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PROTECTION WITHOUT EMPLOYMENT: THE POLICY LOGIC, IMPLEMENTATION, AND REFORM OF CHINA'S OCCUPATIONAL INJURY PROTECTION PILOT FOR PLATFORM WORKERS

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Abstract: China hosts the world's largest platform workforce: roughly 84 million people in "new forms of employment", most of them outside standard labour law and the employment-based work-injury insurance that depends on it. Since 2022 the Chinese state has answered with a distinctive instrument, a status-neutral occupational injury protection scheme funded by platforms through a small charge on every order and triggered by the work rather than by an employment relationship. This article evaluates that pilot. It reconstructs the policy logic, reading the scheme as a case of Chinese policy experimentation that deliberately decouples social protection from employment status. It documents the design and the 2022 to 2026 implementation, during which the pilot grew from seven provinces to seventeen, lifted enrollment from 8.9 to 25.1 million, and set a course for nationwide coverage in 2026. It places the scheme in international perspective and finds no close analogue for its per-order, platform-funded, mandatory model. It then identifies the gaps that remain, namely single-risk coverage, thin evidence on claims and adequacy, unresolved worker status, weak portability, and the fragility of the move from pilot to permanent institution, and the reform pathways each implies. The pilot shows that social protection can be decoupled from employment and funded at the level of the transaction. Whether it becomes a durable, portable, multi-risk floor will be decided in the scaling and legislation now under way.
Keywords: Occupational injury; Platform work; Gig economy; Social protection; China; Policy experimentation; Work-injury insurance; New forms of employment

1 INTRODUCTION

China's labour force numbers roughly 402 million people. Of these, about 84 million work in what official statistics call "new forms of employment": food-delivery riders, ride-hailing and freight drivers, and couriers [1]. That is close to one in five workers. The category has grown alongside the platform firms that organise it, and platform work has reshaped how labour is dispatched, priced and supervised [2]. Most of these workers stand outside the standard apparatus of employment protection. They are classified as non-employees, or engaged through layered outsourcing and agency chains that obscure who, if anyone, is the employer.

Among the risks these workers carry, physical injury is the sharpest. Delivery, ride-hailing and same-city freight are road-based occupations. They are physically demanding and paced by algorithms that reward speed and penalise delay. The combination of income pressure and workload raises the chance of injury on the road, as Zhan et al. document [3]. Section 2 examines that evidence in detail. The point to fix here is simpler. For a workforce this large, in occupations this dangerous, the question of who pays when a worker is hurt is not a marginal one. It is the central test of whether platform labour can be made secure.

China already has an answer for injured workers, but it does not reach this group. The standard instrument is work-injury insurance. It is employment-based and employer-funded, and it is triggered only where a recognised labour relationship exists. That design works for workers with a clear employer. It fails platform workers almost by construction. Because most of them are treated as non-employees, or are buried inside outsourcing and agency arrangements, no labour relationship is recognised, and the insurance does not attach. The protection gap is therefore not an oversight. It follows from the way the existing scheme defines who counts as a worker.

China's response to this gap is distinctive. Rather than force platform workers into the employment-based system, or wait for courts to settle their status, the state built a separate instrument around them. The Measures for Occupational Injury Protection of Workers in New Forms of Employment (Trial) created a status-neutral scheme: contributions are levied per order, the platform pays, and no labour relationship is required [4]. The naming itself carries the argument. The scheme is called "occupational injury protection", deliberately not "work-injury insurance". The choice of words signals that protection here is detached from the employment relationship that the older term assumes. The pilot launched on 1 July 2022.

What was a small experiment is now becoming a national institution. The pilot opened in seven provinces and municipalities in 2022. In 2025 it expanded to seventeen, with a stated plan to cover all thirty-one provinces and the Production and Construction Corps in 2026 [5-6]. Enrollment has tracked that widening reach. It passed 8.866 million

workers by mid-2024 and reached 25.1 million nationwide by the end of 2025 [6]. Two successive Government Work Reports have pushed the expansion forward [7-8], and the International Labour Office has named the scheme a good practice in social security [9]. The pilot is no longer provisional in any practical sense. It is settling into permanence as we write.

Scholarship has not kept pace with this. Studies of Chinese platform labour are abundant, and several examine the protection gap directly. Yet none reads the occupational injury scheme as what it most clearly is: a case of Chinese policy experimentation that decouples social protection from employment status. The scheme sits at the meeting point of two literatures that rarely speak to each other. One concerns China's tradition of staged, "by-point-to-surface" policy piloting [10]. The other concerns the design of social protection that no longer rests on a standard employment contract [11]. The pilot is a working instance of both at once, and reading it through that combined lens is the contribution this article aims to make.

This article makes four contributions. First, it reconstructs the policy logic of the scheme: why China chose a status-neutral, per-order, platform-funded design over the alternatives. Second, it documents that design and the 2022 to 2026 implementation and expansion, drawing throughout on official figures. Third, it places the scheme in international perspective, comparing it with how other systems have tried to protect platform and non-standard workers. Fourth, it sets out reform pathways toward full institutionalisation, identifying what must change for a pilot to become durable national policy.

The article proceeds as follows. Section 2 establishes why injury is the binding constraint for platform workers and how the existing work-injury system excludes them. Section 3 sets out the policy-experimentation framework and reconstructs the logic of the scheme. Section 4 details the design and the implementation record from 2022 to 2026. Section 5 compares the Chinese approach with international responses to the same problem. Section 6 identifies the gaps that remain and the reform pathways toward full institutionalisation. Section 7 concludes and sets out a research agenda.

2 THE PROTECTION GAP AND WHY INJURY

2.1 Algorithmic Work and Physical Risk

Platform riders and drivers do not set their own pace. Software does. An app assigns the order, fixes the route, counts down the clock, and scores the worker on whether the food or the passenger arrives on time. This is algorithmic management, and it has become the defining feature of the work [12-13]. The term needs a plain gloss. Algorithmic management means that decisions once made by a human supervisor, who works where, how fast, and on what terms, are now made by code [14]. The worker answers to a system, not a manager. The technology is impressive, but its effect on the body is direct. Sun et al. describe how delivery platforms convert estimated travel times into hard deadlines [15], then penalise late completion. The worker absorbs the gap between the algorithm's optimism and the city's traffic. The usual way to close that gap is to ride faster, jump lights, and take risks. The platform sets the target; the rider carries the consequences.

That logic produces measurable harm. Zhan et al. find that income dependence and heavy workload push injury rates upward, because riders who rely on the platform for a living cannot afford to slow down [3]. The mechanism is economic before it is behavioural. Zheng et al. show that work pressure erodes safe behaviour among Chinese riders specifically [16], the very pressure that the timing systems are designed to create. Road-safety studies reach the same conclusion from a different angle. Nguyen-Phuoc et al. link delivery riders' poor compliance with traffic rules to the demands of the job [17], while Qian et al. trace aberrant riding to how riders perceive and discount risk under time strain [18]. None of these findings depends on a careless minority. The risk is built into the ordinary working day.

The pattern is not confined to one country or one moment. A scoping review by McKinlay et al. gathers the international evidence on rider injuries and finds it consistent [19]: this is dangerous work, and the danger is structural. That word matters. A structural hazard cannot be trained away with safety briefings, because it lives in the incentives, not in the rider. Vignola et al. connect the health costs to algorithmic control itself [20], not merely to traffic. Long hours, irregular schedules, and constant monitoring wear the body down even when no collision occurs. Salmon et al. take a systems view and argue that rider safety cannot be fixed by blaming individuals [21], because the hazards sit in the design of the work. Two further strands sharpen the picture. Tran et al. document the added risks riders ran during the pandemic [22], when demand surged and exposure rose. Mao et al. tie long hours and heavy workloads to health hazards among Chinese platform workers [23]. Huang shows how COVID-19 amplified an already precarious position [24], as riders kept cities supplied while bearing the infection risk themselves. The conclusion is plain. The work is paced by code, the pace produces injury, and the injuries are frequent and serious. This sets up the central question of policy. If the harm is predictable, who pays when it happens?

2.2 Why Standard Protection Misses Them

China's standard answer to workplace injury is gongshang baoxian, work-injury insurance. It is employment-based and employer-funded. It pays only where a recognised labour relationship exists. That design rests on an assumption: that every worker has one identifiable employer who pays into the fund. Platform work breaks the assumption. Most platform riders and drivers are not classified as employees. They are treated as independent contractors, or routed through layers of outsourcing and agency firms that obscure who, if anyone, is the employer [25-26]. A rider may sign

with a labour-dispatch agency, deliver for one platform, and be paid by a third. Feng et al. and Yang document how these contracting chains break the legal link that the insurance requires [27-28]. No labour relationship means no cover.
Chinese scholarship has tried to name the ambiguity rather than resolve it. Ke and Xie develop the idea of an "incomplete labour relationship" [29-30], a category that captures workers who are neither plainly employed nor plainly self-employed. The phrase is useful because it admits the truth: the binary that gongshang baoxian rests on does not fit how platforms organise work. Courts and firms can argue either way, and the worker bears the uncertainty. While that debate continues, the insurance simply does not attach.
A second barrier compounds the first. Many riders are rural migrants working in cities far from where their hukou, their household registration, is held. The hukou system ties many public benefits to a person's registered locality rather than to where they actually work. A migrant rider in Shanghai may hold a rural registration hundreds of kilometres away. Tian et al. show that migrant status and the hukou system already depress participation in social insurance [31], independent of platform work. So even where some form of cover is theoretically available, take-up is low. The two barriers stack, the legal one and the administrative one. The outcome is a perverse mismatch. The workers facing the highest injury risk held the least injury protection [32]. People paid by the order, racing the clock on city roads, were the ones the system left exposed. The conventional categories of Chinese social insurance had no place to file them. That gap, between the risk these workers run and the cover they could reach, is precisely what the pilot was built to close.

3 THE POLICY LOGIC

3.1 a Policy Experiment

China rarely reforms by national decree alone. The more common path is to test a measure in a few chosen localities, watch how it performs, fix what fails, and only then extend it more widely. Scholars call this experimentation under hierarchy, or governing "from point to surface" [10,33]. The phrase captures a dual logic. Local trials supply concrete evidence, while central authorities retain control over what counts as success and what eventually scales.
The texture of this approach has shifted over time. Earlier piloting allowed considerable local initiative and bottom-up variation. Experimentation has grown more centrally directed, with the centre setting the agenda and steering the design from the start [34-35]. The pilot is less a space for local improvisation and more a controlled trial run by the centre. This matters for how we should read the occupational injury scheme. Its terms were not invented locally and later blessed from above. They were set in Beijing and applied uniformly across the chosen sites.
Recent work models how such pilots generate policy learning that feeds back into national decisions [36]. The trial period is meant to surface problems that a desk design cannot anticipate. How should contributions be collected at scale? What counts as a compensable injury for a worker with no fixed shift? How fast can claims be processed? Answers to such questions are hard to specify in advance and easier to discover through practice. Studies of the health sector show the same arc in motion, tracing how local schemes mature into nationwide programmes [37-38]. The lesson is that piloting is not merely caution. It is a method for building the administrative machinery a national policy will require.
The occupational injury protection scheme fits this template closely. It began as a bounded experiment, not a finished law. The founding notice fixed a narrow perimeter: seven provinces and municipalities, four industries, and a handful of named platform firms [4]. MOHRSS designed the parameters centrally, which is the point. A tight perimeter keeps the fiscal and political stakes contained while the design is tested against real claims and real costs. The aim was to learn before any national rollout, and the limited scope made that learning legible. Read this way, the pilot is a deliberate device for producing evidence under central supervision, not a hesitant half-measure.
Several features mark it out as an experiment rather than a permanent statute. The founding instrument is a trial measure, signalled in its own title, and was issued by MOHRSS together with ten departments rather than enacted as law [4]. The choice of sites is also telling. The seven jurisdictions include the largest and most administratively capable regions, where platform activity is dense and where data collection is feasible. Testing in such places yields rich evidence and stresses the design under heavy load. It also concentrates the early costs where local capacity can absorb them. The platforms named in the notice are the major operators in their sectors, so the trial captures the bulk of real-world orders from the outset. Each of these choices serves learning. The pilot generates the operational knowledge that any later national scheme would need, from contribution collection to claims handling, before the centre commits to a wider rollout.

3.2 Decoupling Protection from Employment Status

The scheme's defining move is to attach protection to what a worker does, not to whom the worker works for. Standard work-injury insurance in China rests on a recognised labour relationship. The employer pays, and the entitlement follows the employment contract. Platform workers sit awkwardly against that test. Many are classified as non-employees or are engaged through layered outsourcing and agency chains, so they fall outside the conventional system. Tying protection to activity rather than to status is the way around this barrier.
This design speaks directly to a category that Chinese labour scholars have named the "incomplete labour relationship" [29-30]. The term marks workers who are neither plainly employees nor plainly independent contractors. They take direction from a platform and bear its risks, yet lack the formal contract that triggers employer obligations. The pilot does not try to resolve that ambiguity. It builds protection on top of it. That choice matters because the classification

question has proved hard to settle. Outsourcing and agency layers blur who the real employer is, and litigating each case is slow and uneven. Decoupling cuts through this by making the relationship question irrelevant to coverage.

Internationally, the same instinct appears in debates about unbundling social protection from the employment contract, so that coverage can reach workers whose status is contested [11]. The shared premise is that the contract-based model leaves gaps when work no longer runs through a stable employer. If protection stays welded to employment, the growing population of workers outside standard contracts is left exposed. China's scheme adopts this premise without adopting its full apparatus. It does not create a universal entitlement detached from work; it attaches a specific protection to a specific activity. The link to work remains, but the link to employment status is severed.

Naming carries weight here. The scheme is styled "occupational injury protection", and deliberately not "work-injury insurance". The distinction is not cosmetic (show as Figure 1). Calling it work-injury insurance would imply the employment relationship that the standard system requires, and could be read as conceding that platform workers are employees. The chosen label sidesteps that implication. It delivers injury cover, including for serious and fatal cases, without forcing a verdict on employment status. Protection arrives; the classification question is left open.

Dimension	Occupational injury protection (zhiye shanghai baozhang) — the pilot	Standard work-injury insurance (gongshang baoxian)
Eligibility basis	completion of a work order (activity)	a recognised labour relationship
Worker status required	none — status-neutral	employee
Who pays	the platform	the employer
Contribution base	per order (an dan jiao fei)	total wages / payroll
Collection route	via the State Taxation Administration	employer payroll
Risks covered	occupational injury only (treatment, disability, death)	occupational injury, within a broader social-insurance system
Legal status	pilot (trial measures, 2022–)	established statutory insurance

Figure 1 Occupational Injury Protection (Zhiye Shanghai Baozhang), the Pilot, Set Against Standard Work-Injury Insurance (Gongshang Baoxian) across seven Design Dimensions

Note: The pilot detaches eligibility, funding and the contribution base from the employment relationship that the standard scheme requires.

3.3 The Per-Order Risk-Sharing Logic

The funding mechanism follows from this decoupling. Contributions are not calculated from total wages, and they do not presuppose a labour relationship. Instead they are levied per order and paid by the platform [4-5]. Each completed task carries a small charge into the fund. The base of the levy is the transaction, not the pay packet, which keeps the scheme consistent with its refusal to treat the worker as an employee.

This per-order base does three things at once. It spreads cost thinly across a very large volume of transactions, so that no single order bears much weight while the pooled fund still grows. It makes platforms internalise a risk they help create, because the firms that set delivery times and route assignments are the ones that pay. Algorithmic pacing pushes riders to move faster and take more orders, which raises injury risk; charging per order ties the cost back to the activity that generates it. The firm that designs the incentive bears part of its consequence. And it sidesteps the classification fight entirely. The levy attaches to orders, so there is no need to settle whether a worker is an employee before money flows into protection. Coverage can begin while the legal status question stays unresolved.

There is a further fit between the levy and the work itself. Platform earnings are piecework by nature. A rider is paid by the order, and a driver by the trip, so order volume is already the unit through which money moves. A charge per order rides on the same metering the platforms run for payment, which keeps collection simple and auditable. The fund grows in step with the activity it insures. Busy periods produce more orders, more exposure, and more contributions at once, so revenue tracks risk rather than drifting away from it.

The result is an instrument with both an actuarial and a political rationale, joined in one design. Actuarially, a transaction-based charge gives a workable contribution base where a wage base is absent or disputed, and it scales naturally with the volume of risky activity. Politically, it lets the state extend injury cover to platform workers without reopening the contested question of their status, and without imposing the full weight of employer obligations on the firms. It also places the cost on the firms rather than on workers who can least afford a deduction. The per-order logic is what allows protection to proceed without employment.

4 IMPLEMENTATION AND EFFECTS

4.1 Scheme Architecture

The scheme arrived in two instruments, issued months apart. The founding notice came from MOHRSS together with ten departments in December 2021 [4]. It set out the Measures for Occupational Injury Protection of Workers in New Forms of Employment (Trial) and fixed a launch date of 1 July 2022. A second piece of regulation, issued by MOHRSS and the State Taxation Administration in April 2022, handled the operational detail. It governed how contributions would be collected and how the tax authority would assist. The division of labour is itself revealing. The first document sets policy; the second wires it into the state's existing collection machinery.

The core design departs sharply from standard work-injury insurance. Contributions are levied per order rather than on total wages (show as Figure 2). The platform pays them, not the worker. At the heart of the whole construction, the scheme does not require a recognised labour relationship as a condition of coverage [4]. A worker is protected because an order was completed, not because an employment contract exists. This keeps the funding base consistent with the scheme's refusal to treat platform workers as employees. The contribution base is the transaction, and the trigger for protection is the activity, not the status.

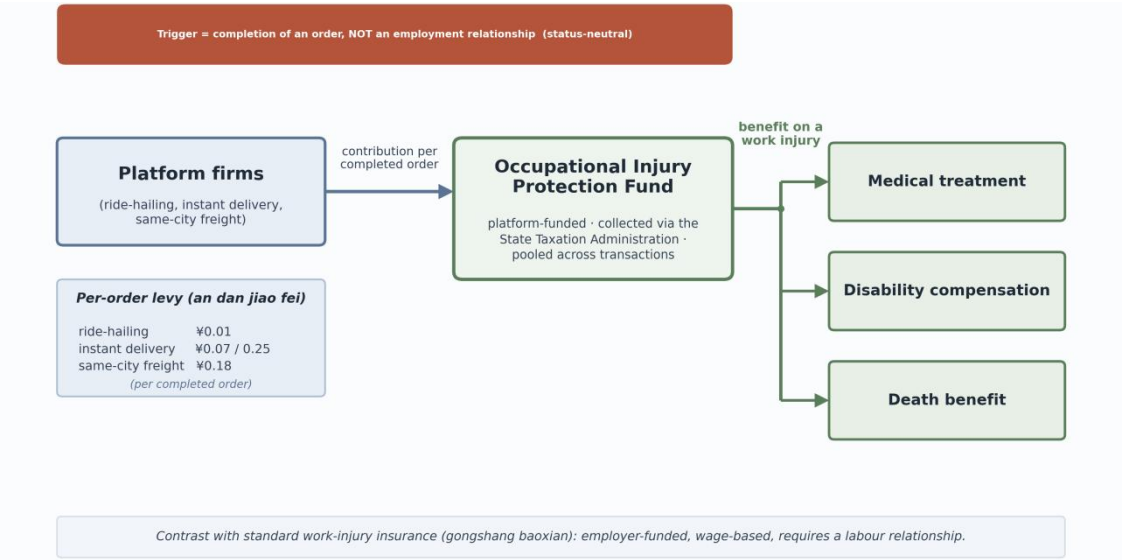

Figure 2 The Per-Order Funding Mechanism

Note: Platforms pay a small contribution on each completed order into a pooled fund, collected through the State Taxation Administration, which then pays injury benefits to workers. Coverage is triggered by the completed order rather than by an employment relationship.

What the protection covers is conventional in substance even if its funding is not. The scheme provides for medical treatment after an injury, compensation for disability, and benefits in the event of death. It reaches occupational injury across that full range, including major and fatal cases. So the worker who is hurt on a delivery, left disabled, or killed in a road accident falls within the same instrument. The novelty lies in how the money is raised, not in the kinds of harm that are recognised.

Two instruments and a phased start gave the scheme an unusually clear sequence. The December 2021 notice announced the design and the start date. The April 2022 regulation supplied the collection rules. The 1 July 2022 launch then turned text into a running system. This staging let the administering bodies settle the mechanics before any worker filed a claim. It also let the seven provinces prepare local procedures in parallel. The gap between announcement and launch was short, but it was used to build the plumbing the scheme would need.

The original perimeter was deliberately narrow. The trial ran in seven provinces and municipalities: Beijing, Shanghai, Jiangsu, Guangdong, Hainan, Chongqing and Sichuan. It covered four industries: ride-hailing, food and takeaway delivery, instant delivery, and same-city freight. And it bound seven named platform firms. These were Caocao Mobility, Meituan, Ele.me, Dada, Shansong (FlashEx), Huolala (Lalamove) and Kuaigou Dache (GogoX). Naming the firms one by one matters. It made the obligations concrete and enforceable from the first day, and it captured the dominant operators in each sector, so the trial caught the bulk of real orders rather than a fringe.

The reliance on the tax authority for collection is a quiet but telling feature of the design. Standard work-injury insurance is administered through employer payroll. The pilot has no payroll to draw on, since it disclaims the employment tie. So the April 2022 regulation routes collection through the State Taxation Administration, which already meters platform transactions. Contributions are gathered alongside the data the platforms report for tax. This piggy-backing keeps administration light and makes the per-order levy auditable against records the firms must keep anyway. The scheme borrows an existing pipe rather than building a new one, which is part of why it could move from notice to operation inside a year.

4.2 The Expansion Trajectory

The pilot then grew along the path its design anticipated. In April 2025, MOHRSS and nine departments issued the Notice on Expanding the Pilot, carrying the reference Renshebufa [2025] No. 24 and dated 22 April 2025 [5]. It took effect on 1 July 2025. The notice added ten provinces to the original seven: Tianjin, Hebei, Liaoning, Zhejiang, Anhui, Fujian, Shandong, Hubei, Guangxi and Ningxia. That brought the total to seventeen (Figure 3). It also tidied the industry categories, merging the separate "takeaway" heading into a consolidated "instant delivery" industry. And it brought new platforms within scope, among them Didi Chuxing, SF City (Shunfeng Tongcheng), Didi Freight and Manbang.

The 2025 notice also published benchmark contribution rates per order, which the founding instrument had left unstated in public terms. Ride-hailing carries a benchmark of 0.01 yuan per order. Instant delivery is set at 0.07 or 0.25 yuan per order, reflecting different risk profiles within that category. Same-city freight is set at 0.18 yuan per order. These figures show how thinly the charge spreads. The cost of any single order is a fraction of a fen or a few fen, yet the pooled fund grows with the volume of activity. The same notice laid out a phased timetable. The plan is to extend the scheme to all thirty-one provinces plus the Production and Construction Corps in 2026, and to explore further high-risk industries in 2027.

The shape of this expansion repeats the pilot's logic. The original seven sites were the dense, administratively capable regions where the design could be stress-tested. The ten added provinces broaden the geography without abandoning the staged method. The centre still controls the perimeter, and each enlargement follows evidence from the prior phase rather than a leap to national coverage. The merger of takeaway into instant delivery shows the same learning at work. A category that proved hard to keep separate in practice was simplified, which eases both classification and collection.

The enrollment figures trace a steep climb across this period. Coverage exceeded 8.866 million workers by 30 June 2024 [39]. By June 2025, the original seven provinces alone reported 12.3457 million participants [40]. By the end of 2025, cumulative national enrollment had reached 25.1 million, a figure announced at the MOHRSS press conference of 27 January 2026 [6]. The trend is unmistakable. Within roughly eighteen months the covered population roughly tripled, and the expansion of provinces and platforms tracks the growth in numbers. The figures are not strictly comparable, since one is a seven-province count and another is a cumulative national total. Even allowing for that, the direction is clear and the scale is large.

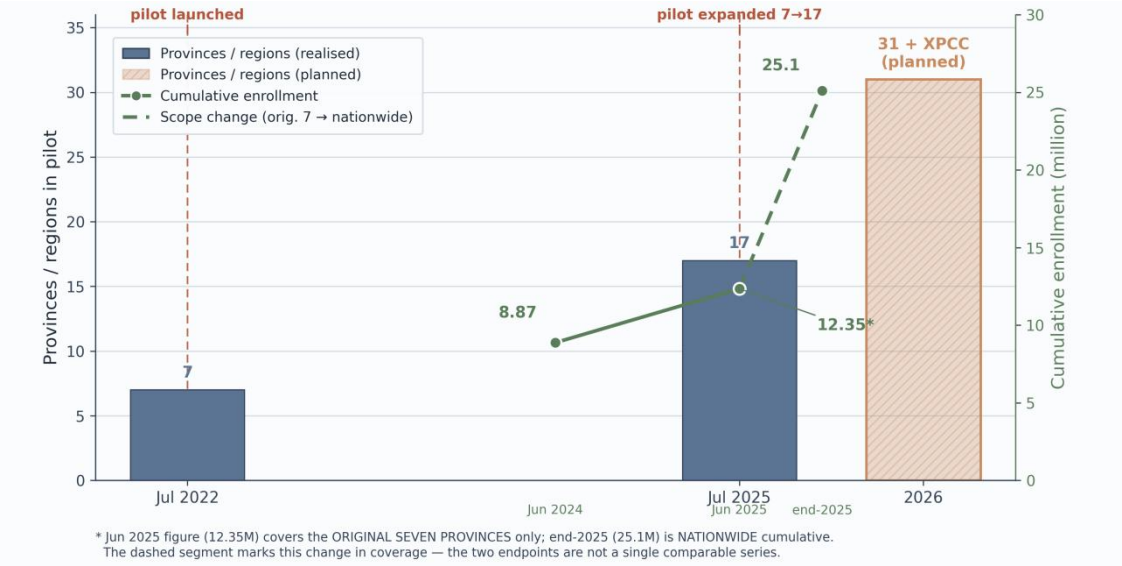

Figure 3 Geographic Scope and Cumulative Enrollment, 2022 to 2026.

Note: The pilot widened from seven provinces to seventeen in July 2025, with nationwide coverage planned for 2026. The June 2025 enrollment figure covers the original seven provinces only, whereas the end-2025 figure is nationwide, so the two are not a single comparable series. Political and external endorsement reinforced this momentum. The 2025 Government Work Report urged the authorities to advance the pilot's expansion [7]. The 2026 Government Work Report returned to the theme, calling for the scheme to be advanced "steadily and orderly" [8]. The choice of words is worth marking. It signals continued backing alongside a note of caution about pace. Beyond the domestic record, the ILO recognised the pilot as a good practice in social security [9]. That recognition gives the experiment standing in international forums and frames it as a model others might study.

4.3 What the Evidence Shows

The most concrete result is one of architecture rather than outcome. By making coverage compulsory and funding it per order, the scheme overcomes a failure that earlier voluntary arrangements could not. Zhang and Liu document how voluntary social security for gig workers struggled with weak uptake [41], because workers discounted future risk and platforms had little reason to enrol them. A mandatory, platform-funded levy removes that choice from both sides. Enrollment is not something a worker must opt into; it follows from the order. This design change, more than any single statistic, explains why participation has scaled so quickly.

The published evidence so far is mostly about that participation and the policy's fit. Wu et al. examine enrollment and how the scheme operates in practice [42]. Du et al. assess the policy's adaptability [43], asking how well its design matches the conditions of platform work and where it bends under strain. Du and Wang offer an assessment aligned with the ILO's reading [44], placing the pilot within international social-security standards. Together these studies build a reasonable picture of design and uptake. They show a scheme that recruits workers at scale and broadly suits the work it is meant to cover. The official figures and the external endorsement point the same way [6,9]. On the question of reach, the scheme can fairly be called a success.

Honesty about the limits of this evidence is necessary. Almost all of it concerns enrollment, design and adaptability, not the things that ultimately decide whether protection is real. We know far less about claims. How many injured workers actually file, how fast claims are processed, and how often they are refused remain thinly documented in the public record. Benefit adequacy is similarly obscure. Whether the disability and death benefits are sufficient, and how they compare with standard work-injury awards, is hard to establish from what has been published. Outcomes for injured workers, in short, sit largely outside the current evidence base.

This gap is partly a function of timing. The pilot is young, and serious injuries take time to work through treatment, assessment and payment. Robust claims data may simply not exist yet in usable form. But the gap is also a research problem. Enrollment is easy to count and easy to report, so it dominates the public account. Claims experience is harder to collect and less flattering to publicise, so it lags behind. The result is an evidence base that is strong on the front door and weak on the back. We can see who is signed up far better than we can see who is paid.

The distinction matters for any verdict on the scheme. A scheme can enrol millions and still fail those who are hurt if claims stall or payments fall short. Coverage on paper is not the same as protection in practice. The enrollment record is genuine and impressive, but it answers a narrower question than the one that finally matters. Whether the pilot delivers when a worker is injured remains, for now, an open question that the published record cannot settle.

5 THE PILOT IN INTERNATIONAL PERSPECTIVE

Other countries have wrestled with the same problem China now confronts: how to bring platform and non-standard workers inside social protection that was built for stable employment. The answers differ by legal tradition and political settlement. Across major European states, access to protection still turns largely on employment status and contribution history, which leaves intermittent and disguised self-employed workers thinly covered [45]. The European policy debate has therefore concentrated on the classification question. It asks whether platform workers are employees, and what rights follow if they are reclassified [46]. This framing makes protection a by-product of legal status rather than a freestanding entitlement.

Denmark takes a different route through flexicurity. There, generous and largely tax-financed benefits are paired with light dismissal rules, so workers move between jobs without losing their safety net [47]. The Danish model decouples income security from any single employer, but it does so through collective agreements and broad public schemes rather than through a charge tied to platform work itself. Coverage is wide because the welfare state is wide, not because the gig transaction has been singled out for a levy.

The evidence on actual coverage is sobering. Many self-employed and non-standard workers are nominally eligible for protection yet remain outside it in practice, because contributions are voluntary, thresholds are high, or enrolment is left to the worker [48]. These de-facto gaps matter more than formal entitlement. A scheme that exists on paper but reaches few people offers little to an injured rider. The gap between legal eligibility and real coverage is the recurring weakness across the comparative picture.

At the level of international norms, the ILO's social protection floor sets a different benchmark again. It calls for a basic, universal set of guarantees that do not depend on employment status [11]. Yet the politics of building such floors are contested, and progress has been uneven, shaped by fiscal capacity and by competing ideas about who deserves protection [49]. The floor is a multi-risk standard. It speaks to health care, income security across the life course, and protection against several contingencies at once, not to one hazard in isolation.

Table 1 sets the Chinese pilot beside these alternatives. The pilot stands alone in pairing a transaction-based, platform-funded, mandatory contribution with indifference to employment status. It also stands alone in covering a single risk, where the other models reach for broad, multi-risk floors.

Table 1 Approaches to Extending Social Protection to Platform and Non-Standard Workers, Compared

Approach	Basis of coverage	Funding	Mandatory	Risk breadth	Decoupled from employment status
China: occupational injury protection pilot	completed work order (activity)	platform, levied per order	Yes	single risk (injury)	Yes
EU: reclassification or presumption route	employment status, once reclassified	employer	follows employment	broad (employee package)	No, works through status
Denmark: flexicurity	residence and broad public schemes	tax-financed, collective agreements	near-universal	broad, multi-risk	Yes, through universalism
ILO: social	residence	general revenue,	normative standard	broad, multi-risk	Yes, by design

Approach	Basis of coverage	Funding	Mandatory	Risk breadth	Decoupled from employment status
protection floor (norm)	(universal floor)	mixed			

Sources: Sieker [45]; Daugareilh [46]; Jacqueson [47]; Immervoll et al. [48]; Behrendt et al. [11]; Seekings [49]; MOHRSS et al. [4].

Against this backdrop, China's design has no close analogue. Most comparator systems do one of two things. They extend an existing employee scheme to platform workers, usually after a fight over classification, or they rely on voluntary and means-tested arrangements that workers must opt into. China does neither. Its occupational injury protection is mandatory, funded by the platform, and indifferent to whether a labour relationship exists. The charge attaches to the order rather than to a person's employment status. In effect, the scheme internalises injury risk at the level of the transaction. Each delivery or ride carries its own small contribution, and protection follows the work as it happens.

This transactional logic is what makes the Chinese case distinctive. The decoupling that flexicurity achieves through broad public finance, China achieves through a per-order levy on the platform. The decoupling that European reclassification debates seek through legal status, China sidesteps by making status irrelevant to coverage. Du and Wang read this as a deliberate move to protect the worker without first resolving the employment question [44]. The ILO has recognised the pilot as a good practice in social security [9]. That recognition signals that a contribution model untethered from the labour relationship can deliver real coverage at scale, which the comparative evidence on voluntary schemes suggests is hard to achieve.

The contrast should not be overstated. China's scheme covers a single risk. It protects against occupational injury, including disability and death, but it does not touch unemployment, old-age income, or general health beyond the injury itself. The international debate, by contrast, concerns broad floors that span many contingencies. The ILO standard and the European discussion both assume that protection means more than one guarantee. So the decoupling China has achieved is real, but partial. It has severed protection from employment status for one hazard, while the wider questions of multi-risk security for platform workers remain open. A system that solves the injury problem cleanly still leaves a worker exposed to the contingencies that fuller floors are meant to cover. That is the measure of both the pilot's achievement and its limits when set beside its international peers.

6 GAPS AND REFORM PATHWAYS

The pilot solves one problem well and leaves several others open. It is, by design, a single-risk scheme. It covers occupational injury, including treatment, disability and death, but it does not touch pension, medical or unemployment insurance. A rider who is hurt at work now has a route to compensation. The same rider has no contributory pension, no portable medical cover beyond residual residence-based schemes, and no protection against losing the work itself. The broader exclusion of platform labour from China's standard social-insurance package therefore persists. Tian et al. document how the social-insurance system has long been organised around the formal labour relationship [31], which most platform workers lack. Behrendt et al. make the wider point that injury cover alone does not amount to social security [11]; it is one branch among several. The pilot has built one branch. The rest of the structure is still missing.

A second gap concerns what happens after enrolment. Coverage figures are now large. Cumulative national enrolment passed 25.1 million by the end of 2025 [6]. But coverage is not the same as protection delivered. Benefit adequacy, the speed and fairness of claims handling, and the resolution of disputes are all thinly evidenced. We know how contributions are levied and roughly how many workers are enrolled. We know much less about how a typical claim moves from accident to payment, how often claims are contested, and whether award levels track the real costs of injury. Wu et al.] note that the operational detail of the scheme has outpaced independent assessment of its outcomes [42. Du et al. point to the same evidentiary thinness around dispute processes [43]. An enrolment count answers a different question from a settlement record. A worker reads the scheme through the second, not the first. Without published outcome data, judgements about whether the scheme protects workers in practice, rather than on paper, remain provisional.

A third gap is legal. The pilot sits on top of an unsettled question about who these workers are. China has experimented with the category of the "incomplete labour relationship", which sits between employment and self-employment. Injury cover can be attached to that intermediate category without first deciding it. That is part of the scheme's cleverness. But it also means the worker's wider legal status stays unresolved. Ke and Xie trace the conceptual strain in trying to fit platform work into existing labour-law categories [29-30]. Zheng and Su show how the resulting ambiguity shapes the rights workers can actually claim [26]. Decoupling injury cover from employment status solved an immediate exclusion. It did not decide whether these workers are employees, contractors, or something in between. Other entitlements still hinge on that question. Injury protection rests on a classification that has not been settled, and that unsettled base limits how far the protection can extend.

Portability is a fourth weakness. A worker who switches platforms, or moves between provinces, may not carry continuous cover. The scheme is organised per platform and was first rolled out province by province, so coverage can break at exactly the moments when platform workers are most mobile. Many riders hold more than one app and move between them within a single day. Each switch is a potential seam in coverage. The migrant dimension sharpens this. Many riders and drivers work far from where their hukou is registered, and the hukou system still shapes access to local

services and benefits. Tian et al. [31] describe how the residence-registration system interacts with social-insurance entitlements to disadvantage internal migrants. The pilot's per-order, platform-funded design avoids the wage-base and residence tests that ordinarily exclude these workers, which is its strength. Yet a scheme that does not travel cleanly across platforms and regions will leave the most mobile workers with the thinnest continuity of protection.

The fifth gap is institutional, and it bears on all the others. The scheme is still a pilot. China's experimentation model can produce durable national policy, but the scaling stage is where pilots are most fragile. Song and Li examine how social-policy experiments in China are escalated [37-38], and where they lose momentum. Heffer and Schubert caution that experimental programmes can stall [35], be diluted as they spread, or be captured by the interests that administer them. The risk here is not abstract. A measure that works in seven provinces under close central attention may weaken when stretched across thirty-one provinces and the Production and Construction Corps, with uneven local capacity and varied fiscal room. Each scaling step adds administrators whose incentives may diverge from the original design. Pilots also lack the legal hardness of statute; they rest on departmental notices that can be paused or quietly narrowed. This is why legislative anchoring matters, not as a formality, but as the difference between a programme and an entitlement.

These gaps point toward a set of reform pathways. The logic running through them is the move from experiment to permanent institution. The first pathway is to convert the pilot into settled law as the national rollout proceeds. The 2026 expansion to all thirty-one provinces and the Production and Construction Corps gives a natural moment to anchor the scheme in legislation rather than in renewable notices [5]. The 2026 Government Work Report's call to advance the pilot "steadily and orderly" reads as an invitation to consolidate, not merely to widen [8]. The phrasing is itself a signal in the experimentation tradition: a measure is being prepared for the transition from local trial to general rule. Legislative footing would lock in entitlements, define obligations clearly, and protect the scheme from the drift at the scaling stage that the experimentation literature warns about.

The second pathway is to move, over time, from a single branch toward a portable, multi-risk floor. Injury cover is a sound first branch precisely because the risk is acute and the per-order funding model fits irregular work. The same logic could be extended, in stages, to other risks. Behrendt et al. argue for protection floors that do not depend on a standard employment contract [11]. Immervoll et al. show how benefit design can be detached from the binary of employee and self-employed [48], which is the binary platform work keeps breaking. A floor built around the worker, and carried across platforms and provinces, would address both the single-risk and the portability gaps at once. This need not happen quickly. It does need a direction.

The third pathway is to strengthen what the scheme already promises. Adequacy of benefits and the quality of claims handling deserve as much attention as enrolment numbers. Clear timelines for claims, accessible dispute channels, and published data on outcomes would let the scheme be evaluated on protection delivered, not just on coverage counted. Such data would also let researchers test the scheme against its stated aims, closing the evidence gap that Wu et al. and Du et al. describe [42-43]. The fourth pathway follows from the 2026 standardisation. National rollout is a chance to even out provincial variation, so that a rider in one province does not receive materially weaker handling than a rider in another. The 2025 expansion already merged the takeaway category into a consolidated instant-delivery industry and set benchmark per-order rates, which points the way. Standardising procedures, benefit levels and data reporting would turn a patchwork of pilots into a single institution.

Read together, these pathways describe the same arc: from experiment to institution (Figure 4). The pilot has proven the policy logic. The next stage is to harden it. The ILO's recognition of the scheme as a good practice gives external weight to that effort, but recognition is not consolidation [9]. Whether China's experimentation model delivers a permanent, portable, multi-risk floor, or stalls at a single-branch pilot, will be decided in the scaling and legislation now under way.

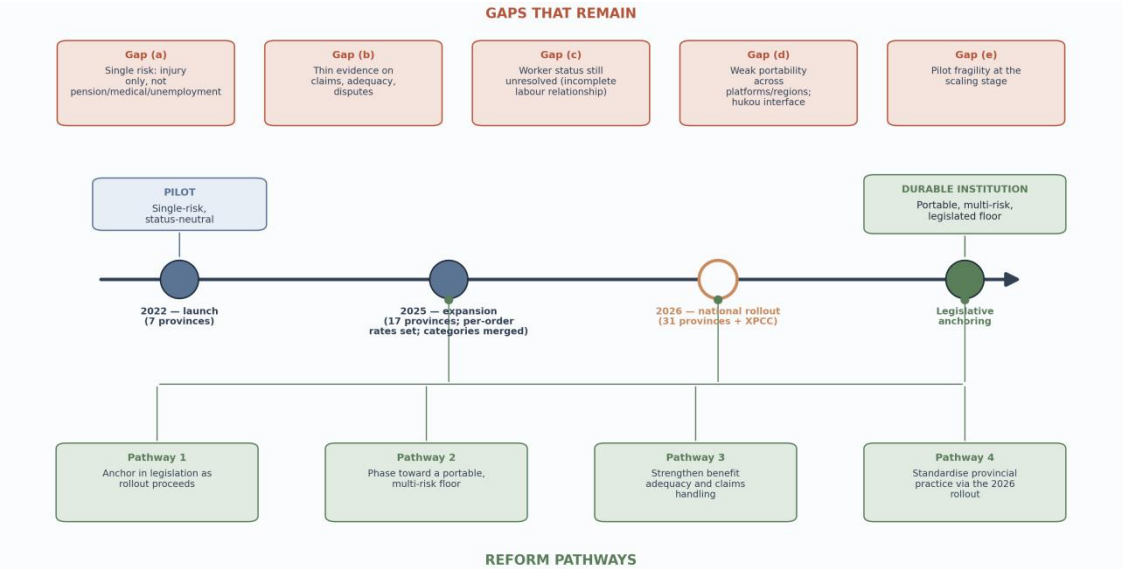

Figure 4 From Pilot to Institution

Note: The realised milestones (2022 launch, 2025 expansion, and the planned 2026 national rollout) run along the central track. The gaps that remain sit above it, and the reform pathways that would close them below, leading toward a portable, multi-risk, legislated floor.

7 CONCLUSION AND RESEARCH AGENDA

China's occupational injury protection pilot answers a question that has unsettled social policy across many countries. Can a worker be protected against a work risk without first being recognised as an employee? The pilot shows that the answer can be yes. It detaches a core protection from the labour relationship. It funds that protection at the level of the transaction rather than the wage. And it scales. Cumulative enrollment reached 25.1 million nationwide by the end of 2025 [6]. This is the substance of "protection without employment". The decoupling is deliberate, not accidental, and the per-order contribution makes it operational.

The pilot also illustrates how Chinese policy is made. A measure begins in seven provinces and four industries, with a small set of named platforms. It is observed, adjusted, and then widened to seventeen provinces with new firms and a consolidated industry definition. National policy documents then endorse the direction. The case is an instructive instance of local experimentation hardening into a national programme [36]. External recognition followed, with the ILO treating the design as a good practice in social security [9]. For other states facing platform work, the model is at least legible and potentially exportable.

The limits should be stated plainly. The scheme covers a single risk. It does not touch pensions, health insurance for non-work illness, or unemployment. It is mid-scaling, still short of the planned reach of all thirty-one provinces. Most of all, it leaves the worker's wider status unresolved. A rider remains, for most purposes, a non-employee who now carries one injury protection. Protection without employment solves a narrow problem while preserving the classification that created the problem.

A research agenda follows from these gaps. First, the evidence base must move beyond enrollment counts. Outcome and claims data are needed: how many injuries are reported, how many claims are paid, how quickly, and at what rate of denial. Enrollment shows reach, not delivery. Second, benefit adequacy deserves direct study. Whether the disability and death benefits meet a worker's actual loss is unknown from the published figures. Third, the per-order contribution invites a behavioural question. A levy attached to each transaction could change how platforms price, route, or schedule work, and these second-order effects merit measurement. Fourth, the diffusion potential should be examined comparatively. Whether transaction-level, employment-decoupled funding can be transplanted to other legal and fiscal systems is an open empirical question. Fifth, the status question remains. Single-risk schemes may relieve pressure for broader reclassification, or may serve as a first step toward it, and the long-run effect on workers' standing within social protection is not yet settled [11]. The pilot has proved a concept. The harder work is to learn what it actually delivers, and whether the gains it leaves untouched can be reached by the same route.

COMPETING INTERESTS

The authors have no relevant financial or non-financial interests to disclose.

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