

No One to Call:

Refugee Platform Workers Need Effective Grievance Mechanisms

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Rawpixel. (n.d.). Photo of people [Photograph]. Rawpixel. Public domain.
<https://www.rawpixel.com/image/14760921/photo-image-face-people-clothing>

Executive Summary

Refugee platform workers often face sudden account suspensions or withheld earnings. Yet they lack effective grievance mechanism to dispute these decisions. Digital labour platforms provide important livelihood opportunities for refugees excluded from the formal job market. However, many face a "no one to call" dilemma due to algorithmic errors, language barriers, and limited legal support. This trend highlights a growing governance gap in the current digital livelihood model.

To address these challenges, this report recommends the implementation of several policy measures, introducing manual review channels for refugee documentation, a multilingual grievance mediation system, and bringing platform work under host-country labour regulation. By implementing these recommendations, platforms and governments can address existing governance gaps affecting refugees on digital platforms, promote decent work, and foster more inclusive economic and social integration.

Introduction

Over the past decade, digital labour platforms have expanded rapidly. There are currently more than 777 active online labour platforms worldwide, with approximately 163 million registered accounts (Kässi, Lehdonvirta & Stephany, 2021; ILO, 2021b). Platform work is remote and location-independent. This makes it particularly attractive for refugees who cannot access the formal job market. For many, it is the only available source of income. By the end of 2025, there are more than 100 million forcibly displaced people worldwide, including approximately 42.5 million refugees, and most of them face severe restrictions on formal employment (UNHCR, 2025).

► Table 1.1 Number of registered and active workers on selected digital labour platforms, September 2020

	Number of registered workers	Active or successful workers		Oversupply of workers (%)
		At least one project/ more than US\$1	More than 10 projects/ more than US\$1000	
PeoplePerHour*	126475	29143 (23%)	10798 (9%)	91.0
99designs*	42781	15794 (37%)	4271 (10%)	90.0
Workana*	95600	26312 (28%)	4820 (5%)	95.0
Freelancer**	95813	69993 (73%)	26195 (27%)	73.0
Guru**	1048575	4862 (0.5%)	1385 (0.1%)	99.9

* Refers to active workers based on completed projects. **Refers to active workers based on income earned.

Note: "Oversupply" is defined as the difference between registered and active workers (more than 10 projects/more than US\$1000 earned) on the platform. Figures in parentheses are percentages of total registered workers.

Source: Pesole and Rani (forthcoming).

Note. From World employment and social outlook 2021: The role of digital labour platforms in transforming the world of work (p. 50, Table 1.1), by International Labour Organization, 2021.

However, getting a job opportunity on the platform itself does not equal getting security. When a platform account is blocked and funds are withheld, workers need an effective grievance mechanism. For ordinary workers, this channel is already difficult to access; for refugees, it is almost non-existent. The platform classifies workers as "self-employed", they cannot access protections under labour law, are not covered by minimum wage protections, and have no occupational injury insurance or collective bargaining rights (OECD, 2018; ILO, 2021b). Refugees, therefore, face the same vulnerabilities as other platform workers, further compounded by the additional exclusion stemming from their refugee status.

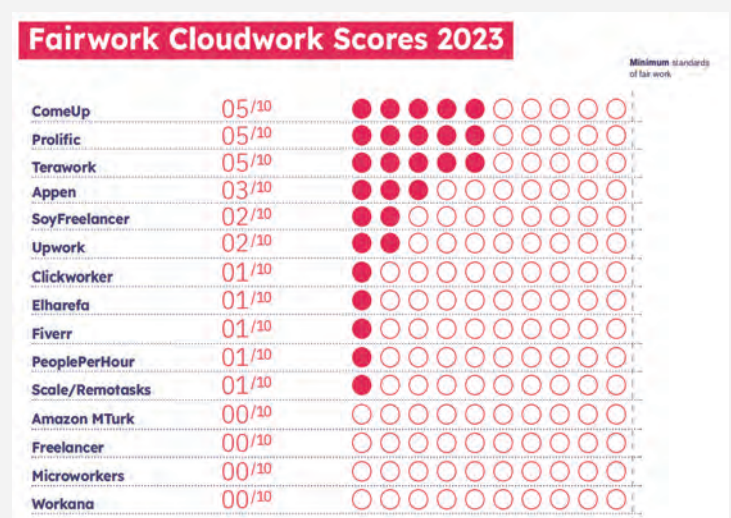
As refugee displacement becomes increasingly protracted, digital platforms risk shifting from tools of opportunity to mechanisms of exclusion without targeted policy interventions. This report examines the systematic lack of grievance and dispute resolution mechanisms for refugees on digital labour platforms, and argues that this governance gap is mainly reflected in three core issues: 1) automated identity verification is difficult to deal with complex cases; 2) insufficient multilingual support; 3) lack of legal and mediation mechanisms.

Background

Digital labour platforms provide refugees with employment channels that do not depend on local work permits. This is especially important for refugees whose access to formal employment is strictly restricted. They generally face legal restrictions on formal employment in the host country. In Jordan, Syrian refugees can only apply for work permits in specific industries, such as agriculture and construction (Hackl, 2021); in Turkey, approximately 2 million working-age Syrians reside in the country, but only about 62,370 hold formal work permits in 2020, accounting for about 3%. The vast majority of refugees struggle to enter the formal labour market (Bündnis für nachhaltige Textilien, 2022). Digital platforms have therefore become a practical alternative for many refugees to bypass these barriers.

Against this background, UNHCR, ILO and UNDP have jointly implemented the PROSPECTS programme since 2022, across eight countries, including Jordan, Uganda and Kenya, to improve the situation of refugees in the digital economy. In 2022, the gig economy accounted for about 12% of the global labour platform market (UNHCR Innovation, 2022; UNDP, ILO & UNHCR, 2024). Despite the continued expansion of digital labour platforms, the basic safeguards for refugees remain inadequate. The platform account is the primary means through which refugees participate in the digital economy, recording their work history, client ratings and reputation, and is also the only channel for income settlement. Once the account is suspended by platform algorithms, whether due to identity verification failure, client complaints, or system errors, refugees lose not only their jobs but also all income sources, as well as their work history and reputation.

International labour standards provide clear guidance on this issue. Fairwork's principles of fair platform work list transparent grievance mechanisms with manual intervention as the core standard of "fair management" (Fairwork, 2024). However, ratings indicate that this standard has hardly been implemented on mainstream platforms operating in refugee-hosting contexts. According to Fairwork's (2023) rating of 15 major digital labour platforms around the world, 11 platforms scored below 3 in "fair management", and 4 platforms scored zero across all indicators. This grievance dilemma faced by refugee workers is not an isolated issue but reflects the general inadequacy of the platforms' grievance mechanisms.



Note. From Work in the planetary labour market: Fairwork cloudwork ratings 2023 (p.11), by Fairwork, 2023, Oxford Internet Institute, University of Oxford.

Barriers to Entry: KYC Challenges for Refugees

Automated Know Your Customer (KYC) systems on mainstream platforms routinely reject refugee identity documents. Mainstream digital labour platforms such as Upwork and Fiverr require users to submit standard government-issued identity documents, usually national ID cards or passports with machine-readable features. Refugees often hold documents from UNHCR, family certificates, or OPM temporary protection papers. However, these documents often fail to meet platform KYC requirements (Hackl, 2021). Platforms systematically reject them because they lack barcodes, chip data, or standardised formats.

"I don't know where to take it to get help."

— GSMA, 2019, Female, Bidi Bidi refugee camp

A large number of refugees have lost or been unable to renew their legal identity documents during displacement, resulting in a lack of internationally recognised identity documents upon arrival in the host country. In Jordan, refugees must register with the UNHCR and obtain a Service Card to reside and access basic services legally. However, there is often a backlog in the refugee registration process, and many refugees are limited to temporary documents issued by OPM while awaiting official documents. This forces refugees to resort to high-risk coping strategies, such as using accounts registered under others' names, and when platforms conduct identity re-verification checks, these accounts often face sudden account suspension (Lenner & Turner, 2019).

Cases from Europe further reveal the harm this mechanism inflicts on refugees. In 2022, a foreign delivery worker who had worked in Paris for two years, completed over 6,000 deliveries, and maintained a 93% approval rating, was suspended following an identity verification check by Uber Eats on the grounds of "document fraud" for using an account registered under another person's name (InfoMigrants, 2022). Approximately 2,500 foreign delivery workers were deactivated for the same reason that year. These workers lost all their accumulated work and income, not due to poor work performance, but because they failed to meet the document format requirements of automated platform systems.

This obstacle directly affects refugees' access to grievance mechanisms. Most platforms' grievance systems requires users to have active accounts before they can initiate disputes. Once the account is blocked due to document-related issues, the user will lose access to grievance mechanisms. However, in the current market with a large population of refugees, the main platform has not yet established an alternative verification pathways or manual review mechanisms for certificates outside the standard format (Fairwork, 2023). While the EU's new Platform Work Directive now mandates human review for automated account blocking, no such regulatory framework exists in major refugee-hosting countries like Jordan and Turkey (Safeguard Global, 2024).

Lost in Translation: Language Barriers in Grievance Systems

English-based grievance systems on platforms like Upwork and Fiverr exclude refugees who speak Arabic, Pashto, or other languages (ILO, 2021a). In Bidi Bidi refugee camp, 59% of refugees require assistance from others when using platform services, and 25% are completely illiterate. Many refugees are unable to read English interfaces or understand platform rules and grievance procedures, making it difficult to file complaints or resolve issues when they encounter fee deductions and account issues (GSMA, 2019).

“We do not use SMS because we cannot read and write. Even when calling a child has to show us how to find the number.”

— GSMA, 2019, Female, Bidi Bidi refugee camp

Only 45% of the world's population has basic digital skills, and this proportion is significantly lower among refugees (UNHCR, 2023). Refugee workers are often unable to accurately understand lengthy English terms of service (ToS), inadvertently violating platform rules. Digital platform grievance processes are complex. They require refugees to complete screenshots, export records, and submit multiple forms. Faced with these demanding operations, many refugees simply abandon their efforts to seek redress after an account suspension (ILO, 2021a).



UNHCR / Swanson, W. (2019). Rohingya refugees receiving identity cards [Photograph].
<https://www.unhcr.ca/news/registration-gives-rohingya-refugees-identification-first-time/>

No One to Call: The Absence of Legal and Mediation Support

On digital labour platforms, refugee workers can neither rely on external mechanisms nor access legal remedies when they encounter account bans or income disputes. Complaining to the labour inspection agency, filing disputes through the arbitral tribunal, collective action through trade unions—these three mechanisms commonly available in traditional employment relations are not available to platform refugee workers.

The root of the problem lies in the legal status. Refugee workers are classified as independent contractors rather than employees, meaning that, in most host countries, they are not legally protected by labour law (OECD, 2018; ILO, 2021b). Neither Jordan nor Turkey has special legislation to regulate the platform grievance mechanisms. When refugee workers encounter income disputes or account issues, no institution is mandated to handle them under the current legal framework. Their legal status is constrained, and often face high cross-border mobility, making it difficult to access legal assistance or formal judicial procedures (Lenner & Turner, 2019).

Even if workers are willing to pursue legal channels, the practical obstacles remain significant. Legal aid resources are scarce in host countries. In Jordan, legal assistance to handle digital labour disputes is almost non-existent; in Turkey, the temporary protection status of Syrian refugees places them at the margins of judicial proceedings (Lenner & Turner, 2019). The cross-border nature of platform operations further increases litigation complexity. Platforms are often registered in the United States or Europe, making it difficult to determine which country's laws apply, and refugee workers lack the resources and capacity to pursue such claims.

Experience in the field of offline employment confirms the prevalence of this dilemma among refugee groups. In the Turkish manufacturing industry, Syrian refugee workers are often unable to file complaints through formal legal channels when they encounter wage arrears or poor working conditions, due to lack of legal support, complex procedures, and unfamiliarity with the system (Partnership for Sustainable Textiles, 2022). A similar situation also exists in digital platforms: when disputes cannot be resolved within the platform, workers lack any external mechanisms that can be referred. Most platforms have not established coordination mechanisms with public regulators or independent arbitration bodies (Fairwork, 2023). Any platform decision, whether it is account ban, income seizure or rating downgrade, is effectively a final decision for refugee workers. There is no appeal agency, no channel for review, and no organisation authorised to intervene.

Recommendations

1) Add Human Review

Upwork, Fiverr, Appen and other mainstream platforms should set up special manual review programs for refugee users as a supplement to the existing automated KYC system. The platform should clearly list UNHCR certification letters, family status certificates, and temporary protection certificates issued by OPM as valid acceptance documents, and provide a human review appeal process when the account is blocked for identity reasons, rather than relying solely on the automated system to make decisions. The European Union's Platform Work Directive (2024) has clearly requires that when automated system make major decisions, such as account blocking, it must be subject to human review by a qualified person (Safeguard Global, 2024). This standard should become a benchmark requirement for platforms operating in refugee areas worldwide, ensuring refugees' continued access to the platform and their basic ability to access grievance mechanisms.

2) Provide Language Support

UNHCR and ILO should integrate NGO-led complaint navigation support into their PROSPECTS digital livelihood project framework by drawing on the model of the MUDEM Worker Support Centre (WSC) (Open Supply Hub, 2022). The WSC in Turkey provides a mature reference model. Workers can submit complaints through a dedicated online platform in Arabic and other refugees' native languages. MUDEM case administrators will follow up and help formulate improvement plans (Bündnis für nachhaltige Textilien, 2022). This includes providing systematic multilingual support in the native language of refugees, such as complaint interface guidelines and simplified terms of service, and using visual process guides to reduce barriers to understanding the appeal process.

3) Enable Third-Party Mediation

Governments in Jordan, Turkey, and other refugee-hosting countries should establish regulatory requirements that digital labour platforms operating in the country provide basic grievance protections. Refugees with valid temporary documents must receive the same standard of protection as citizens. This should include clarifying the channels for submitting complaints, stipulating reasonable processing time limits, and providing written explanations on account restrictions or bans.

At the same time, independent assessment bodies such as Fairwork, should be introduced to participate in establishing a unified complaint evaluation framework and to regularly assess and publish the platform's complaint handling time, case response rate, and processing transparency. By openly comparing the performance of different platforms, reputational incentives can be used to encourage platforms to improve the appeal process (Fairwork, 2023).

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