; International Labour Organization, *Non-Standard Employment around the World*.

⁹⁴ Gianibelli and International Labour Organization - Bureau for Workers' Activities, ‘New Methods of Governance for Non-Standard Forms of Work’.

of work via digital labour platforms” as vague factors for this classification. Here again, the effectiveness of this principle is watered down by ambiguous and timid language.

Policy Recommendations: How Data Workers' Issues Can be Better Addressed

This section outlines policy recommendations for how data workers' issues can be better addressed within the spirit of what is on the table and within the confines of a principles-based convention. Certainly, more substantive standards would be hugely welcome and bold visions for alternatives remain essential. Particularly when it comes to the continuing distinction between employees and other workers, which is central to the emergence of differential treatment and the erosion of labor standards in the platform economy and is not addressed by this proposal. Still, there is room to improve the impact of this proposal for data workers.

This report has summarized the core issues that platform data workers face and outlined where the proposed draft Convention is insufficient or too vague to significantly improve these problems. These recommendations, accordingly, follow the general principle of adapting the passages that are too diluted by vagueness to be effective and suggesting broad principles to the Articles where there is already some potential of improvement to concretize this. The current draft is the result of significant compromises, and negotiations are still not concluded. In the last year, commentary to the draft has led to revisions reducing the proposal from 31 Articles to 24 by "removing certain provisions; [and] transferring selected Articles from the draft Convention to the draft Recommendation"⁹⁵. The fight to ensure this principles-based approach does not compromise worker protections is not over, and there is room for all parties to shift the balance.

1. Explicitly mention mental health

Article 4, which mandates "appropriate measures for the prevention of occupational accidents, occupational diseases and any other injuries", could be amended to explicitly mention protections for workers' mental health. In keeping with the principles-based approach, the question of what constitutes appropriate measures remains open to further specification, but it would greatly increase the chances that workers can obtain strong protections during negotiations of the specific criteria. This amendment would also align with the understanding of health as "not merely the absence of disease or infirmity; it also includes the physical and mental elements affecting health which are directly related to

⁹⁵ International Labour Organization, *Realizing Decent Work in the Platform Economy - Draft Convention and Recommendation*, ILC.114/Report V(4) (International Labour Office, 2026), <https://www.ilo.org/sites/default/files/2026-03/ILC114-Report-V%284%29-%5BWORKQ-260102-001%5D-EN.pdf>.

safety and hygiene at Work” laid out in the Occupational Safety and Health Convention, 1981 (No. 155), one of the core documents of the ILO.

Given the centrality of acute stress, trauma, PTSD and other grave harms in data work ⁹⁶, we consider it necessary to signal that appropriate protections also cover these aspects. Many workers’ representatives have made it clear that platform workers face real risks, including psychosocial hazards, and platforms must bear occupational safety and health (OSH) responsibilities regardless of employment classification. Some provisions of the 2025 draft, which were since removed or relocated to the Recommendation, represent a good strategic point to anchor this discussion. The following paragraphs introduce important elements relating to psychosocial risk factors and could be reintroduced to the Convention:

*“Steps taken by a Member to implement paragraph 1 of this Article shall seek to prevent occupational accidents, occupational diseases and any other injuries to health associated with **long hours of work and insufficient rest periods.**”* (Article 4, §2 (2025 draft)), and

“Each Member shall require digital labour platforms to ensure that their use of the automated systems referred to in Article 15 does not infringe on the fundamental principles and rights at work. In particular, such use shall not:

*[...] (b) have harmful effects on the safety and health of digital platform workers, including by increasing the **risks of work-related accidents and psychosocial hazards.**”* (Article 16 (2025 draft))

2. Limit the use of non-disclosure agreements

The secrecy in the data work industry and the use of extensive non-disclosure agreements to sustain it are among its central issues ⁹⁷. This report has spotlighted the role of such non-disclosure agreements as a barrier to the realization of data workers’ right to collective bargaining and organization. Given the centrality of these fundamental rights, the gravity of this violation and also the large number of workers impacted by these practices, we consider it essential to address this practice. Tripartite dialogue, the foundational organizing principle of the International Organization, is impossible when workers are disenfranchised and barred from speaking up through penalties, loss of income, or suspensions.

⁹⁶ Malgwi, ‘A Mental Health Intervention for Data Workers’; al-Hammada, ‘“If I Had Another Job, I Would Not Accept Data Annotation Tasks”: How Syrian Refugees in Lebanon Train AI’; Berhane Gebrekidan, ‘Content Moderation: The Harrowing, Traumatizing Job That Left Many African Data Workers with Mental Health Issues and Drug Dependency’.

⁹⁷ Asia, ‘The Emotional Labor Behind AI Intimacy’; Dias, ‘Data Work Is Too Secretive. Big Tech Should Be Held Accountable’; Lais et al., ‘From Data Workers to Data Workers – Precarious Working Conditions in Content Moderation and Their Consequences for Workers’; Clara and B, ‘Behind The Face of AI’.

This topic could be addressed, in keeping with the approach of the Convention, as requirements for appropriate limits to non-disclosure agreements in session XIII, where the terms and conditions of employment or engagement are addressed, for example, by prohibiting “undue restrictions to participation in workers’ organizations or their activities”. Additionally, incorporating Article 16 of the draft Recommendation into the Convention would be a relatively straightforward path to tackle the protection of workers’ rights to organize from the angle of digital surveillance and data protection. Here, the following paragraphs prohibiting data collection stand out: “(a) relating to private conversations, including exchanges with workers’ representatives; [and] (b) concerning membership of workers’ organizations or participation in their activities” (Recommendation, Article 16 (a), 16 (b)).

3. Define compensable time

The question of compensable time is fundamental to any discussion of remuneration and statutory minimum wages. It cannot be relegated to the Recommendation. As discussed, platform data workers perform multiple activities that go uncompensated despite being essential to the work, and, like most other platform workers, spend time waiting for tasks and are not entitled to paid breaks. In the current draft Recommendation this topic only receives mention in a subparagraph suggesting workers should be compensated for waiting times (Article 11 §c), which is woefully insufficient for this key issue. A Convention that effectively promotes fair payment for data workers must make clear that all the time dedicated to work is to be compensated.

Crucially, leaving this question unaddressed creates the strong possibility of regulatory differences between countries. Considering that non-location-based platforms already profit from regulatory gaps across labor geographies and practice price discrimination by location⁹⁸, this fosters a race-to-the-bottom dynamic rather than protection. This reinforces and strengthens incentives for the practice data work platforms already implement: leaving a country once workers start organizing or once regulations are put in place, restricting the availability of tasks to locations where legislation is laxer, as exemplified by Remotasks in Kenya⁹⁹.

4. Expand the scope of review for task rejections

A related recommendation concerns the topic of human reviews of automated decisions that “result in the non-disbursement of any amount due to digital platform workers, or the

⁹⁸ Tubaro et al., ‘Where Does AI Come from? A Global Case Study across Europe, Africa, and Latin America’; Posada, ‘The Coloniality of Data Work’; Kapania et al., ‘“The Plan Is Just Survival”’.

⁹⁹ Okinyi, ‘Impact of Remotasks Closure on Kenyan Workers’.

suspension or deactivation of their account, or the termination of their employment or engagement with a digital labor platform” (Article 14 §b).

Firstly, this article could be strengthened by mandating appropriate remediation when unfair automated decisions are identified by human reviews, which is only implied in the current text. Secondly, given that algorithmic systems are employed to both vet data workers’ outputs and evaluate their performance as a whole, the requirement for written explanations could be expanded to include disclosure of what personal data is being taken and processed, thereby strengthening workers’ data protection rights.

Thirdly, further clarification is needed regarding partially completed work, the time invested by workers and ownership of the outputs of work considered insufficient. Unlike delivering goods to a destination, in data work there is much room for interpretation about whether the work was satisfactorily completed. As it stands today, clients and platforms define what is considered accurate and set quotas through discretionary, often arbitrary, decisions¹⁰⁰. They may keep ownership of the outputs considered bad¹⁰¹ and it is common for an entire batch of work to be rejected based on the overall quality rather than each individual data point. Without clarification on the points mentioned, human review of decisions of non-disbursement cannot adequately protect data workers from wage theft and unfair decisions. More comprehensive protection of workers can be achieved by a more robust reviewing system that considers whether the standards required of workers are reasonable and well justified, with the goal of shielding them from unjustified demands and stress.

Lastly, it must be made explicit that rejections are also within the scope of the dispute resolution and remediation mechanisms set out in Article 20. Robust systems, which are responsive and easily accessible to non-location based workers even if their accounts have been suspended are essential to give workers recourse against wage theft.

5. Promote decent work through recognition of skills and experience

Finally, the Convention could be expanded on the topic of employment promotion to support the development of data workers (Article 7). Efforts to improve the recognition of experiences and skills, for instance, through measures to make work histories transparent and transferable between platforms, could strengthen professionalization and career development. Indeed, professional recognition is a central demand articulated by data workers in both platforms and BPOs¹⁰². A system fostering transparent work histories and skills would, on the one hand, reduce the loss workers face in the eventuality of their

¹⁰⁰ Zhang et al., ‘The Making of Performative Accuracy in AI Training’.

¹⁰¹ McInnis et al., ‘Taking a HIT’.

¹⁰² Lais et al., ‘From Data Workers to Data Workers – Precarious Working Conditions in Content Moderation and Their Consequences for Workers’.

suspension from a platform, which today amounts to “losing past work history – like losing your resume – along with qualifications and relationships with requesters”¹⁰³, while on the other hand making it easier for platforms and clients to evaluate workers’ previous experiences. Greater professionalization, paths for career progression and the promotion of skilled work are in the interest of workers, employers and governments, particularly given the growing shift toward requiring more specialized, technical expertise and the need to protect workers from displacement¹⁰⁴.

¹⁰³ Chávez, ‘Impact of Gift Card Payments on MTurk Workers’.

¹⁰⁴ Kingua, ‘Invisible Hands, Visible Futures’.

References

- Abdelkadir, Nuredin Ali, Tianling Yang, Shivani Kapania, et al. 'Beyond Content Exposure: Systemic Factors Driving Moderators' Mental Health Crisis in Africa'. *Proceedings of the 2026 CHI Conference on Human Factors in Computing Systems* (New York, NY, USA), CHI '26, 13 April 2026, 1–18. <https://doi.org/10.1145/3772318.3791639>.
- Abdelkadir, Nuredin Ali, Tianling Yang, Shivani Kapania, et al. 'The Role of Expertise in Effectively Moderating Harmful Social Media Content'. *Proceedings of the 2025 CHI Conference on Human Factors in Computing Systems* (New York, NY, USA), CHI '25, 25 April 2025, 1–21. <https://doi.org/10.1145/3706598.3714010>.
- Abdelkadir, Nuredin Ali, Tianling Yang, Shivani Kapania, et al. 'The Role of Expertise in Effectively Moderating Harmful Social Media Content'. Edited by Naomi Yamashita, Vanessa Evers, Koji Yatani, et al. ACM, 2025. <https://doi.org/10.1145/3706598.3714010>.
- Alrayes, Yasser. 'Annotate to Educate: The Dual Life of a Syrian Student & Data Annotator'. In *Data Workers' Inquiry*, edited by Milagros Miceli, Adio Dinika, Krystal Kauffman, Camilla Salim Wagner, and Laurenz Sachenbacher. 2024. <https://data-workers.org/yasser>.
- Alzate, David. *The Effects of Regulating Platform-Based Work on Employment Outcomes: A Review of the Empirical Evidence*. No. 193830. World Bank Group, 2024. <http://documents.worldbank.org/curated/en/099100124224513583>.
- Antunes, Ricardo L. C. *Uberização, trabalho digital e indústria 4.0*. Mundo do trabalho. Boitempo, 2022.
- Asia, Michael Geoffrey. 'The Emotional Labor Behind AI Intimacy'. In *Data Workers' Inquiry*. 2026. <https://data-workers.org/michael/>.
- Bender, Emily M., and Alex Hanna. *The AI Con*. First edition. HarperCollins, 2025.
- Berg, Janine, Marianne Furrer, Ellie Harmon, Uma Rani, and M. Six Silberman. *Digital Labour Platforms and the Future of Work: Towards Decent Work in the Online World*. With Internationale Arbeitsorganisation. International Labour Organization, 2018.
- Bergvall-Kåreborn, Birgitta, and Debra Howcroft. 'Amazon Mechanical Turk and the Commodification of Labour'. *New Technology, Work and Employment* 29, no. 3 (2014): 213–23. <https://doi.org/10.1111/ntwe.12038>.
- Berhane Gebrekidan, Fasica. 'Content Moderation: The Harrowing, Traumatizing Job That Left Many African Data Workers with Mental Health Issues and Drug Dependency'. In *Data Workers' Inquiry*, edited by Milagros Miceli, Adio Dinika, Krystal

- Kauffman, Camilla Salim Wagner, and Laurenz Sachenbacher. 2024. <https://data-workers.org/fasica>.
- Booth, Robert. 'More than 140 Kenya Facebook Moderators Diagnosed with Severe PTSD'. Media. *The Guardian*, 18 December 2024. <https://www.theguardian.com/media/2024/dec/18/kenya-facebook-moderators-sue-after-diagnoses-of-severe-ptsd>.
- Casilli, Antonio A., and Julian Posada. 'The Platformization of Labor and Society'. In *Society and the Internet. How Networks of Information and Communication Are Changing Our Lives*, 2nd edn, edited by Mark Graham and William H. Dutton. Oxford University Press, 2019. <https://doi.org/10.1093/oso/9780198843498.003.0018>.
- Chávez, Alexis. 'Impact of Gift Card Payments on MTurk Workers'. In *Data Workers' Inquiry*, edited by Milagros Miceli, Adio Dinika, Krystal Kauffman, Camilla Salim Wagner, and Laurenz Sachenbacher. 2024. <https://data-workers.org/alex>.
- Chen, Adrian. 'The Laborers Who Keep Dick Pics and Beheadings Out of Your Facebook Feed'. Tags. *Wired*, 23 October 2014. <https://www.wired.com/2014/10/content-moderation/>.
- Clara and B. 'Behind The Face of AI'. In *Data Workers' Inquiry*. 2026. <https://data-workers.org/france/>.
- Datta, Namita, Chen Rong, Singh Sunamika, et al. *Working without Borders: The Promise and Peril of Online Gig Work*. (Washington, DC), ahead of print, 2023. <https://doi.org/10.1596/40066>.
- Dias, Tatiana. 'Data Work Is Too Secretive. Big Tech Should Be Held Accountable'. *TechPolicy.Press*, 15 April 2026. <https://www.techpolicy.press/data-work-is-too-secretive-big-tech-should-be-held-accountable/>.
- Dieuaide, Patrick, and Christian Azais. 'Platforms of Work, Labour, and Employment Relationship: The Grey Zones of a Digital Governance'. *Frontiers in Sociology* 5 (2020): 2. <https://doi.org/10.3389/fsoc.2020.00002>.
- Dubal, Veena. *The Legal Uncertainties of Gig Work*. 2024. <https://doi.org/10.1093/oxfordhb/9780192870360.013.61>.
- Ekbia, Hamid, and Bonnie Nardi. 'Heteromation and Its (Dis)Contents: The Invisible Division of Labor between Humans and Machines'. *First Monday*, ahead of print, 2014. <https://doi.org/10.5210/fm.v19i6.5331>.

- Fuentes, Oskarina. 'Life of a Latin American Data Worker'. In *Data Workers' Inquiry*, edited by Milagros Miceli, Adio Dinika, Krystal Kauffman, Camilla Salim Wagner, and Laurenz Sachenbacher. 2024. <https://data-workers.org/oskarina>.
- Gandini, Alessandro. 'Labour Process Theory and the Gig Economy'. *Human Relations* 72, no. 6 (2019): 1039–56. <https://doi.org/10.1177/0018726718790002>.
- Gerber, Christine. 'Alte Herrschaft indigitalen Gewändern? - Der Arbeitsprozess auf CrowdWorking Plattformen'. In *Marx und die Roboter: vernetzte Produktion, Künstliche Intelligenz und lebendige Arbeit*, 2. Auflage, edited by Florian Butollo and Sabine Nuss. Analysen. Dietz, 2019.
- Gianibelli, Guillermo and International Labour Organization - Bureau for Workers' Activities. 'New Methods of Governance for Non-Standard Forms of Work'. *International Journal of Labour Research* 9, nos 1–2 (2019): 123–43.
- Gray, Mary L., and Siddharth Suri. *Ghost Work: How to Stop Silicon Valley from Building a New Global Underclass*. International edition. Houghton Mifflin Harcourt, 2019.
- Grohmann, Rafael, Maria Aquino, Alison Rodrigues, Évilin Matos, Caroline Nunes, and Adriana Amaral. 'Click Farm Platforms: An Updating of Informal Work in Brazil and Colombia'. *Work Organisation, Labour & Globalisation* 16 (January 2022). <https://doi.org/10.13169/workorgalaboglob.16.2.0007>.
- Grohmann, Rafael, Willian Fernandes Araújo, Rafael Grohmann, and Willian Fernandes Araújo. 'O chão de fábrica (brasileiro) da inteligência artificial: a produção de dados e o papel da comunicação entre trabalhadores de Appen e Lionbridge'. *Palavra Chave* 24, no. 3 (2021). <https://doi.org/10.5294/pacla.2021.24.3.8>.
- Haidar, Julieta, and Maarten Keune. 'Introduction: Work and Labour Relations in Global Platform Capitalism'. In *Work and Labour Relations in Global Platform Capitalism*, edited by Julieta Haidar and Maarten Keune. Edward Elgar Publishing, 2021.
- Hammada, Roukaya al-. "'If I Had Another Job, I Would Not Accept Data Annotation Tasks': How Syrian Refugees in Lebanon Train AI". In *Data Workers' Inquiry*, edited by Milagros Miceli, Adio Dinika, Krystal Kauffman, Camilla Salim Wagner, and Laurenz Sachenbacher. 2024. <https://data-workers.org/Roukaya>.
- Hao, Karen. *Empire of AI: Dreams and Nightmares in Sam Altman's OpenAI*. Penguin Press, 2025.
- International Labour Organization. *Decent Work in the Platform Economy*. ILC.114/V(3). International Labour Office, 2025.
- International Labour Organization. *Non-Standard Employment around the World*. International Labour Office, 2016.

https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40dgreports/%40dcomm/%40publ/documents/publication/wcms_534326.pdf.

International Labour Organization. *Realizing Decent Work in the Platform Economy - Draft Convention and Recommendation*. ILC.114/Report V(4). International Labour Office, 2026.

<https://www.ilo.org/sites/default/files/2026-03/ILC114-Report-V%284%29-%5BWOR KQ-260102-001%5D-EN.pdf>.

International Labour Organization. *Realizing Decent Work in the Platform Economy*. ILC.113/Report V(1). International Labour Office, 2024.

<https://www.ilo.org/resource/conference-paper/ilc/ilc114/realizing-decent-work-platform-economy-draft-convention-and-recommendation>.

International Labour Organization. *Rules of the Game: An Introduction to the Standards-Related Work of the International Labour Organization*. International Labour Office, 2019.

International Labour Organization. *World Employment and Social Outlook 2021: The Role of Digital Labour Platforms in Transforming the World of Work*. (Geneva) 2021 (2021): 282.

Irani, Lilly, and M. Six Silberman. 'Turkopticon: Interrupting Worker Invisibility in Amazon Mechanical Turk'. Edited by Wendy E. Mackay. ACM Conferences. ACM, 2013. <https://doi.org/10.1145/2470654.2470742>.

Kapania, Shivani, Tianling Yang, Nuredin Ali Abdelkadir, et al. "'The Plan Is Just Survival': Data Work in Kenya and the Regime of Entrapment'. *Proceedings of the 2026 CHI Conference on Human Factors in Computing Systems* (New York, NY, USA), CHI '26, 13 April 2026, 1–17. <https://doi.org/10.1145/3772318.3791097>.

Kingua, Joan. 'Invisible Hands, Visible Futures: The Rise of Africa's Data Worker Movement in the Age of AI'. Substack newsletter. *DataSyn*, 6 May 2026. https://datasyn.substack.com/p/invisible-hands-visible-futures-the?utm_medium=web.

Lais, Layla, and Omar. 'From Data Workers to Data Workers – Precarious Working Conditions in Content Moderation and Their Consequences for Workers'. In *Data Workers' Inquiry*, edited by Milagros Miceli, Adio Dinika, Krystal Kauffman, Camilla Salim Wagner, and Laurenz Sachenbacher. 2024. <https://data-workers.org/essen>.

Le Ludec, Clément, Maxime Cornet, and Antonio A. Casilli. 'The Problem with Annotation. Human Labour and Outsourcing between France and Madagascar'. *Big Data & Society* 10, no. 2 (2023): 20539517231188723. <https://doi.org/10.1177/20539517231188723>.

- Malgwi, Kauna. 'A Mental Health Intervention for Data Workers'. In *Data Workers' Inquiry*, edited by Milagros Miceli, Adio Dinika, Krystal Kauffman, Camilla Salim Wagner, and Laurenz Sachenbacher. 2025. <https://data-workers.org/kauna>.
- Mantouvalou, Virginia. 'Are Labour Rights Human Rights?' *European Labour Law Journal* 3, no. 2 (2012): 151–72. <https://doi.org/10.1177/201395251200300204>.
- Mantouvalou, Virginia. 'Labor Rights'. In *The Oxford Handbook of Economic and Social Rights*, edited by Malcolm Langford and Katharine Galloway Young. Oxford Handbooks Online Law. Oxford University Press, 2022. <https://doi.org/10.1093/oxfordhb/9780197550021.013.57>.
- McInnis, Brian, Dan Cosley, Chaebong Nam, and Gilly Leshed. 'Taking a HIT: Designing around Rejection, Mistrust, Risk, and Workers' Experiences in Amazon Mechanical Turk'. *Proceedings of the 2016 CHI Conference on Human Factors in Computing Systems* (New York, NY, USA), CHI '16, 7 May 2016, 2271–82. <https://doi.org/10.1145/2858036.2858539>.
- Miceli, Milagros, and Julian Posada. 'The Data Production Dispositif'. *Proceedings of the ACM on Human-Computer Interaction* 6 (November 2022): 37. <https://doi.org/10.1145/3555561>.
- Miceli, Milagros, Martin Schuessler, and Tianling Yang. 'Between Subjectivity and Imposition: Power Dynamics in Data Annotation for Computer Vision'. *Proc. ACM Hum.-Comput. Interact.* 4, no. CSCW2 (2020): 115:1-115:25. <https://doi.org/10.1145/3415186>.
- Muldoon, James, Callum Cant, Boxi Wu, and Mark Graham. 'A Typology of Artificial Intelligence Data Work'. *Big Data & Society* 11, no. 1 (2024). <https://doi.org/10.1177/20539517241232632>.
- Muldoon, James, Mark Graham, and Callum Cant. *Feeding the Machine: The Hidden Human Labor Powering A.I.* Canongate Books, 2024.
- Nzomo, Brian. 'Online Gig Workers Left Stranded as Remotasks Exits Kenya'. Kenya Business News. *The Kenyan Wallstreet*, 13 March 2024. <https://kenyanwallstreet.com/gig-workers-stranded-as-remotasks-exits-kenya>.
- Okinyi, Mophat. 'Impact of Remotasks Closure on Kenyan Workers'. In *Data Workers' Inquiry*, edited by Milagros Miceli, Adio Dinika, Krystal Kauffman, Camilla Salim Wagner, and Laurenz Sachenbacher. 2024. <https://data-workers.org/mophat>.
- Paul, Kari. 'Facebook to Pay \$52m for Failing to Protect Moderators from "horrors" of Graphic Content'. Technology. *The Guardian*, 13 May 2020. <https://www.theguardian.com/technology/2020/may/12/facebook-settlement-mental-health-moderators>.

- Paullada, Amandalynne, Inioluwa Deborah Raji, Emily M. Bender, Emily Denton, and Alex Hanna. 'Data and Its (Dis)Contents: A Survey of Dataset Development and Use in Machine Learning Research'. *Patterns* 2, no. 11 (2021): 100336. <https://doi.org/10.1016/j.patter.2021.100336>.
- Perrigo, Billy. 'The \$2 Per Hour Workers Who Made ChatGPT Safer'. *TIME*, 18 January 2023. <https://time.com/6247678/openai-chatgpt-kenya-workers/>.
- Posada, Julian. 'The Coloniality of Data Work'. Doctoral Dissertation, University of Toronto, 2022. <http://hdl.handle.net/1807/126388>.
- Ranta, Botlhokwa Nondali Ditshepo. 'The Unknown Women of Content Moderation.' In *Data Workers' Inquiry*, edited by Milagros Miceli, Adio Dinika, Krystal Kauffman, Camilla Salim Wagner, and Laurenz Sachenbacher. 2024. <https://data-workers.org/ranta>.
- Roberts, Sarah T. *Behind the Screen: Content Moderation in the Shadows of Social Media*. Yale University Press, 2019.
- Ruba. 'IA Artificial'. In *Data Workers' Inquiry*, edited by Milagros Miceli, Adio Dinika, Krystal Kauffman, Camilla Salim Wagner, and Laurenz Sachenbacher. 2024. <https://data-workers.org/ruba>.
- Salmivaara, Anna. 'New Governance of Labour Rights: The Perspective of Cambodian Garment Workers' Struggles'. *Globalizations* 15, no. 3 (2018): 329–46. <https://doi.org/10.1080/14747731.2017.1394069>.
- Salvagni, Julice, and Rafael Grohmann. 'Data Work for Beginners: Neoliberal Pedagogies and the Circulation of Platform Labor'. *Journal of Sociology*, 23 April 2026, 14407833261425835. <https://doi.org/10.1177/14407833261425835>.
- Schmidt, Florian A. 'The Planetary Stacking Order of Multilayered Crowd-AI Systems'. In *Digital Work in the Planetary Market*, edited by Mark Graham and Fabian Ferrari. The MIT Press, 2022. <https://doi.org/10.7551/mitpress/13835.003.0012>.
- Schwartz, Oscar. 'Untold History of AI: How Amazon's Mechanical Turkers Got Squeezed Inside the Machine'. *IEEE Spectrum*, 22 April 2019. <https://spectrum.ieee.org/untold-history-of-ai-mechanical-turk-revisited-tkkt>.
- Silva, Margarida. 'Big Tech Sets Unfair Terms and Conditions for AI Data Workers Globally'. *SOMO*, 31 March 2026. <https://www.somo.nl/big-tech-sets-unfair-terms-and-conditions-for-ai-data-workers-globally/>.
- Solon, Olivia. 'Facebook Is Hiring Moderators. But Is the Job Too Gruesome to Handle?' *Technology*. *The Guardian*, 4 May 2017.

<https://www.theguardian.com/technology/2017/may/04/facebook-content-moderators-ptsd-psychological-dangers>.

Tubaro, Paola, Antonio A. Casilli, Maxime Cornet, Clément Le Ludec, and Juana Torres Cierpe. 'Where Does AI Come from? A Global Case Study across Europe, Africa, and Latin America'. *New Political Economy* 30, no. 3 (2025): 359–72. <https://doi.org/10.1080/13563467.2025.2462137>.

Tubaro, Paola, Antonio A. Casilli, and Marion Coville. 'The Trainer, the Verifier, the Imitator: Three Ways in Which Human Platform Workers Support Artificial Intelligence'. *Big Data & Society* 7, no. 1 (2020): 2053951720919776. <https://doi.org/10.1177/2053951720919776>.

Tubaro, Paola, Clément Le Ludec, and Antonio A. Casilli. 'Counting "Micro-Workers": Societal and Methodological Challenges around New Forms of Labour'. *Work Organisation, Labour & Globalisation* 14, no. 1 (2020). <https://doi.org/10.13169/workorglaboglob.14.1.0067>.

Viana Braz, Matheus, Vitória Bertolaccini, Paula Ramos, Ana Clara, and Santos Silva. 'Turkerização e Gestão Algorítmica Do Trabalho Em Plataformas de Microtarefas'. *Conversas Em Psicologia* 1 (June 2021): 01–16. <https://doi.org/10.33872/conversaspsico.v1n1.turkerizacao>.

Weil, David. *The Fissured Workplace*. Harvard University Press, 2014. <https://doi.org/10.4159/9780674726123>.

Wiessner, Daniel. 'YouTube Settles Moderators' Case over Graphic Videos for \$4.3 Mln'. Transactional. *Reuters*, 13 July 2022. <https://www.reuters.com/legal/transactional/youtube-settles-moderators-case-over-graphic-videos-43-mln-2022-07-13/>.

Wood, Alex J., Mark Graham, Vili Lehdonvirta, and Isis Hjorth. 'Good Gig, Bad Gig: Autonomy and Algorithmic Control in the Global Gig Economy'. *Work, Employment and Society* 33, no. 1 (2019): 56–75. <https://doi.org/10.1177/0950017018785616>.

Wood, Alex J., Mark Graham, Vili Lehdonvirta, and Isis Hjorth. 'Networked but Commodified: The (Dis)Embeddedness of Digital Labour in the Gig Economy'. *Sociology* 53, no. 5 (2019): 931–50. <https://doi.org/10.1177/0038038519828906>.

Wray, Ben. 'Content Moderation Is What a 21st Century Hazardous Job Looks Like'. *HesaMag*, December 2024.

Zhang, Ben Zefeng, Tianling Yang, Milagros Miceli, Oliver L. Haimson, and Michaelanne Thomas. 'The Making of Performative Accuracy in AI Training: Precision Labor and Its Consequences'. *Proceedings of the 2025 CHI Conference on Human Factors in Computing Systems*, 26 April 2025, 1–19. <https://doi.org/10.1145/3706598.3713112>.

