

Work Package 2 – Deliverable 4

COMPARATIVE ANALYSIS OF NATIONAL REPORTS ON INDUSTRIAL RELATIONS

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Organizing invisible work?

The organization of domestic care and service work within industrial relations systems in Europe

1. Introduction

The domestic care and service sector is one of the oldest sectors of the economy. It includes workers who provide services to people within their own homes, such as long- and short-term care, as well as domestic tasks like cleaning, grocery shopping, and gardening (Murphy et al., 2022). A key defining feature of this sector is the location of the work. Due to societal trends such as aging populations and the rise of dual-earner families in European countries, the sector has gained importance and continues to grow (Estévez-Abe & Hobson, 2015; Razavi & Staab, 2010). Moreover, in countries that have adopted strategies to deinstitutionalize care and encourage people to live longer in their own homes, the domestic care and service sector has become a significant part of the care system. At the same time, as many governments have shifted from in-kind provision of services to private procurement, the importance of both family care and market-based provision has increased (Estévez-Abe & Hobson, 2015; Simonazzi, 2008). Although the domestic care and service sector has become an important market, in many countries it is either not fully covered by the industrial relations system or is covered only in a fragmented manner.

A primary obstacle to recognizing domestic care and service work within the industrial relations system is that the work is often not perceived as such by social partners (Aronson & Neysmith, 1996). An important reason for the work going unacknowledged is that similar tasks are often performed by informal caregivers, such as family members, leading to a perception that it is not recognized as formal work. This remains true even when individuals are paid for the work, making it formal employment. Additionally, the distinction between informal and formal work in this sector is increasingly blurred due to government income support or incentives that encourage hiring family members or 'informal' workers, often migrants (Simonazzi, 2008). A second, related, obstacle for domestic care and service work being recognized by social partners is that a significant proportion of the work is undeclared. Estimates suggest up to 70% (European Commission, 2021). Third, in times of marketisation and increased pressure for efficiency and cost cutting, home care workers are also asked to perform 'more with less', encouraging additional unpaid work that tends to go unrecognized (Bolton & Wibberley, 2014; Pulignano, 2019). Together, these characteristics and unclarity make domestic care and service work harder to be recognized as regular work.

Domestic care and service work not being adequately recognized as such, contributes to precarious working conditions of groups of workers in domestic care and service work (Armstrong & Armstrong, 2009; Esteves-Abe & Hobson, 2015). Moreover, the fact that the workforce often consists of individuals with weaker bargaining positions—most of whom are female, more likely to be migrants, and have less

recognized educational credentials compared to the general population—further contributes to the widespread precarious working conditions in this sector (Ledoux & Krupka, 2022). Moreover, the large proportion of undeclared and unrecognized work makes workers vulnerable, and the lack of formal employers complicates regulation of the sector. This situation could deteriorate further as platforms, which are on the rise in this sector, may exploit the institutional 'vacuum' or contribute to further informalization of the labor market (Pulignano et al., 2023; Rodríguez-Modroño, Agenjo-Calderón & López-Igual, 2023). Hence, an important challenge for improving the working conditions in the sector is formalizing work in the sense of encouraging and declaring paid work, but also clearly recognizing the scope of home care work and the skills and competences it utilizes, and thus professionalizing it.

The literature shows that it varies between countries to what extent the work and the sector are recognized by social partners and working conditions regulated. For example, in France the vast majority of domestic care workers are declared and (legally) employed. This is because the French system is characterized by tax incentives and benefits for employers who declare their domestic workers (Ledoux & Krupka, 2022). As a consequence, the majority of home care workers in France are in one of two employment positions: employed by private households or employed by service providers, with self-employment being marginal. In both cases, French domestic workers are covered by legally binding collective agreements (Ledoux & Krupka, 2022), even though there is no single collective agreement for the sector. Rather, various smaller ones for particular employment relations, such as employment by private households, by for-profit agencies, or non-profit agencies, are in place. This limits their effectiveness (Ledoux & Krupka, 2022). In Spain, on the other hand, the sector is covered by a multi-level collective bargaining system which is not able to turn around bad working conditions (Sánchez-Mira et al., 2021). The formal system in place is expensive and the familialistic culture means that large parts of the population prefer being taken care of at home by family members anyway. An alternative to both family care and the (unaffordable) professional care is the informal work of migrants, where no professional certification is required and working conditions are precarious (Sánchez-Mira et al., 2021). In the Netherlands and Germany, on the other hand, the lack of formalization of domestic work greatly shapes the trade-union activity in these countries. Whereas in France, the formalization of domestic work led to the formation of employers' organizations and consequently, the process of collective bargaining, in the Netherlands and Germany the lack of formalization means that trade-unions lack a negotiating partner (van Hooren et al., 2021). These examples show that how the sector is recognized by social partners and included in the system of industrial relations varies between countries.

The national context is thus important for how and to what extent domestic care and service work is included in the system of collective bargaining and for the quality of the

working conditions in place. However, since most existing studies focuses on individual-country cases of collective bargaining (Ledoux & Krupka, 2022; Sánchez-Mira, Olivares & Oto, 2021) and trade-union actions (Boris and Klein 2006; van Hooren 2021; Murphy and Turner 2014), there is little comparative knowledge on working conditions of domestic care and service work and on how social partners deal with this sector (van Hooren et al., 2021). This report addresses this gap in knowledge by comparing the industrial relations and working conditions in the sector based on case studies of the sector in six countries: Italy, Spain, Ireland, France, Denmark and the Netherlands.

This report continues in section 2 with a description of the country's case studies and methods used for the case studies. Section 3 focuses on to what extent and how the sector is defined in each of the countries. Section 4 continues with the working conditions of workers in this sector. Section 5 describes the industrial relations systems in place in the sector in each of the countries, including a description of the actors and, if in place, the collective labor agreements. Section 6 describes how and to what extent social partners shape the sector and deal with its complex and diffuse nature with high levels of undeclared work. It also addresses how social partners deal with platforms that emerge in the sector. Section 7 summarizes the insights and highlights the main implications of this report.

2. Justification of methodology

The analysis presented in this report is based on a comparative study of case studies from six countries: Denmark, France, Ireland, Italy, Spain, and the Netherlands. Each case study examines the industrial relations system in the home care sector, the coverage and content of applicable collective labor agreements, and the state of working conditions. A variety of information sources were utilized for these case studies.

First, academic and/or gray literature was reviewed to understand the industrial relations within the home care sector. Sources included academic articles, public policy briefing notes, trade union publications, and submissions from employers or unions (Ireland, Denmark, and the Netherlands). Second, numerical data was gathered from surveys, such as national labor force surveys (all countries), household surveys (Spain, Ireland), the Structure of Earnings Survey by Eurostat (Spain), and the COLLEEM Survey (Italy). In addition to these surveys, other statistical sources, such as data from the Social Security Administration (France) and register data from Statistics Netherlands (the Netherlands), were also included. Finally, interviews were conducted in some countries to gain deeper insights into the sector. Semi-structured expert interviews with representatives from trade unions and employers' organizations were held to supplement the information for the Netherlands and Italy. The case studies for Ireland, Italy, and France also incorporated interview content from other research projects.

The case study reports for each of the six countries were compared through a qualitative comparative analysis using Atlas.ti software. The data was analyzed using a three-step coding process: initially focusing on the main questions covered in the sections, then detailing the questions further, and finally applying an inductive coding step to capture any additional information. The results of the comparative analysis are presented in the following sections. The individual reports can be found on the Origami website (<https://origamiproject.it/reports>).

Several limitations were encountered during the comparative analysis. A key challenge was the variation in how the domestic care and service sector is defined across the countries studied. Due to differences in national approaches and structures, each country has its own definition of the sector. For example, the terminology used to describe domestic care varies, with terms such as "home care work" and "domestic work" used interchangeably. Additionally, the categories defining the scope of tasks and types of workers differ between countries. Some, like France and the Netherlands, distinguish between workers based on skill levels and certifications, while others categorize workers based on the tasks they perform. This variation limits the comparability of statistics across countries. Another limitation relates to changes in

legal frameworks, which can lead to the recategorization of tasks. Such changes complicate the comparison of statistics within the same country over time.

3. Defining the domestic care and service sector

Across the countries included in this study, certain core principles guiding the organization of the domestic care and service sector are widely shared. These include the recognition of domestic work as a vital part of the sector and general alignment with international standards, such as the ILO's Domestic Workers Convention. However, beyond these similarities, the organization of the sector varies significantly, reflecting each nation's approach to categorizing and legally recognizing domestic workers (see also report D2.3 of the ORIGAMI project).

In **France**, the sector is defined by the type of work performed, covering a range of services such as care, cleaning, gardening, and school support. The definition has evolved over the last decade. Prior to 2020, the sector was divided into two main categories: (1) home care and social care workers, including those employed by organizations or households to provide care for families with multiple children, the elderly, and disabled individuals, and (2) cleaning workers, who were employed directly by families for household cleaning tasks. Some workers employed by service providers also fell into this category, although they technically did not belong there. Since 2020, the categorization of the sector has been refined, dividing the sector into: (1) skilled workers with state diplomas, and (2) unskilled workers without state diplomas. Both groups perform tasks such as shopping, meal assistance, administrative help, and accompanying clients on outings, catering to individuals who are ill, disabled, or highly dependent but live in their own homes. Skilled workers are employed by a range of entities, including non-profit and for-profit organizations, local authorities, private households, or companies, while unskilled workers, though a minority, are typically paid through official authorizations from companies or private individuals. In this way, France defines the sector by the type of work performed and distinguishes between workers with and without formal qualifications.

In **Ireland**, by contrast, the sector is defined by the location of the work. The domestic care and service sector consists of workers employed in or for a household for a significant number of hours. Individuals working occasionally, sporadically, or in a non-occupational capacity are not considered domestic workers. Most statistics focus on cleaners, though not all workers are strictly classified as such; other types of work performed for private households are also included in the definition. Unlike in France, no further distinctions are made between different groups of workers in Ireland's sector. **The Netherlands'** approach is similar to Ireland's, in that the location of the work is the defining feature. The sector includes services provided to clients within their own homes, ranging from long-term and short-term healthcare to cleaning and household services. A distinction is made between the public and private parts of the sector. In the public sector, home care services—such as nursing, personal care, and

household care—are provided to chronically ill individuals, the elderly, the disabled, and those temporarily in need of care. This care typically requires a medical assessment and is delivered by trained nurses and healthcare professionals. The private sector is less defined and regulated, encompassing domestic work such as cleaning, personal assistance, and care services provided in or for households. No specific education or training is required to work in this part of the sector. This division between private and public in the Netherlands mirrors the distinction in France between sectors that require formal education and those that do not.

In **Italy**, the defining feature of the sector is not only the type of work but also the type of employer—specifically, families. The sector is characterized by workers directly hired by households to care for and maintain them. A key aspect of the Italian definition is that households act as the direct employer, with the location, namely private households, being the distinguishing factor. The specific tasks performed do not determine inclusion in the sectoral definition.

In **Spain**, the sector is defined by a special labor regime outlined in Royal Decree 1620/2011, which governs employment relations for domestic service within family households. Employment relations that do not involve domestic tasks or that are established with legal entities are excluded from this regime. For example, if domestic tasks are performed both within the employer's home and outside (such as in a business owned by the employer), the employment relationship falls under the Workers' Statute rather than Royal Decree 1620/2011. Non-domestic services that are sporadic or marginal compared to household tasks may still be covered by the special employment relationship, provided the employer can demonstrate this. However, when the employment relationship is with a legal entity, the special regime does not apply, as legal entities cannot be employers within a family household. Likewise, individuals hired by public or private institutions to provide care are not covered by this special regime. Therefore, in Spain, it is the legal employment framework that defines the sector.

In **Denmark**, the defining feature of the sector is the type of care provided, with further distinctions between skilled and unskilled workers. The sector primarily encompasses services related to elder care, domestic assistance, and cleaning services provided within private homes. Skilled workers, such as social and healthcare assistants, receive formal training and are employed by municipalities, non-profit organizations, or private entities to deliver personal and healthcare services to the elderly and disabled. Unskilled workers, whose numbers have increased significantly in recent years, perform various support tasks, including personal care and household assistance, often without formal qualifications. This sector is characterized by significant public sector involvement, particularly in elder care, where services are often provided by municipal employees or through contracts with private companies.

Overall, the way the sector is defined and its key features vary considerably between countries. The following sections will discuss how these national variations impact the working conditions and their regulation in the domestic care and service sector.

4. Working conditions in the domestic care and service sector

A defining feature of the work in the domestic care and service sector in all countries included is the prevalence of precarious work, including insecure contracts, low wages and health and safety issues. However, there are some clear differences between how the sector is organized between the countries in this study, resulting in turn in variation in working conditions.

First, the level of formalization of the sector varies, which is then reflected in the quality of working conditions. **Italy** is an example of a case where the sector is heavily influenced by informality. In this country, many workers are employed under live-in arrangements, which can lead to dependence on employers and contribute to exploitative practices. In line with the informal organization of the sector, it is characterized by long working hours and a high incidence of undeclared work, with wages frequently below the national average. Issues such as contractual dumping and unpaid overtime are common, particularly in arrangements involving intermediaries, whether for-profit or non-profit. In **France** and **Denmark**, on the other hand the sector is more formalized, which is reflected in collective agreements in place (see chapter 5 of this report).

Second, in all countries the quality of the working conditions varies quite considerable between qualified workers enjoying better protections and working conditions than unqualified workers. This is illustrated by the case of Spain that sees large differences in working conditions depending on the type of contract and section of the sector. Workers directly employed by households in this country, classified as "private domestic employees", have limited protections and are often excluded from rights related to working hours, rest periods, and health and safety. Collective bargaining agreements have introduced additional protections such as statutory minimum wages and severance pay in response to the lack of protection. Public sector employees, on the other hand, enjoy better protections under civil service law, while those in non-profit and for-profit organizations are covered by different collective agreements that offer varying levels of protection.

Working conditions of unqualified workers are not only worse compared to other groups of workers, they are also slower to improve. The case of Denmark is an illustration. In this country, social and health care assistants saw an increase of their minimum hourly wage in collective agreements between 2017 and 2024 of 23 percent, while unskilled care staff saw only an 18 percent increase. In addition, workers in this latter category with marginal part-time jobs often experience a wage penalty, leading to even more precarious working conditions.

Third, as became clear in the previous section of definitions, some countries make a distinction between the public and private part of the sector (e.g. France, the

Netherlands, Ireland and Spain). When this is the case, this is also reflected in differences in the quality of working conditions between the two parts of the sector, where working conditions tend to be better in the public part of the sector. In **France**, for example, part-time work is omnipresent, and working hours are often unpredictable, especially in the private sector, which has led to extended work hours without corresponding increases in compensation. Due to the change in definition, one on one comparison of the percentual increase of wages is difficult. However, workers in the public section of the sector have consistently been paid more than the workers in the private section. This is also the case for **Ireland**. In this country, public sector care workers earn at least €13.10 per hour and are paid for travel time between clients, but private sector workers often face more precarious conditions. Many are employed on zero-hour contracts and lacking guaranteed hours, which has led to underemployment despite high demand for services. The general shift towards the private sector in the sector in Ireland has thus led to a further deterioration of working conditions. Also in **Spain**, the poor working conditions and job insecurity prevalent in the sector are ascribed to 78 percent of workers being employed in the private part of the sector. The sector witnessed a notable shift towards employment in small companies in this part of the sector and the proportion of undeclared work is high, leading to poorer working conditions.

Table 1 provides a more detailed overview of the working conditions in the countries under study. Beware while reading the table that the definitions of the domestic care and service sector underlying the statistics vary between countries (see previous section and the underlying national reports). This means that the statistics are not fully comparable. We therefore treat the statistics as a rough comparison of the working conditions of home care and cleaning workers across the countries. The table shows that in all countries in the study, the majority of the workers is female. In some countries, the share of migrant workers is high (Italy and Spain), whereas in other countries these numbers are considerably lower (France and the Netherlands). It needs to be kept in mind that these large differences might result from the sectoral definition underlying the statistics, however the variation can also be understood from differences in the organization of the sector. In Italy, where live-in arrangements are not uncommon, 91 percent of the workers in this arrangement are first generation migrants. The statistics on the Netherlands cover all workers formally employed in the care and cleaning sectors, including those working in companies and organizations rather than the homes of clients, which might have reduced the proportion of migrant workers. Table 1 also shows that in all countries undeclared work exists, but the numbers –if available– vary considerably. The Netherlands and Italy rank the highest with more than half of the work being undeclared. Nevertheless, in all countries under study undeclared work is prevalent and more so than in other sectors of the economy. Contract types differ greatly amongst the countries. Spain divides between

permanent and temporary contracts. Similarly, Ireland divides the workforce into contracted cleaners and cleaners employed in commercial settings. France on the other hand segments the workforce by type of employer and level of skill of the workers. Interestingly, both Denmark and The Netherlands include multiple worker types, including the solo self-employed workers. Due to the high rate of informality in the sector, in Italy, workers in the home care sector mainly operate under informal contracts.

TABLE 1: Working conditions in the (wider) domestic care and service sector in the countries under study

	ITALY	DENMARK	IRELAND	FRANCE	SPAIN	NETHERLANDS
DATA SOURCE	DOMINA INPS	Ministry of Social Affairs, Housing and Elder Care, 2024 & European Labour force Survey, 2024	CSO + Literature study	INSEE LFS	INE microdata	Statistics Netherlands
YEAR DATA	2023	2023	Varies	2022	2020	2023
FEMINIZATION (%)	86.4%	88%	Not available	96.1%	Over 90%	92%
MIGRANT WORKERS (%)	Overall: 69.5% Live in workers: 91% Live out workers: 76%	Not available	Not available	24.2%	Nearly 60%	11.01%
UNDECLARED WORK (%)	51.8%	4–10%	7.3% in economy as a whole (2019)	20% (2017) declining	Common	70% (estimation)
CONTRACT TYPES	A significant portion of the workforce works informally or has semi- compliant contracts.	<ul style="list-style-type: none"> • 7% agency workers • 14% temporary contracts • 2.5% solo self-employed 	<ul style="list-style-type: none"> • Contract cleaners and cleaners directly employed in commercial settings • No information available on care workers 	Mostly employed by companies or families <u>Self-employment</u> <ul style="list-style-type: none"> • Home care (skilled): • 0,5% 	<ul style="list-style-type: none"> • 66.5%: permanent contract • 32,8% temporary contracts • 0.6% n/a 	<ul style="list-style-type: none"> • 26% self-employed • Over 80% employees, of which: • 29.7% flexible contracts

	There are many live-in arrangements and a wide-spread use of intermediaries	<ul style="list-style-type: none"> Other types of flexible employment (e.g. zero hour contracts) are also common 		<ul style="list-style-type: none"> Home care (unskilled): 3% Cleaning: 6% 		<ul style="list-style-type: none"> 1.5% temporary contracts
WAGES	Below the national average and 30% can be classified as working poor	Relatively low, but rising (11-13 percent between 2017 and 2022 depending on the type of workers)	Publicly employed home care workers earn above the minimum wage but below the living wage. No reliable data exists for private sector workers	Workers in public organizations and skilled workers have higher wages. Cleaners have lower wages than care workers.	Below the national average	Not available for this sector
WORKING HOURS	Long working hours, 24.1% works more than 40 hours a week	19% full time 74% reduced hours	<ul style="list-style-type: none"> Underemployment is common High prevalence of 0-hour contracts 	<ul style="list-style-type: none"> High prevalence of part time work. Unpredictable working hours. 	74,9% full-time 25,1% part-time Overtime pressure: 48,7% works more than 40 hours a week	Part-time: about 55%

Note: this table is a summary of the information provided in the national reports (deliverables 2.2). These can be accessed at: <https://origamiproject.it/reports>

5. Industrial relations in the domestic care and service sector

Industrial relations in the domestic care and service sector across the six European countries studied reveal a diverse and complex landscape. In most countries, the bargaining systems do not have a collective labor agreement (CLA) specifically focused on this sector. Instead, workers in the domestic care and service sector are typically covered by one or more CLAs that apply to care and cleaning work more broadly, including work performed in institutions and companies. Furthermore, the extent to which industrial relations systems cover domestic care and cleaning work through CLAs varies between countries, reflecting broader differences in their industrial relations frameworks. We will begin by discussing the industrial relations systems covering the sector in each country individually, followed by a more comprehensive comparison of the most important differences and similarities.

5.1. Industrial relations in the sector in each country

In **Denmark** work in the sector is covered by a comprehensive bargaining system, reflecting the broader industrial relations framework of the country. Domestic care work is part of the larger elder care sector, where collective bargaining is well-structured and particularly developed in the public sector. Four main employer organizations play key roles: Local Government Denmark (KL), representing the 98 municipalities in collective bargaining; Danish Industries and the Danish Chamber of Commerce, representing private cleaning and care companies; and the Christian Employers' Association, which also participates in negotiations. In the public sector, collective bargaining is highly centralized, with KL negotiating on behalf of municipalities at multiple levels—central, sectoral, municipal, and workplace. This multilayered bargaining process allows for detailed and comprehensive regulation of working conditions. Trade unions, such as FOA (representing care workers) and DSR (representing nurses), are deeply involved in these negotiations. However, in the private sector, bargaining coverage is lower, and the process is more fragmented. The cleaning sector, although similar in its industrial relations structure, has its own collective agreements, often negotiated separately by 3F, which represents cleaning workers. Organizations like KRIFA and Det Faglige Hus are alternative trade unions that represent workers in the sector but do not participate in collective bargaining, focusing more on individual legal advice and services, which limits their influence in shaping sector-wide working conditions.

France presents a more fragmented industrial relations landscape for domestic care and service work, with a wide range of employer organizations and trade unions

involved. Employer organizations include FEPEM, which represents private domestic employers; USB Domicile, representing non-profit organizations; and four major employer organizations (FEDESAP, SYNERPA, FFEC, and SESP) representing personal service enterprises. Trade unions involved in negotiations include CGT, CFDT, and FO. This fragmented landscape, with numerous organizations participating, reflects the division between the for-profit and non-profit sub-sectors that defines the sector in France. Each sub-sector operates under its own collective labor agreement (CLA). The two main CLAs are the "Convention BAD" (covering non-profit associations) and the "Convention SAP" (covering for-profit firms), both of which have been extended to apply sector-wide. These agreements cover working hours, wages, and additional protections beyond the Labor Code. However, the negotiation process is complex and often marked by disagreements. For example, CGT and FEPEM negotiate CLAs in the private domestic sector, while CFDT advocates for broader coverage at the branch and company levels. The large number of social partners and distinctions between sectors—such as for-profit vs. non-profit, public vs. private—contribute to a fragmented and sometimes disjointed industrial relations system.

In **Ireland**, the industrial relations landscape for the domestic care and service sector is unique in that there are no formal employers' organizations covering any part of the sector. Instead, trade unions like SIPTU negotiate directly with employers, often through the Workplace Relations Commission. This direct approach reflects Ireland's more liberal labor relations model. While the absence of employer organizations simplifies negotiations, it also limits the scope, focusing on individual employers rather than sector-wide agreements. This can lead to inconsistencies in working conditions, particularly between public and private care providers, and there is no standard CLA across the sector. As a result, working conditions and wages vary, and the lack of a unified employer voice allows unions greater influence, though this does not always result in better conditions, particularly in the more precarious private sector.

In **Italy**, industrial relations in the domestic and care services sector are heavily influenced by two employer organizations: FIDALDO and DOMINA, which specifically represent domestic work. These organizations play a central role in negotiating CLAs that cover wages, working hours, and health and safety conditions. However, the sector is characterized by high levels of informality, especially in southern regions where much of the workforce operates under informal or semi-formal contracts. This limits the reach of CLAs, as many workers are outside the formal labor market. Trade unions like CGIL, CISL and UIL are active in representing workers, but their influence is also constrained by the widespread informality and fragmented employment in the sector. As a result, there is a dual system in place, where formal agreements exist but are not always enforced, and many workers operate in the informal economy, bypassing these agreements.

In **Spain**, industrial relations in the domestic and care services sector are complex, with multiple layers of collective bargaining at the national, regional, and provincial levels. The sector is represented by four main employer organizations: FED, AESTE, ASADE, and CEAP. However, the emergence of CEAP has strained relations within the employer community, as older organizations have resisted recognizing CEAP's representativeness. This internal conflict has caused delays in reaching collective agreements, exemplified by the five-year stalemate before the recent 2023 national agreement was finally signed. Trade unions, primarily CC.OO. and UGT, are deeply involved in the negotiation process, but the sector's fragmentation complicates their efforts. The sector's CLA, particularly the VII CA on care services for dependent persons (2023–2026), covers both home-based and residential care, but negotiations are often challenging due to differing priorities among trade unions and employer organizations. Similar to Italy, the sector in Spain is characterized by high levels of informality, limiting the effectiveness of the CLA in reaching all workers.

In **the Netherlands**, domestic care and service provision work is covered under CLAs in the broader care and cleaning sectors. However, no separate agreement exists specifically for workers providing services in clients' homes, particularly those without a formal employer, leaving them somewhat unrecognized by the social partners that regulate the sector. The larger cleaning and care sectors, which include domestic service provision, are well-developed and characterized by a strong tradition of collective bargaining. Three main employer organizations—ActiZ, ZorgthuisNL, and Schoonmakend Nederland—represent the care and cleaning sectors. The Dutch trade unions, primarily FNV and CNV, play a key role in these negotiations, advocating for better wages and working conditions in both care and cleaning sectors. They have been instrumental in pushing for improvements, such as wage increases and enhanced worker protections, particularly for those in formal employment. However, their influence is more limited in the growing informal and self-employed sectors, where workers often lack union representation. The Dutch system is characterized by a clear distinction between the public and private sectors, with public benefit organizations playing a significant role in the care sector. However, unlike in Denmark, the Dutch government does not actively participate in the bargaining process, leaving negotiations entirely to the social partners. The CLAs that cover the sector are the VVT (covering home care) and the SGB (covering cleaning services). Both agreements are comprehensive, regulating a wide range of employment conditions, including wages, working hours, and health and safety standards. This system enables a high level of regulation and standardization in working conditions, but it also makes the role of social partners crucial in maintaining these standards. Despite this, challenges persist, particularly in addressing the rise of informal care and the increasing reliance on flexible and temporary contracts.

5.2. Comparing industrial relations in the domestic care and service sector

The description of industrial relations in the domestic care and service sector across the studied countries reveals significant variation. Denmark and the Netherlands, for example, feature structured and comprehensive bargaining systems that cover both care and cleaning work, with active participation from multiple employer organizations and trade unions. However, in the Netherlands the system fails to include domestic workers employed by families. In contrast, countries like Italy and Spain face challenges due to a high degree of informality in the sector, complicating the negotiation process. France presents a fragmented system with numerous social partners, leading to a complex and often disjointed bargaining process. Ireland's approach, characterized by direct negotiations between unions and employers, reflects its more liberal labor relations model but results in inconsistent working conditions across the sector.

These differences in negotiation structures impact the coverage of CLAs in the sector. Most countries focus on sectoral and/or business-level agreements, whereas Spain and Denmark employ distinct models. In Spain, there is a division between national, regional, provincial, and company levels, reflecting the country's size and historical development. In Denmark, CLAs are negotiated at four different levels: central, sectoral, municipal, and individual workplace levels. Each level can negotiate specific terms, with higher levels providing a general framework and lower levels addressing more specific details relevant to the work performed.

While current industrial relations in many countries show relatively harmonious collaboration between social partners, this has not always been the case. In particular, the Netherlands and Spain have experienced clashes between social partners that led to blockades and a lack of participation from one or more parties, weakening collaboration. However, through efforts from both sides and, in some cases, governmental intervention, these conflicts have largely been resolved, leading to the current state of the sector. If the different systems of collective bargaining in the countries under study are compared, it also becomes clear that the dividing lines observed in the definition of the domestic care and services sector used in each country (see chapter 3) are reflected in the industrial relations that cover them. One of such divisions is the divide between public and private companies for care workers, found mainly in Denmark and the Netherlands. However, it varies between those two countries to what extent the government is involved in the negotiation of CLAs as an employer of the public part of the care sector. In Denmark, the local government actively participates in the bargaining process, functioning as one of the employers' organizations at the table. For the Netherlands, the government acts as a regulatory body, a financier, and employer, but does not actively participate in the bargaining process, leaving negotiations to the social partners.

Additionally, in these two countries, the private and public parts of the sector are also organized differently. In Denmark, care companies operate in both sectors, with the distinction based on the client's needs rather than the provider. In the Netherlands, there is a clear separation between care and cleaning tasks, with different collective labor agreements (CLAs) for each. In the care sector, whether care is privately contracted or publicly funded depends on the client's medical needs, but the same CLA applies regardless of the funding source.

Another notable distinction in the definition of the sector across the studied countries is the division between for-profit and non-profit organizations. In France, for instance, both types have their own collective labor agreements (CLAs), with the non-profit sector relying on public funding. Similarly, in the Netherlands, the public sector includes specific non-profit entities known as public benefit organizations. The majority, if not all, of the care institutions in the Netherlands are classified as public benefit organizations. Consequently, there is no separate CLA for non-profits; instead, they are covered under the general CLA that applies to the broader care sector.

6. Social partners' visions on regulating the sector and platform work

Although the industrial relations systems and regulation of working conditions vary between the countries in this study, the perspectives of social partners, especially trade unions, are relatively aligned. We will first discuss each country individually, and then explore the similarities and differences in the visions of social partners.

6.1.1. The visions of social partners in each country

In **Denmark**, the domestic and care services sector is regulated through comprehensive collective agreements, particularly in the public sector, where social partners play a crucial role in maintaining high standards for wages, working hours, and health and safety. Informal work is relatively rare, and social partners focus on ensuring that even non-standard workers are covered by these agreements. Although platform work remains marginal, Danish social partners, especially the 3F union, have been proactive in negotiating agreements with platforms like Hilfr, setting a precedent for regulating this emerging form of employment to prevent the erosion of working conditions in the sector.

In **France**, the sector is regulated by a fragmented system of multiple collective agreements tailored to different segments such as for-profit, non-profit, and domestic work. This fragmentation results in inconsistent effectiveness across the sector. Informal work, especially in domestic roles, remains a significant challenge. Social partners are advocating for stronger enforcement of labor laws to address these issues. As platform work becomes more prevalent, French social partners are pushing for platforms to be recognized as employers to ensure that workers are covered by existing labor protections.

In **Ireland**, the sector is less regulated compared to other countries, with no formal employer organizations and collective bargaining conducted directly between trade unions and employers. This leads to inconsistencies in working conditions, particularly in the private sector. Informality is a major concern, especially in private home care, where social partners are focused on advocating for better enforcement of labor standards and the formalization of employment. Platform work is emerging, but regulation remains limited, and social partners are only beginning to address these challenges.

In **Italy**, the domestic and care services sector is regulated by a few collective agreements negotiated by organizations such as FIDALDO and DOMINA. However, enforcement is weak due to widespread informality, particularly in the southern regions. Social partners like CGIL, CISL and UIL are pushing for stronger enforcement

and formalization to address the pervasive issue of undeclared work. While platform work is not yet a major focus, Italian social partners are aware of its potential impact and advocate for including platform workers under existing labor protections.

In **Spain**, the sector is regulated through a complex system of collective bargaining at national, regional, and provincial levels. The sector faces significant internal conflicts among employers' organizations, complicating the negotiation process. Informality, particularly in domestic work, is a major issue, with social partners advocating for increased inspections and penalties to combat undeclared work. As platform work grows, Spanish social partners are pushing for stronger regulation to ensure that platform workers receive the same protections as traditional employees.

In **the Netherlands**, the sector is regulated through collective agreements that cover most aspects of formal employment, while undeclared work is somewhat regulated by law. The Dutch government does not participate directly in bargaining. Although informality is less pronounced compared to other countries, it still exists, particularly in cleaning services. Social partners work to minimize informality and strive to ensure comprehensive coverage under collective agreements. While platform work is not yet widespread, Dutch social partners are advocating for preemptive regulations to protect platform workers, including efforts to provide them with employee status, as seen in the Dutch trade unions' strategy in the *Helpling* court case.

6.2. Informal work and how social partners address it

Undeclared work is a significant issue in the domestic and care services sector, especially in Italy, Spain, and Ireland. In these countries, a large portion of the workforce operates outside formal labor markets, undermining the effectiveness of collective agreements and legal protections. Social partners in these countries have adopted various strategies to address this issue. For instance, in Italy, trade unions such as CGIL, CISL and UIL have advocated for stronger enforcement of existing labor laws and greater formalization of employment through collective bargaining. In Spain, social partners have pushed for increased inspections and penalties for employers engaging in undeclared work. In Denmark and the Netherlands, where informality is less prevalent, the focus has been on maintaining high standards through robust collective agreements and ensuring that all workers, including those in non-standard employment, are covered by these agreements.

6.3. Social partners' approach to platforms in the sector

The rise of platform work in the domestic and care services sector presents new challenges for social partners across these countries. In Denmark and the Netherlands,

where platform work remains relatively marginal, social partners have been proactive in addressing this issue. For example, the Danish trade union 3F negotiated a pioneering collective agreement with the platform-based cleaning company Hilfr, marking the first of its kind in Denmark. This agreement includes provisions allowing platform workers to choose their employment status, guarantees minimum hourly wages, and establishes rules on dismissals and profile removals from the platform.

In contrast, in countries like France and Spain, where platform work is more widespread, social partners are still grappling with how to effectively regulate this emerging form of employment. In France, trade unions and employer organizations are pushing for platforms to be recognized as employers, which would subject them to existing labor laws and collective agreements. Similarly, in Spain, social partners are advocating for greater regulation of platforms to ensure that workers receive the same protections as those in traditional employment.

In summary, while social partners across these countries share a common concern about the impact of informality and platform work on the domestic and care services sector, their approaches vary based on the specific context of their labor markets. In countries with more formalized sectors, the focus is on maintaining high standards through collective bargaining, while in countries with higher levels of informality and platform work, the emphasis is on formalization and stronger regulation.

7. Conclusion and discussion

The domestic and care services sector in Europe is a complex and evolving field marked by diverse regulatory frameworks, varying degrees of formalization, and a wide range of industrial relations practices. Its significance is growing due to demographic shifts, such as aging populations and changes in family structures, which have increased the demand for home-based care and domestic services. Despite its importance, the sector remains challenging to regulate effectively, with significant portions of the workforce operating under informal or precarious conditions.

The regulation of the domestic and care services sector across the six European countries examined—Denmark, France, Ireland, Italy, Spain, and the Netherlands—reveals notable differences in how these countries manage and support this vital workforce. Denmark and the Netherlands have developed more structured and comprehensive systems, characterized by overarching collective bargaining and a comparatively high degree of formalization (though undeclared work remains an issue). These countries demonstrate that effective regulation and inclusion within a system of collective bargaining can lead to better working conditions and more stable employment arrangements.

In contrast, countries like Italy and Spain face challenges with high levels of informal and undeclared work, which undermines the effectiveness of collective agreements and leaves workers vulnerable to exploitation. France's fragmented sector, with multiple and often overlapping collective agreements, has led to inconsistencies in worker protections and working conditions. Ireland, with its more liberal approach to labor relations, lacks formal employer organizations, resulting in direct but often uneven negotiations between employers and trade unions.

The rise of platform work adds another layer of complexity to the sector. While Denmark has been proactive in addressing this issue through pioneering collective agreements with platforms, other countries are still grappling with how to regulate this emerging form of employment. These challenges highlight the need for adaptable and forward-looking regulatory frameworks that can protect workers in an increasingly digital and fragmented labor market.

The findings from this comparative analysis underscore the critical role that social partners play in shaping regulations within the domestic and care services sector. In countries where social partners are actively involved in collective bargaining and where the sector is well-integrated into the broader industrial relations system, workers tend to experience better protections and more stable working conditions. However, the persistent issues of informality, undeclared work, and the rise of platform

work present significant challenges that require coordinated responses across all countries.

Overall, the experiences of these six countries suggest that there is no one-size-fits-all solution to regulating the domestic and care services sector. National contexts, cultural factors, and the structure of the labor market all play crucial roles in determining the effectiveness of industrial relations and worker protections. Nonetheless, the shared challenges of informality, platform work, and the need for better regulation indicate that there are common areas where European countries can learn from each other and develop more effective strategies for supporting this essential sector.

8. References

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