

THE  
POLICY  
INITIATIVE

Policy Brief

**Lebanon’s “Missing Middle”:**  
Online Delivery Workers Under Precarious Conditions

---

Wassim Maktabi, Sami Zoughaib, and Carol Abi Ghanem

May 2022

## Lebanon's "Missing Middle": Online Delivery Workers Under Precarious Conditions

Wassim Maktabi, Sami Zoughaib, and Carol Abi Ghanem  
May 2022

In partnership with



International Development Research Centre  
Centre de recherches pour le développement international

"This work was carried out with the aid of a grant from the International Development Research Centre, Ottawa, Canada. The views expressed herein do not necessarily represent those of IDRC or its Board of Governors."



### Acknowledgements:

The authors gratefully acknowledge valuable feedback and contributions from Sami Atallah and Micheline Tobia.

### Disclaimer:

This study was completed between July and September 2021, before Zomato announced it would be suspending its operations in Lebanon.

## About the Authors

**Wassim Maktabi** is an Economist and Researcher at The Policy Initiative. His research interests include political economy, development economics, and public finance. He is currently working on projects focused on Lebanon's financial crisis, the pandemic, and public procurement. Previously, Wassim was a researcher at the Lebanese Center for Policy Studies where he mapped the legislative production of the government and parliament and co-authored the Government Monitor series. He also contributed to the conceptualization of a coding methodology to monitor the attention of policymakers, culminating in an automated legislation tracker. Wassim volunteered as a data officer at Open Map Lebanon and holds a BA in Economics from the American University of Beirut.

**Sami Zoughaib** is an Economist and Research Manager at The Policy Initiative. His research focuses on Lebanon's political economy, governance structures, macroeconomics, and local economic development. In addition to managing the research team, he also coordinates and conceptualizes TPI's research projects. Prior to joining TPI, Sami was a researcher at the Lebanese Center for Policy Studies, where he led and worked on several projects related to international donor conferences, parliamentary elections, and monitoring legislative production and reform. In addition to his affiliate platforms, Sami's research has been published in Governance, Economic Research Forum, openDemocracy, L'Orient-Le Jour, L'Orient Today, Annahar, and Al-Akhbar. Sami holds an M.A. in Public Policy from the University of Reading and a B.A. in Economics from the American University of Beirut.

**Carol Abi Ghanem** is a Social Psychologist and Research Manager at The Policy Initiative. Her main focus at TPI is social protection of vulnerable communities, strengthening the capacities of local communities, harvesting alternative narratives and leading participatory research projects and policy interventions. Previously, Carol was a research manager and communication specialist at the Lebanese Center for Policy Studies, looking at youth identities, politics and economic navigation, alongside working on social justice issues, community development and political mobilization. Moreover, Carol has years of experience in intersectional feminist advocacy, women's rights movements and community mobilization. Carol is a holder of an MA in Social and Political Psychology from the American University of Beirut.

## Abstract

The COVID-19 pandemic disrupted economic activity and labor markets around the world and proved the need for better and more inclusive social protection systems. In Lebanon, the national social protection system is fragmented and leaves populations excluded such as platform-based delivery workers who played an essential role during the pandemic. This policy brief demonstrates that platform-based workers fall right within a category of people excluded from social protection, known as the "missing middle", which impedes their access to social insurance, social safety nets, and relief interventions provided during the pandemic. The brief sheds light on the legal employment status of platform-based workers in Lebanon and their precarious labor conditions. The case of online delivery workers in Lebanon echoes the need for a universal social protection floor and a revision of the Lebanese labor code to guarantee the rights of emerging employment statuses.

## I. Introduction

The COVID-19 pandemic disrupted economic activity and threatened people's wellbeing around the world. Its adverse economic effects have had a severe spillover on labor markets, with an estimated 144 million jobs lost globally, as of January 2021.<sup>1</sup> However, contrary to the negative shock witnessed by traditional workplaces, a recent cross-country study found that the demand for and supply of freelance work has significantly increased during the pandemic<sup>2</sup>. Indeed, economic hardship and uncertainty about the future push people outside of traditional employment and into alternative labor structures—a concept known as “recession-push.”<sup>3</sup>

Dubbed the “gig” economy, this emerging alternative labor market is based on short-term commitments that are performed by independent contractors or freelancers on an on-demand basis. One of the main components of this economy is platform-based work, a transformation of labor characterized by one of two features: Crowdsourcing micro-tasks online or matching a person who provides a manual service with a client through an online application.<sup>4</sup> Despite the apparent flourishing of this market during the pandemic, it has proven to be precarious, as it is largely temporary and unstable.<sup>5</sup>

In Lebanon, the labor market has sustained multiple severe shocks over the past two years. First, the financial sector collapsed in 2019 causing a major financial and economic crisis that severely disrupted the country's markets. Second, the pandemic hit Lebanon in March 2020 and further exacerbated the situation, bringing the economy to a near full-paralysis. As a result, the national output nearly halved and unemployment figures have increased alarmingly, with recent estimates standing at 43%.<sup>6</sup> Given the increased precariousness of Lebanon's labor market, the gig economy presented itself as a viable destination for the workforce, particularly amid an increase in demand for freelancers and platform-based jobs.<sup>7</sup>

While it has been confirmed in other countries that platform-based workers sustain vulnerabilities due to the nature of their work,<sup>8</sup> the case remains understudied in Lebanon. This policy brief sheds light on this category of workers in the current crisis environment, with a focus on their access to social protection. This is particularly important given Lebanon's social protection system that gives way to major exclusions, resulting in what is known as the “missing middle.”<sup>9</sup> This category represents a segment of the population, which platform-based workers fall right within, that cannot access social insurance for not having an “employee” status and cannot access safety net programs for not being poor enough.

This policy brief is divided into five main sections. The first section defines the typology of the gig economy and highlights the category of workers that are of interest to this research. The second section describes the methodology of the interviews conducted with key experts and workers of interest. The third section assesses the legal framework governing gig workers in Lebanon and its effects on workers' access to social protection. Moreover, this section evaluates the efficacy of interventions made by the state in protecting these workers during the pandemic. The fourth section looks into the rights and obligations of platform-based workers towards hiring platforms, as well as the latter's interventions during the pandemic. Finally, the fifth section proposes policy recommendations that aim to guarantee gig workers their rights and livelihoods during the pandemic and after it.

## II. Typology of the gig economy

The gig economy is a hybrid market that consists of non-standard forms of work arrangements, including agency work, on-demand work, self-employed, and informal or undeclared work, that exhibit different degrees of precariousness.<sup>10</sup> The gig economy can thus be either formal or informal, depending on the contractual arrangement between the service provider and the client, and whether the generated income is declared for taxation. For platform-based labor, work is formalized through a contractual arrangement and the authorization of tax deductions.

This policy brief adopts a classification for gig work determined by two axes: The locality of the labor market and the degree of control exercised by the platforms themselves.<sup>11</sup>

<sup>1</sup> International Labor Organization. January 2021. “COVID-19 and the World of Work.” ILO Monitor, seventh edition.

<sup>2</sup> Umar, M., Y. Xu, and S. Mirza. 2020. “The Impact of Covid-19 on the Gig Economy.” Economic Research-Ekonomska Istraživanja

<sup>3</sup> Congregado, E., et al. 2011. “The Recession-Push Hypothesis Reconsidered.” SSRN Electronic Journal.

<sup>4</sup> Messenger, J. 2018. “Working Time and the Future of Work.” International Labor Organization.

<sup>5</sup> European Parliament. 2020. “The Platform Economy and Precarious Work”; and Woodcock, J. 2019. “The Gig Economy: A Critical Introduction.”

<sup>6</sup> World Food Program. April 2021. “Lebanon m-VAM Vulnerability and Food Security Assessment.” World Bank Group; and World Bank. 2021. “Lebanon Sinking to the Top 3.” Lebanon Economic Monitor.

<sup>7</sup> Ibid.

<sup>8</sup> European Parliament. 2020. “The Platform Economy and Precarious Work.”

<sup>9</sup> International Labor Organization and UNICEF. 2021. “Towards a Social Protection-Floor for Lebanon.”

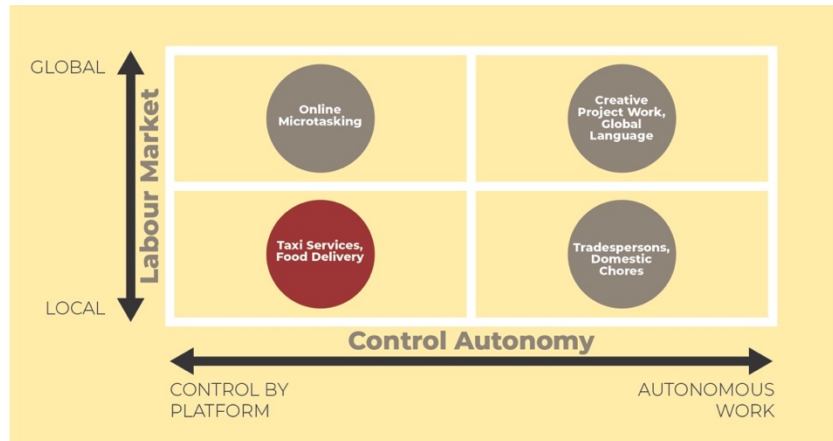
<sup>10</sup> Ibid; International Labor Organization. “Non-Standard Forms of Employment.”

<sup>11</sup> European Parliament. 2017. “The Social Protection of Workers in the Platform Economy.”

The locality of the labor market is defined by whether the task should be completed physically or could be done online. This is an important variable in the case of the pandemic as workers who need to be on the frontline to complete their tasks are more vulnerable to infection than their peers who can work remotely.<sup>12</sup>

The degree of control that platforms exercise over the conduct of work, known as the control-autonomy axis, presents a crucial differentiation relevant to social protection even outside of the pandemic context. In fact, the element of control is an essential factor in determining the legal status of an employee compared to that of an independent worker.<sup>13</sup> The degree of worker autonomy is a spectrum and differs significantly between platform-based delivery work and trade work, with the former exhibiting high control by the hiring platform over the worker, while the latter benefits from being purely at the discretion of the worker.<sup>14</sup>

**Figure 1: Typology of gig labor**



Sources: European Parliament, 2017. *The Social Protection of Workers in the Platform Economy*.

With this typology in mind, this policy brief focuses on platform-based delivery workers who are restricted by locality and have little control over their work. These workers suffer precarious labor conditions, as they have limited access to social protection and fringe benefits given their employment status, and were frontline workers during the pandemic.

### III. Methodology

Experts and workers were interviewed to get a better assessment of platform-based delivery workers' labor conditions and the legal framework governing them. The interviews were conducted between July and September 2021 and served to complement the study's findings. Given that the two platform businesses picked for this study have their terms and conditions with delivery workers accessible publicly, representatives of the companies were not interviewed. The following section details the interviews' objectives and process by which they were conducted.

#### A. Interviews with experts

The objective of the interviews with experts was to understand online delivery workers' rights and struggles from the legal and social aspects. For that, three interviews were conducted: One with a legal expert and two with social protection experts. The interviews were done virtually and followed a semi-structured format.

#### B. Interviews with workers

The objective of the interviews with online delivery workers was to assess the extent to which they have access to state social protection schemes and fringe benefits provided by their hiring platforms, Zomato and Toters.<sup>15</sup> For that, interviews were conducted with online delivery workers, and the participants were randomly selected through the platforms' online delivery algorithms. The interviews were done in person in Beirut and followed a structured format using a questionnaire of 20 questions. Participants were informed that they are free to refuse to answer any question(s) and/or stop the interview at any time. The participants were also informed that their participation would be both anonymous and confidential.

<sup>12</sup> A microtask is a form of crowdsourcing work online, where the work is short in duration and is done remotely through a computer. Examples include translation and transcription, data collection, and image identification.

<sup>13</sup> Ibid; International Labor Organization. 2003. "The Scope of the Employment Relationship." International Labor Conference, 91st session.

<sup>14</sup> European Parliament. "The Social Protection of Workers in the Platform Economy."

<sup>15</sup> Zomato and Toters are arguably the two leading platforms for online delivery services in Lebanon. Zomato is an Indian company founded in 2008 and today operates in more than 20 countries, including the United Kingdom, Turkey, New Zealand, and the United Arab Emirates. Toters is relatively a new start-up, established in 2017 in Lebanon, but has scaled-up quickly to recruit more than 1,500 delivery workers in the country. Toters also operates in Iraq.

**The questionnaire was comprised of four parts:**

- 1) The worker's background, which contains questions on the worker's nationality, duration of time working with the platform, and the length of their daily shifts.
- 2) The access to formal social protection, which contains questions on whether the worker is registered in the country's social security or poverty-targeting schemes, and the relief plans introduced during the pandemic.
- 3) The contractual relationship, which contains questions on the obligations of the worker toward the platform, such as the number of required delivery order completions and workers' code of conduct.
- 4) The access to fringe benefits, which contains questions on whether the worker is included in benefits that employees at platform companies receive, such as health insurance and compensated sick leaves, as well as compensations and awareness campaigns related to the pandemic.

## IV. Legal framework of platform-based workers

This section assesses the legal framework that defines the employment status of platform-based workers and its effects on their access to formal social protection. The assessment is based on a review of the work agreements between workers and Zomato and Toters, as well as the legal texts that regulate employment in Lebanon. The section first evaluates the employment status of workers and benchmarks it with the obligations of their job. Second, it explains how this legal framework affects platform-based workers' access, or lack thereof, to Lebanon's existing formal social protection schemes and new ones introduced during the pandemic.

### A. Employment status

The Lebanese private sector employment is regulated by the Labor Code which secures the rights of employees and employers by outlining their entitlements and obligations in the workspace.<sup>16</sup> However, the law's provisions do not encompass all types of workers,<sup>17</sup> as it particularly excludes domestic workers and workers in some forms of family businesses and agricultural unions, among others. Moreover, the code does not mention independent workers who represent a significant portion of the country's labor force, excluding them without even validating their existence.<sup>18</sup> Instead, independent workers or contractors are governed by the Code of Obligations and Contracts, which entails a contract stipulating a "materially possible" task and compensation, and the Income-Tax Legislative Decree, which requests them to declare their annual earnings.<sup>19</sup>

Based on the review of the work agreements of Zomato and Toters, the legal capacity under which platform-based workers provide delivery services is that of an independent worker. Before starting to work, platform-based workers agree to a consultancy agreement with these companies which explicitly considers them as independent contractors and not employees (table 1).

**Table 1: Sample of terms and agreements by platform**

Zomato	Toters
"The Delivery Partner [platform-based delivery worker] is an independent business contractor [...] It is clearly understood and agreed that under [these terms and conditions] no relationship of employer and employee exists between Zomato and Delivery Partner."	"You [platform-based delivery worker] are offering delivery services (the "Delivery Services") to the Company on a "freelance" basis [...]. You hereby agree that you will be acting as an independent service provider in the performance of the Delivery Services"

Sources: Zomato Delivery Partner Terms and Conditions; and Toters Riders Terms and Conditions.

The fundamental legal difference between a consultancy or freelance agreement and an employment one is that the latter includes a "relationship of subordination", or "علاقة تبعية" which gives authority to the employer to exercise supervision over and give instructions to the wage-earner.<sup>20</sup> In the case of platform-based workers, the terms of conditions agreed with the employers include elements of subordination, suggesting that the "independent" or "freelancer" status of this segment of workers is unfounded and should be revisited (table 2).

As explained by a circular issued by the Ministry of Finance in 2002, elements of subordination are clustered into legal and economic components. The text defines the legal component as administrative and technical regulations

<sup>16</sup> Leaders for Sustainable Development. 2019. "The Labour Sector in Lebanon: Legal Frameworks, Challenges, and Opportunities."

<sup>17</sup> See Lebanese Labor Code (1946) Article 7.

<sup>18</sup> Central Administration of Statistics and International Labor Organization. 2019. "Labor Force and Household Living Conditions Survey 2018-2019."

<sup>19</sup> Code of Contracts and Obligations (1932); and Legislative Decree 144/1959, Income-Tax Law.

<sup>20</sup> Based on a semi-structured interview with a legal expert. This is also validated through: Leaders for Sustainable Development. 2019. "The Labour Sector in Lebanon: Legal Frameworks, Challenges, and Opportunities."

that govern the worker-employer relationship, and the economic component as the worker's financial dependency on the work as well as the employer's financial responsibilities toward their business <sup>21</sup>.

In table 2, the elements of subordination outlined in the legal text are benchmarked with the work agreements platform-based workers agree to with hiring platforms. The observations made are further validated by the interviews with workers and experts.

**Table 2: Elements of subordination between platform-based workers in Lebanon and hiring platforms**

Subordinate Relationship Components		ZOMATO	TOTERS
Legal Subordination	The existence of a written or oral work contract	YES	YES
	The employer ensure that work is continuous	Work depends on platform users submitting orders	Work depends on platform users submitting orders
	The employer is required to complete the work assigned to him/her personally, and is not allowed to assign or employ another person to complete the work	YES	YES
	The employer has the authority to manage and supervise how the employee performs work. The employer also has a right to give instructions regarding how to do the work, without the right of the employee to discuss work methods. *	YES **	YES ***
	The employer determines the tasks the employee has to perform	YES	YES
	The employer determines the where and when the task is to be done	YES	YES
	The employee is obligated to comply with working hours specified by the employer and does not have the right to amend them on his own	need to complete a predetermined number of orders per month	need to complete a predetermined number of orders per week
	Work can be full-time, part-time temporary, seasonal, or for a training period	YES	YES
	The employer can put the employee through training programs	YES	YES
	The employer has the exclusive right to employ, train, and supervise persons who assist in carrying out work	YES	YES
Economic Subordination	The salary or wage is to be paid by the employer periodically, or monthly, or weekly, or daily, or on an output basis	order basis + hourly fee	order basis
	The employee can benefit from overtime compensation, bonuses, and social assistance packages, among others	adopts a reward system for workers that consistently surpass minimum order requirements	adopts a reward system for workers that consistently surpass minimum order requirements
	The employee shall be reimbursed by the employer for all expenses incurred by him/her related to the execution of the work	NO	NO
	To complete the work, the employer shall use equipment that belongs to the establishment in which he/she works	Work depends on platform users submitting orders	Work depends on platform users submitting orders

Sources: Ministry of Finance Ministerial Circular #2539/بص، Zomato Delivery Partner Terms and Conditions; Toters Riders Terms and Conditions; and interviews with platform-based delivery drivers. Note: \* The legal text notes that a subordinate relationship can still exist regardless of whether the employer exercises their right mentioned in this component. \*\* Clause 9.2 (ii) of Zomato Delivery Partner Terms and Conditions mentions that "[Zomato] shall not exercise operational supervision on the activities of the [platform-based worker]". However, interviews with platform-based workers indicate that the company does indeed monitor and supervise work through tracking hours worked, orders completed, availability status, and location. \*\*\* Toters Riders Terms and Conditions do not explicitly mention this; however, interviews with platform-based workers indicate that the company monitors and supervises work through tracking hours worked, orders completed, availability status, and location.

<sup>21</sup> Ministry of Finance. 2002. "المتعلقة بتحديد العلاقة التعاقدية بين الأجير وصاحب العمل (قانون ضريبة الدخل) 44. تحديد أصول تطبيق أحكام الباب الثاني من المرسوم الاشتراعي رقم 2539/بص". Ministerial Circular #2539/



## B. Access to social protection

The existing legal framework for platform-based workers in Lebanon significantly restricts their enrollment in the social protection system, which is largely tied to formal employment or targets the extreme poor. The following subsections assess the access of platform-based workers to social insurance and social safety nets provided by the state, as well as relief interventions introduced during the pandemic.

### Access to social insurance

The country's social insurance fund, the National Social Security Fund (NSSF), includes three branches: Sickness and maternity, family compensation, and end-of-service indemnity, with access to these benefits tied to formal traditional labor or unionized liberal professions<sup>22</sup>. As for independent workers, the NSSF law restricts their access only to a voluntary enrollment in the health insurance scheme with a monthly contribution of LBP 90,000.<sup>23</sup> This scheme, however, is not accessible to non-Lebanese independent workers who, despite lacking data disaggregated by nationality, constitute a significant portion of platform-based labor.<sup>24</sup> As a result, at least 53% of the population in Lebanon in 2015 was not covered by any type of social insurance, and 50% of independent workers were not interested in the voluntary enrollment.<sup>25</sup> This can be explained by the fact that people covered by the NSSF regularly face bureaucratic difficulties when seeking to be reimbursed, with the fund's finances increasingly threatened by the depreciation of the local currency and the government's inability to settle arrears.<sup>26</sup>

As such, platform-based workers cannot legally access benefits beyond the limited voluntary NSSF scheme, which does not include family allowances, end-of-service indemnities, and maternity leaves, while other non-Lebanese workers are completely excluded from public social insurance.

### Access to social safety nets

Lebanon's social safety programs are limited in capacity compared to international standards and significantly lower than the average for countries in the MENA region.<sup>27</sup> The country's social safety nets consist of targeted welfare services, including to poor households, disabled and elderly populations, and a de-facto non-targeted subsidy of essential commodities, such as bread, fuel, and medications through exchange-rate ceilings.<sup>28</sup> This price control, however, has proven to be unsustainable due to the inability of the country's central bank to provide credit lines in foreign currency to importers as of August 2021,<sup>29</sup> further burdening platform-based workers with increased fixed costs. An interview with a delivery worker at Toters shows the difficult trade-offs they faced when fuel hoarding and panic-buying were prevalent:<sup>30</sup> "I wake up at 6 AM and waste at least two hours of my day in agony trying to fill my motorcycle. I have to, otherwise I cannot work. Sometimes I have to fill my motorcycle mid-day, which makes me lose potential income."

Lebanon's only poverty-targeting assistance scheme, the National Poverty Targeting Program (NPTP), is accessible only to the poorest Lebanese households. The selection of beneficiaries is based on a study of household characteristics, including family size and income, employment status, and household expenditure, among others. Interviewed platform-based workers stated they have neither applied nor heard of any delivery worker who has applied for the state's poverty-targeting scheme.<sup>31</sup> It is likely that platform-based workers do not meet the eligibility criteria set by NPTP as they are simply not poor enough and get paid higher than their peers in traditional employment.<sup>32</sup> Foreign workers are also excluded from the state's poverty-targeting program. Instead, Palestinian and Syrian workers, who could represent a significant portion of platform-based workers, are eligible for poverty-alleviation programs through non-state actors like UNRWA and UNHCR.<sup>33</sup>

Platform-based workers can access services limited to hospitalization waivers offered by the Ministry of Public Health and education enrollment waivers provided by the Ministry of Education and Higher Education. However, the provision of such services is often discretionary in the hands of public administrations and largely driven by clientelist motives.<sup>34</sup>

<sup>22</sup> Lebanon Support. 2020. "Social Protection in Lebanon: The National Social Security Fund."

<sup>23</sup> National Social Security Law (1963) Article 11; Decree #7352 (2002) Article 3.

<sup>24</sup> International Labor Organization. 2021. "Digital Refugee Livelihoods and Decent Work: Towards Inclusion in a Fairer Digital Economy."

<sup>25</sup> Karam, A., G. Zureiqat, and N. Rammal. 2015. "Social Protection and Safety Nets in Lebanon." Institute of Development Studies and World Food Program; Lebanon Support. 2021. "Towards Universality: The National Social Security Fund (NSSF) Voluntary Health Insurance."

<sup>26</sup> National Social Security Fund. October 2020. "سلفة للمستشفيات هي ضمانة لحق المضمونين بالاستشفاء ومطالبة الدولة بتسديد ديونها لتجنب كارثة اجتماعية في البلاد."

<sup>27</sup> International Monetary Fund. 2012. "Poverty, Social Safety Net, and Subsidies in Lebanon."

<sup>28</sup> Bastagli, F., R. Holmes, and R. Jawad. 2019. "Social Protection in Lebanon: A Review of Social Assistance." Overseas Development Institute.

<sup>29</sup> Reuters. August 2021. "Lebanese Central Bank Effectively Ends Fuel Subsidy." Reuters.

<sup>30</sup> Azar, G. May 2021. "Delayed Payments, Panic Buying and Hoarding Lengthen Lines at Gas Stations Across the Country." L'Orient Today.

<sup>31</sup> Based on the findings of 12 structured interviews with platform-based delivery workers at Zomato and Toters.

<sup>32</sup> Toters. August 2021. "A Message from the Founders of Toters"; and International Labor Organization. 2021. "World Employment and Social Outlook: The Role of Digital Labour Platforms in Transforming the World of Work."

<sup>33</sup> International Labor Organization. "Digital Refugee Livelihoods and Decent Work: Towards Inclusion in a Fairer Digital Economy; UNRWA. April 2021." UNRWA Raises Alarm on the Situation of Palestinian Refugees in Lebanon"; and UNHCR. February 2021. "VASYSR 2020 - Vulnerability Assessment of Syrian Refugees in Lebanon."

<sup>34</sup> Leenders, R. 2012. "Spoils of Truce: Corruption and State-Building in Postwar Lebanon" Cornell University Press.

### Access to state interventions during the pandemic

One month before the pandemic in February 2020, the Lebanese parliament passed an austerity budget that significantly curbed expenditures on social services compared to the previous year.<sup>35</sup> The government's social and economic interventions over the course of the pandemic constituted a modest 1.7% of GDP, lower than the average in similar middle-income countries.<sup>36</sup>

The major socioeconomic intervention that the Lebanese government launched was the National Social Solidarity Program, a cash assistance program which entailed a direct cash transfer done on a monthly basis over six rounds.<sup>37</sup> The program aimed to distribute LBP 400,000, or \$100 at the parallel market rate at the time, for 187,500 households, of which 150,000 are lower-income households listed in the NPTP and IMPACT databases.<sup>38</sup> The remaining 37,500 households included healthcare workers, taxi and bus drivers, and victims of landmines. Aside from its financial limitations, the program was hurdled by administrative procedures and political interference which led to only four of the promised cash transfers to be made, none of which targeted platform-based delivery workers.

Moreover, while the government exempted all food and pharmaceutical delivery workers from lockdown restrictions, it failed to introduce a tailored social protection measure to ensure their safety. In fact, during the lockdown between January and February 2021,<sup>39</sup> when Lebanon was registering record-high COVID-19 cases with alarming positivity rates,<sup>40</sup> platform-based delivery workers were allowed to work normally. In parallel, the government failed to compensate or incentivize their work during this time, thus leaving the livelihoods and security of this segment of workers at the discretion of hiring platforms.

## V. Benefits provided by hiring platforms

Beyond access to government benefits and interventions, this section assesses the inclusion of platform-based workers in benefit schemes provided by hiring platforms, and the changes in workers' labor conditions during the pandemic. First, the section evaluates the types of benefits, such as health insurance and compensated sick leaves, that hiring platforms offer to their delivery workers. Second, it outlines the new measures that those platforms introduced during the pandemic to protect their workers' livelihoods. For this, the section relies on a review of platforms' terms and agreements, findings derived from interviews conducted with drivers at Zomato and Toters, and a study that the International Labor Organization has conducted on digital labor platforms.<sup>41</sup>

### A. Benefits granted in work agreements

As shown above, platform-based workers are neither entitled to formal social protection schemes nor are they protected by the labor code. This places their livelihoods and welfare at the full discretion of hiring platforms. Based on the terms and conditions published online by Zomato and Toters, delivery workers are explicitly excluded from existing or potential employment benefits, meaning they are not entitled to health insurance, vacation, and severance pay, among other fringe benefits (table 3).

**Table 3: Access to employee benefits**

Zomato	Toters
"The [platform-based worker] shall not have any claim for permanent employment or employment benefits under any statutes / local laws"	"You [platform-based worker] will not be eligible for, and will not participate in, any employee pension, health, welfare, or other fringe benefit plan of the Company"

Sources: Zomato Delivery Partner Terms and Conditions; Toters Riders Terms and Conditions; and interviews with platform-based delivery drivers.

Injury reimbursement for delivery workers is not granted in any of the platforms' terms of agreements. In fact, Zomato clearly mentions in its terms that delivery workers are not entitled to hospitalization coverage even if an accident occurs while rendering delivery services, while Toters' terms do not mention health insurance in general. Still, interviewed drivers claim that they are, in practice, entitled to healthcare coverage if an accident occurs while working, assuming the driver was wearing the uniform and a helmet, and driving legally (table 4).<sup>42</sup> However, the

<sup>35</sup> Ministry of Finance and Institut des Finances Basil Fuleihan. 2020. "Citizen Budget 2020."

<sup>36</sup> UN-ESCWA. 2020. "COVID-19 Stimulus Tracker: Global Observatory on Social Protection and Economic Policy Responses."

<sup>37</sup> Due to changes in the breakdown of costs, the program now covers five rounds of cash transfers instead of six.

<sup>38</sup> IMPACT is an open-data initiative managed by the Central Inspection, and Lebanon's first e-government platform. It launched a household assessment form in April 2020 where municipalities can fill the information of residents requiring aid. More than 460,000 applications were filled in two months.

<sup>39</sup> Ministry of Interior and Municipalities. January 2021. "Ministerial Decision #26."

<sup>40</sup> Data extracted from Lebanon's Disaster Risk Management Unit.

<sup>41</sup> International Labor Organization. "World Employment and Social Outlook: The Role of Digital Labour Platforms in Transforming the World of Work."

<sup>42</sup> Driving legally entails: Having a driver's license, a registered vehicle, and driving according to traffic regulations

failure of companies to outline the right to access healthcare coverage in the work agreement strips workers of bargaining power, thus giving platforms the ability to provide coverage on a case-by-case basis.

**Table 4: Access to injury coverage**

Injury Compensation	ZOMATO	TOTERS
According to Terms and Conditions	The [platform-based worker] is not entitled to claim reimbursement of hospitalization / hospital bills that may be incurred by [him/her] while rendering Delivery Services [...] for any unfortunate accidents or severe illness, during the subsistence of [this agreement]."	N/A
According to interviewed workers	Only if an accident occurred during delivery, and the worker was wearing the Zomato uniform and following traffic regulations.	Only if an accident occurred during delivery, and the worker was wearing the Toters uniform and following traffic regulations.

Sources: Zomato Delivery Partner Terms and Conditions; Toters Riders Terms and Conditions; and interviews with platform-based delivery drivers.

The terms of agreements of both platforms also fail to entitle their drivers to compensated sick leaves. Drivers at Toters confirmed that this was indeed the case when asked whether they receive some sort of compensation for being unable to work, provided they submit a doctor's note (table 5). However, responses of delivery workers at Zomato were split between those who think they get compensated for the number of days they are unable to work for a medical reason, and those who do not think so. This reaffirms workers' lack of awareness to provisions of hiring platforms, and hints at the existence of an information asymmetry not only between workers and platforms, but also within the workers themselves.<sup>43</sup>

**Table 5: Access to compensated sick leaves**

Compensated Sick Leave	ZOMATO	TOTERS
According to Terms and Conditions	N/A	N/A
According to interviewed workers	"I heard that if you submit a medical excuse, the company will compensate you for the days you couldn't work."	"There is no compensation for whatever reason. If you miss work, it's on you."

Source: Zomato Delivery Partner Terms and Conditions; Toters Riders Terms and Conditions; and interviews with platform-based delivery drivers.

## B. Protection during the pandemic

In Lebanon, similar to many other countries, platform-based delivery workers were among frontline workers excluded from lockdown strategies adopted throughout the pandemic. As households relied more on delivery services during lockdowns, platforms such as Zomato and Toters significantly expanded in market reach and revenue.<sup>44</sup> This subsection explores, through interviews with platform-based delivery workers at both companies, the extent to which hiring platforms took exceptional interventions to secure the safety of their drivers. More specifically, three proxy interventions are investigated: Access to COVID-19 compensation, masks and sanitizing equipment, and awareness campaigns and moral support.

### COVID-19 compensation

The pandemic exposed the insufficiency of protection extended to workers with non-standard forms of employment.<sup>45</sup> In fact, Zomato, which is an Indian company, was found to have the worst working conditions among digital labor platforms back home last year.<sup>46</sup> This prompted the company to scale-up the protection of their delivery workers by establishing the "Rider Relief Fund," which raises funds to support delivery workers whose earnings dropped, and a "COVID Insurance" that compensates them in case they were infected.<sup>47</sup> In Lebanon, interviewed Zomato-based delivery workers were oblivious to these initiatives. However, according to a driver, one can indeed be compensated for the number of days they spend at home due to a COVID-19 infection, or any other medical reason, given they provide a medical report.

<sup>43</sup> International Labor Organization. "World Employment and Social Outlook: The Role of Digital Labour Platforms in Transforming the World of Work"; and Choudary, S. 2018. "The architecture of digital labour platforms: Policy recommendations on platform design for worker well-being." International Labor Organization.

<sup>44</sup> Thomas, A. December 2020. "The Year that Was: Tamim Khalfa, Co-Founder and CEO, Toters." Entrepreneur Middle East; and Alawadhi, N. and P. Abrar. April 2021. "Zomato's Revenue from Operations Doubles to Rs 2,604 cr Amid Pandemic." Business Standard.

<sup>45</sup> International Labor Organization. May 2020. "Social Protection Spotlight."

<sup>46</sup> Fairwork. 2020. "Fairwork India Ratings 2020: Labour Standards in the Platform Economy."

<sup>47</sup> Goyal, D. April 2020. "Summary of all of Zomato's COVID-19 Related Initiatives." Zomato.

There was no public information available regarding the interventions undertaken by Toters to protect the livelihoods of workers. Even interviewed delivery workers claimed that they had no access to, nor have they heard of, any past or existing COVID-19 compensation plan. Two say that the company seldom takes initiatives for the betterment of platform-based workers, and that drivers have to demand for changes themselves. During an interview, a platform-based delivery worker at Toters said:

"[Toters] didn't offer us compensation for COVID or for fuel or anything. To them, we are easily replaceable because there are a lot of workers. If it weren't for drivers protesting and demanding an increase for our delivery fee, the company would have kept it at LBP 3,000."<sup>48</sup>

### **Access to masks and sanitizing equipment**

Based on the interviews conducted, workers across platforms confirm that they had received access to COVID-19 protection kits, namely masks and sanitizers, during the initial stage of the pandemic only. Workers from both platforms say they are requested to wear masks when collecting and delivering items, and are warned or risk being penalized over not wearing one. During the lockdown enforced in early 2021, interviewed workers stated that the companies did not provide masks. Drivers had to purchase the masks themselves and incur their cost: "I have been working with Zomato for almost a year and they never gave me a mask, but they requested that I wear one. It's too costly for them to provide masks for everyone," said a platform-based delivery worker at Zomato. According to some drivers, a possible explanation for that is the depreciation of the local currency. This was stated by a worker at Toters: "They provided me with a mask and a sanitizer when I first started working up until the Lebanese lira significantly depreciated. Ever since, we are requested to buy our own masks."

### **Access to awareness campaign and moral support**

Awareness campaigns on COVID-19 precautions and the vaccination rollout were scarce across platforms. Zomato workers indicate that they had seen precautionary visuals on their application platform that encouraged them to wear their masks and keep a safe distance. Moreover, Zomato launched a free COVID-19 vaccination drive for its delivery workers in India,<sup>49</sup> but in Lebanon, the company simply informed drivers about the importance and benefits of getting vaccinated. On the other hand, interviewed drivers at Toters say they did not receive any type of awareness.

The pandemic has added significant stress on frontline workers' mental health. Yet this and the importance of moral support in the workspace remain overlooked, particularly in developing countries. Interviewed delivery workers at Zomato and Toters say they had no access to moral support throughout the pandemic.

## **VI. Policy recommendations**

This policy brief sheds light on a significant portion of the Lebanese labor force that has so far been understudied and provides a first look into the vulnerabilities they face. While the analysis provided has significant limitations, due to the lack of data on app-based workers in the country and the small sample of interviews conducted, it hints at important policy implications:

### **The increasing need of social protection floor**

The Lebanese government should lead a concerted effort toward an inclusive social protection framework starting with a social protection floor that guarantees access to the "missing middle." The details of this policy proposal have already been presented in the ILO-UNICEF report "Towards a Social Protection Floor for Lebanon," which outlines policy options for core life-cycle social grants.<sup>50</sup> A social protection floor would guarantee the livelihood and dignity of vulnerable communities, including platform-based workers, particularly during times of crisis such as the pandemic and the current economic meltdown.

### **A review of the Lebanese Labor Code**

There is a strong case to be made against the current "independent worker" status of platform-based workers, particularly in light of the elements of subordination that define this type of work. To this end, the Lebanese Labor Code has to be revisited, with the modern transformation and digitalization of work, to guarantee the rights of workers within a new modern classification of work statuses.

### **Worker representation to counter power-asymmetry**

The unionization process in Lebanon, which still requires a permit from the Lebanese government, has to be amended to give workers the right of collective action and bargaining and to balance out the power dynamic with hiring companies. This is particularly important to platform-based workers, given the high level of control exercised by platforms on workers, and the latter's current inability to meet and organize.

---

<sup>48</sup> Note that up until June 2021, the delivery charge at Toters stood at LBP 3,000, or less than \$0.5 at the parallel market rate at the time.

<sup>49</sup> Singh, J. May 2021. "Zomato, Swiggy Kick Off COVID-19 Vaccination Drive for Their Delivery Partners." Gadgets 360.

<sup>50</sup> International Labor Organization and UNICEF. "Towards a Social Protection-Floor for Lebanon."

**THE  
POLICY  
INITIATIVE**

The Policy Initiative, a Beirut based think tank which was established in February 2021, aims to inform the public, engage key stakeholders, and empower local communities through shaping policies, incentives and behaviors of state and societal actors.

---

**[www.thepolicyinitiative.org](http://www.thepolicyinitiative.org)**

Sadat Tower, 4th floor, Leon Street, Ras Beirut, Lebanon. Telephone: +961 1 790084 | +961 1 786441  
email: [info@thepolicyinitiative.org](mailto:info@thepolicyinitiative.org)