



International
Labour
Organization



Monitoring of measures to prevent
and tackle labour exploitation

Training package

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Foreword

This “Training of Trainers” programme on monitoring the performance of actions to prevent and tackle labour exploitation in agriculture was developed by the International Labour Organisation (ILO) Office for Italy and San Marino.

It aims to strengthen the capacity of public officials responsible for planning and implementing policies and actions to prevent and tackle labour exploitation in agriculture. It also aims to monitor the performance of initiatives and projects implemented in this context at national, regional, and local levels.

The contents were developed based on the training programmes prepared for national and regional authorities. The methodology was developed to adapt the programme to different national, regional, and local contexts and to respond to specific training needs and expectations.

The training programme was implemented within the framework of the Action “Support for strengthening inter-institutional governance on labour exploitation”, carried out by the ILO, the European Commission (EC) and the Ministry of labour and social policy (MLSP) to support institutional capacities to formulate, develop and implement coherent strategies and policies to prevent and tackle the phenomenon of exploitation in agriculture.

Introduction

The “Three-year plan to tackle labour exploitation and unlawful recruitment in agriculture (2020–2022)” sets out the national strategy for implementing measures to prevent and tackle labour exploitation in agriculture based on the operational guidelines contained in Law No. 199 of 2016, which sets the provisions “to address the phenomenon of undeclared work, labour exploitation and wage adjustment in the agricultural sector”.

The strategy is structured on four strategic pillars (prevention, enforcement, protection and assistance for victims, and social and labour reintegration) and implemented through ten priority actions involving different administrations at the central, regional, and local levels.

As part of the implementation of the Three-year plan, the Ministry of labour and social policies (MLPS) — with the technical support of the International Labour Organisation (ILO) Office for Italy and the European Commission (EC) Directorate-General for Reform — promoted the development of a system for monitoring the performance of priority actions. This system was implemented — by the MLPS and the EC and ILO technical assistance programme “Support for strengthening inter-institutional governance to tackle labour exploitation in Italy” — through the organisation of a series of training activities aimed at national and local government officials on the topic of monitoring the performance of priority actions to tackle labour exploitation in agriculture.

The training programme on “Monitoring the performance of actions to prevent and tackle labour exploitation in agriculture” is aimed to support the dissemination and learning of monitoring techniques for policies and actions to prevent and tackle labour exploitation. In particular, the training activities aim at the following:

- Strengthen the capacity of institutions, operating at national and local levels, to monitor the performance of policies and actions to prevent and tackle labour exploitation in agriculture through the training of civil servants.
- Promoting tools and good practices to monitor the performance of policies and measures to prevent and tackle labour exploitation.
- Training staff dedicated to monitoring publicly funded project initiatives on preventing and tackling labour exploitation.

- Sharing methodologies to assess the interventions' effectiveness, efficiency, and sustainability to prevent and tackle labour exploitation.
- Training a group of trainers to be assigned to develop and strengthen the skills of civil servants in monitoring and evaluating interventions related to tackling labour exploitation.

The programme is addressed to civil servants of public, national, and local institutions involved in developing, implementing, and monitoring the priority actions foreseen in the Three-year plan. In this context, it represents a training tool for trainers to strengthen the operators' skills in managing, implementing, and monitoring measures and projects to prevent and tackle labour exploitation in agriculture and other economic sectors. It also provides a collection of information on project interventions at the local level financed by the MLPS and other institutions.



PART A

METHODOLOGY MODULES



Module A1

How to develop a training programme on monitoring and evaluation

How to develop a training programme on monitoring and evaluation

The The “[Three-Year Plan to tackle labour exploitation and unlawful recruitment in agriculture \(2020–2022\)](#)” is a national implementation strategy consisting of measures aimed at preventing and tackling labour exploitation in agriculture. It enforces [Law No. 199 of 2016](#) on tackling the phenomena of undeclared work, labour exploitation in agriculture and wage adjustment in the agricultural sector. The strategy is structured on four pillars (prevention, enforcement, protection and assistance for victims, and labour and social reintegration) and implemented through ten priority actions involving different administrations at central, regional, and local levels.

As part of the implementation of the Three-year Plan, the Ministry of Labour and Social Policies (MLPS) — with the technical support of the International Labour Organisation (ILO) Office for Italy and the European Commission’s DG Reform — promoted the development of a system to monitor the performance of priority actions. It identifies indicators, quantitative and qualitative outcomes to be achieved, baseline data and data sources. It also includes the collection of information on project interventions at the local level that the MLPS and other ministries finance.

The MLPS and the EC and ILO technical assistance programme “[Support for strengthening inter-institutional governance to tackle labour exploitation in Italy](#)” developed a programme of training activities aimed at strengthening the capacity of national and regional government officials to monitor the performance of the initiatives aimed at preventing and tackling labour exploitation. The programme offers suggestions to analyse training needs and the technical content of training sessions. It contains guidelines for trainers on training techniques for adults.

The first step to organise a training programme to monitor the performance of initiatives to prevent and tackle labour exploitation in agriculture is to collect and analyse the training needs of participants, which can be done by administering a questionnaire.

The context

Training needs analysis

Objectives and contents

The training needs questionnaire generally consists of two parts. The first part aims to collect some background information on the participants (age, gender, education), on the knowledge already acquired on the topics covered during the training course and on the task currently being performed (areas of competence). The second part aims to collect information on individual expectations regarding the training course and the topics to cover in depth.

In addition to the training needs questionnaire (or as a validation activity of the outcomes obtained through the questionnaire), trainers may organise a discussion (focus group) with some potential participants to receive information on the topics/areas to discuss as a priority during the training course. An example of a questionnaire for gathering information on training needs is enclosed in this training package.

The training programme's objective is to support the learning techniques for monitoring the performance of policies and measures to prevent and tackle labour exploitation.

The programme includes eight training modules. Modules 1 and 2 can be combined into one training session if participants are already familiar with the exploitation indicators and the content of the Three-year Plan. Module 8 (Ex-post Evaluation) is optional for participants interested in the topic.

Module B1**What labour exploitation is and how it can be identified**

This module aims to present the different forms of labour exploitation and indicators and indicators for its identification. It provides concrete examples of the different types of exploitation with an indication of some of the prevention and counteracting instruments tested in other contexts.

Module B2**The Three-year Plan to tackle labour exploitation and unlawful recruitment in agriculture**

This module focuses on the Three-year Plan to tackle labour exploitation in agriculture. It overviews the Plan's ten Priority Actions and its implementation and monitoring tools. It provides information on its development, approval, and implementation status.

Module B3**Introduction to monitoring and evaluation**

This module aims to share the different monitoring and evaluation methodologies and the principles guiding their implementation with participants.

Module B4**Monitoring the performance of the Three-year Plan**

This module provides practical tools to monitor the strategies developed to prevent and tackle labour exploitation. It focuses on defining outcome indicators and their measurement and organising data collection activities.

Module B5**Monitoring the initiatives to prevent and tackle labour exploitation**

This module identifies the monitoring tools for interventions to prevent and tackle labour exploitation at the regional level and how to share and integrate data.

Module B6**Monitoring the performance of projects to prevent and tackle labour exploitation**

This module analyses the tools available for monitoring the performance of projects being implemented and for the inclusion of project contributions in the Regions' performance monitoring system and the Three-year Plan to prevent and tackle labour exploitation.

Module B7**Collection and analysis of monitoring data**

This module aims to provide participants with practical tools to analyse performance data, identify any deviations and subsequent actions to be implemented to ensure objectives are met and prepare monitoring reports.

Module B8**Ex-post evaluation of interventions to tackle labour exploitation**

This module aims to review with participants the various ex-post evaluation methods available and discuss their use for actions to prevent and tackle labour exploitation.

Methodology and training programme materials include analytical fact sheets on the training modules (with objectives, technical content, and references to other material) and guidelines for interaction between trainers and participants ('Q&A' sessions). Training courses can be organised both in-presence and distance learning.

For face-to-face activities, guidelines for trainers have been drawn up for the organisation of training content, which includes techniques for training adults and procedures for the assessment of training activities.

For online activities, planning opportunities for interaction between participants (exchange of information and experiences) is necessary, thus making the training activity more stimulating and interactive.

The training programme is addressed to civil servants of national and local public institutions involved in developing, implementing, and monitoring initiatives to prevent and tackle labour exploitation directly and through coordinating project initiatives implemented by local authorities, social partner representatives and third-sector organisations.

The training process can be validated during the implementation of the eight modules through exchanges of experience between facilitators and participants.

At the end of the programme, trainers may decide to use an evaluation questionnaire.

Some suggestions on evaluating training activities are contained in Part II of this training package (Guidelines for Trainers).

Methodology

Participants' profile

Validation



Module A2

Guidelines for trainers

Guidelines for trainers

Knowing the participants' type and characteristics is crucial to a training seminar's success. This will enable trainers to focus the seminar on the participants' needs and expectations.

Learning objectives consist of sentences that clearly describe what participants will be able to do at the end of the training. They describe the expected outcomes of the training activity. Objectives help trainers to:

- Define what is expected to be achieved at the end of the seminar and how to implement it.
- Focus the seminar on the participants' needs.
- Understand whether the seminar is relevant and suitable for the participants.
- Choose contents and activities.
- Describe what the participants will be able to achieve at the end of the seminar.
- Evaluate the results obtained at the end of the training.

After setting the learning objectives, trainers are required to choose and/or develop the training material and techniques.

It is vital for trainers to be familiar with the material that will be used and with the main teaching methods.

These guidelines support trainers in choosing the content of training activities and related teaching methods. This information should be included in the planning of training sessions. In particular:

- Set the objectives expected to be achieved at the end of the programme.
- Prepare a programme description outlining goals and content.
- Explain concepts providing positive and concrete examples.
- Choose the most suitable teaching techniques to foster the acquisition of knowledge and skills (e.g., role plays, case studies and sharing of experiences among participants).
- Where possible, provide examples based on ideas and knowledge that are familiar to the participants to reinforce the correlation with real life.

Getting to know the participants

Defining learning objectives

Identifying criteria for the design of training activities

- Actively involving participants in activities (e.g., through group discussions, hands-on activities, question and answer sessions, and problem-solving activities).
- Devote sufficient time to the participants' discussions and practical activities.
- Make observations and include moments of interaction with participants to monitor the learning path and progress.
- Organise exercises to foster knowledge acquisition and skills ensuring that they become standard.
- Present a summary of each session, ensuring continuity between the previous and the next topic.
- Foster and provide a non-hostile and self-motivating environment.

Suggestions for conducting training programmes

Experienced and competent trainers

This section provides some suggestions to conduct the activities the training programme activities. The following boxes describe the advantages and disadvantages of the leading teaching methodologies.

Since they participate in the training programme for a specific purpose (i.e., to acquire knowledge and skills) and have limited time, they expect experienced and competent trainers who can effectively convey their knowledge. It is, therefore, essential that trainers are adequately prepared.

The practical application of the programme content

Participants expect training to provide knowledge and skills to be acquired and applied straightforwardly. Trainers are required to meet these expectations through preliminary research in the 'real world' and the subsequent practical application of concepts.

Trainers can also avail of qualified experts with an expertise in this area. The more relevant the programme is, the more the participants can learn. As a result, they will positively assess their participation in the programme, finding it useful and effective.

Beginning of training activities

How the training activities start will also set the tenor of the subsequent sessions. Trainers can use this opportunity to give a competent impression of themselves and the programme and create a productive learning environment. Although trainers cannot influence the participants' attitudes, they can positively impact them by trying to win their trust from the very beginning.

Welcoming participants

Welcoming the participants not only makes them feel appreciated but also give them a positive image of the trainers. A straightforward welcome phrase will suffice. For example, one could say: "On behalf of the Ministry of Labour, I wish to welcome you all to this seminar on monitoring and evaluating the Three-year Plan. I hope you will find it valuable and productive."

Introduction

Trainers should formally introduce themselves to confirm their professionalism. They can provide information on their education, main experiences, and qualifications and, finally, add personal details to build a personal relationship.

Trainers should explain the initiative's purpose and briefly describe what is expected of participants. They should outline the main objectives and ask participants about their expectations. This will help identify the participants' needs and understand which topics to focus on. These elements can be noted down on a whiteboard.

Trainers should explain the programme (e.g., what activities will be performed and when, how the trainers intend to organise the sessions, activities, timetable, and breaks). Participants may refer to the calendar of activities sent together with the invitation letter. In the event of changes, an updated calendar should be distributed.

If the training activity is held in person trainers should briefly describe the common areas available to participants (e.g., toilets, refreshment areas, smoking areas).

Trainers may ask participants to introduce themselves or propose some ice-breaking activities. The choice will depend on the objective the trainers wish to pursue, whether to acquire the information directly from the participants or to create an informal atmosphere. In the first case, trainers may ask each participant to tell their name and explain the reasons for their participation. If trainer believe that participants may feel uncomfortable introducing themselves, then they may propose another activity for the introductory session.

Ice-breaking activities can help trainers create an informal atmosphere and make participants feel at ease with the trainers and among themselves.

The aim is to help trainers create a positive and collaborative learning environment and a climate of openness to facilitate interpersonal relationships.

Ice-breaking activities boost group cohesion, especially when participants do not know each other and may feel shy and insecure.

Building and maintaining personal relationships is crucial for successful activities in a training programme. A good rapport results in more open interactions between trainers and participants and among participants.

Trainers can build a personal relationship in several ways, including:

- Calling participants by name when addressing them.
- Treat everyone with courtesy and respect.
- Be open and available. Invite participants to contribute to the sessions.
- Handle mistakes with grace and sensitivity.

The evaluation is an essential aspect of the training process and must be considered at the programme design stage. It provides trainers with helpful information and opinions on the effectiveness of the training. It relates directly to the objectives set in the training design phase that can be used to determine whether the goals have been achieved.

Explaining the purpose of the programme

Outlining the programme

Providing practical information

Introduction of participants

Ice breaking

Building a personal relationship

Evaluating the training programme

There are four levels of evaluation. The level chosen by trainers depends on the type of information they want to provide. The descriptions of the different levels of the evaluation supplied below can guide trainers in choosing which evaluation to use.

Evaluation of reactions

This type of evaluation aims to understand the participants' opinions on (i) the content of the training, including the clarity of the objectives, the effectiveness of the teaching methods, the duration and pace of the training; (ii) the knowledge and skills acquired; (iii) the material used (teaching materials and visual aids); (iv) the trainers and experts; and (v) the location of the training activities.

Evaluation of learning

The evaluation of learning concerns the level of knowledge and competence acquired by the participants concerning the programme content and the activities carried out during the training.

The level of learning can be evaluated through (i) participation in training sessions, (ii) the progressive evaluation of participants during activities (e.g., application of knowledge and skills during role-plays or case studies), (iii) short-answer questions, (iv) papers and observations offered during training sessions.

Outcome evaluation

Outcome evaluation is concerned with the impact the training had on participants. In other words, it analyses whether the programme produced the expected results (e.g., whether it effectively responded to monitoring and evaluation problems encountered by participants).

Performance evaluation

Performance evaluation analyses ex post the extent to which knowledge and skills acquired during training have been transferred (or applied) in a real-world context. Information for this type of evaluation can be gathered through (i) direct observation, (ii) supervisor interviews, (iii) performance analyses and (iv) participant reports. This type of evaluation requires time to elapse between the training activity and the evaluation.

Teaching methods

Face-to face lessons

Method	Advantages	Disadvantages
• The trainer presents the principles and concepts verbally, formally, or informally. • Formal lectures are mainly used to present information to large groups of participants. Communication is almost unidirectional (from trainers to learners). • Informal lessons involve active participation through questions and implementing a two-way communication process.	• It allows trainers to transmit information to a large group of participants quickly. • It is also a good introduction and a transition to other teaching techniques. • For example, trainers can use a frontal lecture to introduce a case study, summarise the results and knowledge learnt, and present the topic and subsequent activities.	• This method puts the burden of learning on the trainer and limits opportunities for participation and peer learning. • Trainers need more chances to understand whether they have successfully conveyed the information or understood the messages.

Asking questions

Method	Advantages	Disadvantages
• The trainer imparts knowledge and skills to the participants by formulating questions and answers. • The transfer can also take place by allowing participants to ask questions.	• It encourages participants to take an active part in the learning process. • It allows trainers to understand whether they are conveying the messages correctly. • Trainers can assess the participants' ability to assimilate the concepts discussed.	• It can be time-consuming. • Trainers must ensure that the questions asked are relevant to the topics covered and can contribute to effectively achieving the objectives. • It can induce dominant people to answer questions, discouraging the participation of shyer ones.

Discussion

Method	Advantages	Disadvantages
- Through discussion, participants are invited to participate in a forum where they can share their ideas. - The discussion can take place in plenary or groups. - Discussions must be targeted, focused, and aimed at achieving the set goals.	- It provides excellent peer learning opportunities. - Participants can share ideas and experiences, compare knowledge and opinions, and collectively analyse discussion points.	- It can be time-consuming and can lead participants to off-topic discussions. - Sound facilitation skills are required in this context.

Demonstration

Method	Advantages	Disadvantages
- The demonstration method aims to provide the concepts and information covered in the training course through practical and straightforward tools. - It is based on the principle that one learns best through practice. - Under the supervision of trainers, participants put into practice the principles and skills gradually acquired during the training activities.	- It allows participants to demonstrate their skills and to analyse whether the concepts have been correctly understood and applied. - It enables them to develop skills and boosts their self-confidence.	- It requires considerable preparation time and careful planning. - Trainers must ensure that the demonstration and practical parts are strictly consistent with real-life situations.

Case study

Method	Advantages	Disadvantages
• A case study is a studied representation of facts and/or descriptions of realistic situations that can be based on actual events. • Participants are asked to discuss these facts/situations in groups and identify the best course of action to take or a solution to be found.	• It helps to develop decision-making and problem-solving skills. • It also enhances peer-to-peer learning as participants can observe how different groups perceive and deal with the case, thus providing the entire audience with alternative solutions to a given problem.	• The development of a good case study takes time. • Some cases oversimplify a problem compared to the actual situation. • Once adapted to a real-life situation, the solutions identified may be only partially effective or completely ineffective.

Brainstorming

Method	Advantages	Disadvantages
• Brainstorming is a teaching method through which all participants are asked to contribute their ideas to solve a shared problem, considering various possible solutions. • The activities are adapted to the needs of the participants when the chosen problem is one they have routinely encountered in their daily lives.	• It fosters creative thinking, encourages full participation (all ideas are considered equally) and draws on the knowledge and experience of the group. • It creates a spirit of cooperation among the participants.	• It can be poorly targeted. • Participants may find it difficult to distance themselves from the reality they know. • If not managed well, it can lead to criticism and negative evaluations. The value for participants depends in part on their level of maturity.

Experts

Method	Advantages	Disadvantages
• Trainers may avail of experts with a high degree of expertise in the field. • These figures may have acquired these skills and knowledge through years of experience or higher levels of study or research in the field.	• It allows to customise the topics and break down participants' stereotypes.	• The expert may not be a good speaker. • In some cases, experts' personalities may overshadow the content.



PART B

THEMATIC MODULES



Module B1

**What labour exploitation is
and how it can be identified**

What labour exploitation is and how it can be identified

Learning objectives	At the end of the learning session, participants: • will be familiar with the definitions of the terms used to characterise the most severe violations of workers' human rights (forced labour, human trafficking, labour exploitation, and modern forms of slavery). • They will have acquired information on measures to prevent and tackle labour exploitation (areas of intervention and policies), indicators to identify labour exploitation, and the relevant regulatory and international framework.
Time required	Two hours
Teaching resources	Interactive session with questions and answers
Read more	• J. Fudge e D. McCann, <i>Unacceptable forms of work: A global and comparative study</i> (ILO, 2015). • ILO, <i>Human trafficking and forced labour exploitation. Guidelines for legislation and law enforcement</i> (2005). • European Union Agency for Fundamental Rights (FRA), <i>Severe labour exploitation: Workers moving within or into the European Union. States' obligations and victims' rights</i> (Vienna, 2015). • K. Skrivankova, <i>Between decent work and forced labour: Examining the continuum of exploitation</i>, Joseph Rowntree Foundation (York, 2010). • Eurojust, <i>Prosecuting THB for the purpose of labour exploitation. Report</i> (The Hague, 2015).

Introduction

This training module is divided into two parts. The first part explores the various forms that labour exploitation can take. The terms used to identify violations of workers' human rights, starting with the definitions provided in international treaties on forced labour and human trafficking and ending with specific words such as labour exploitation and modern forms of slavery, which, although commonly used, still have no unambiguous definition.

The second part of the module looks at the factors contributing to the increase in labour exploitation. It reviews policies for preventing and combating the phenomenon and protecting and assisting victims.

Definitions

International law does not offer a clear and unambiguous definition of 'labour exploitation'. Still, it defines some forms it can take such as forced labour, human trafficking for labour exploitation, and child labour.

Forced labour

The first international labour standard dealing with forced labour was adopted by the International Labour Organisation (ILO) in 1930. Convention No. 29 (Forced Labour Convention, 1930) defined forced labour as "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily". This definition:

1. Applies to all possible forms of forced labour, including slavery and slavery-like practices, debt bondage and human trafficking.
2. Includes all types of work, services and employment in any activity and sector (both formal and informal).
3. Consists of all forms of direct or indirect coercion, such as physical violence, psychological threats, non-payment of wages, or loss of rights or privileges.

ILO Convention No. 105 (Abolition of Forced Labour Convention, 1957) deals mainly with forced labour imposed by state authorities. It prohibits any form of forced or compulsory labour as a means of political coercion or education, punishment for expressing political or ideological opinions, mobilisation of labour power, labour discipline, and punishment for participation in strikes or discrimination.

Considering the persistence of forced labour practices worldwide, in 2014, the ILO adopted two new international standards to combat forced labour in the modern era.¹ Along with its recommendation, the Protocol to the Forced Labour Convention, 2014 (No. 29) complements existing international labour standards. It establishes the obligation of member states to prevent forced labour, protect victims and provide them with access to remedies (Box 1). It also emphasises the link between forced labour and trafficking in persons. In line with ILO Convention No. 29, the Protocol also reaffirms the importance of prosecuting perpetrators and ending their impunity.

¹ For estimates of the incidence of forced labour worldwide, see ILO, Walk Free, and International Organization for Migration (IOM): [Global Estimates of Modern Slavery: Forced Labour and Forced Marriage](#), Geneva, 2022.

Box 1: Protocol on forced labour

The Forced Labour Protocol requires Member States to take adequate measures to prevent and eliminate forced labour, protect victims through access to appropriate remedies, and sanction perpetrators. The measures — which should include specific actions against trafficking in human beings — should be based on the following elements:

- **Prevention:** Member States should implement preventive measures aimed at (i) analysing and addressing the causes and factors that increase the risk of forced labour; (ii) training, information and awareness-raising on trafficking and forced labour situations; (iii) extending the coverage and enforcement of labour law to all relevant workers and sectors; (iv) strengthening labour inspection and other services responsible for the enforcement of national laws; (v) protection against abuses arising from labour recruitment processes; and (vi) applying forms of due diligence to both the public and private sectors.
- **Protection:** The Protocol provides protection measures to (i) take effective action to identify, protect, and rehabilitate victims and (ii) protect victims from the consequences of unlawful activities carried out under duress.
- **Remedies:** Compensation schemes for moral and material damage must be available to ensure victims' access to adequate and effective remedies, such as compensation, regardless of their presence or legal status in the territory.

Source: [Protocol to the Forced Labour Convention, 1930](#) (No. 29).

In 2000, the UN General Assembly adopted the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children (also known as the 'Trafficking Protocol' or 'Palermo Protocol') to supplement the Convention against Transnational Organised Crime. The Protocol defines trafficking as 'the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion (....) for the purpose of exploitation'. Three elements must therefore be present to constitute a situation as trafficking in human beings:

1. An action (recruitment, transport, reception)
2. A means by which the action takes place (coercion, fraud, deception, abuse of a position of vulnerability), and
3. The purpose of exploitation.

Child labour is defined as a work activity that deprives children of their childhood and dignity and adversely affects their mental and physical development. ILO Convention No. 182 of 1999 on the Worst Forms of Child Labour affirms the need and urgency to adopt strategies for action to eliminate the worst forms of child labour as a top priority without losing sight of the long-term goal of eliminating all forms of child labour worldwide. ILO Convention No. 138 on the Minimum Age for Admission to Employment sets the minimum age at which children can be legally employed.

Trafficking in human beings for exploitation

Child labour

European standards

Several directives are in force in the European Union to prevent and combat labour exploitation and human trafficking and to protect the victims.

Directive 2011/36/EU on preventing and combating trafficking in human beings aims to prevent the phenomenon, prosecute traffickers, and protect victims. The directive sets minimum penalties for offenders and minimum standards for protecting victims, regardless of whether they cooperate with the justice system. Assistance to victims must include food and accommodation, medical care, legal counselling and translation and interpretation services. Although the directive requires Member States to ensure that victims have access to the compensation mechanisms established for victims of violent crimes, there are no provisions for compensation for unpaid overtime or back pay.

In the context of migration policy — and along the lines of the ILO Convention — three Directives aim to protect migrant workers from abuse and exploitation. Council Directive 2009/52/EC (Employers Sanctions) sanctions employers who employ third-country nationals without residence permits and enshrines the right of workers to report exploitative working conditions and to receive back wages.¹ This directive goes beyond illegal immigration and includes elements for protecting workers' rights, such as the right not to be exploited in the workplace.

Directive 2011/98/EU (Single Procedure for Residence Permit) establishes a single procedure for issuing residence permits for third-country nationals working in a Member State. It recognises the right of foreigners holding a valid residence permit to equal treatment, including pay, working conditions, health and safety, freedom of association and negotiation.² Directive 2014/36/EU (Seasonal Workers Directive) lays down the conditions of entry and residence of seasonal workers from third countries. These workers are entitled to equal treatment in the host country concerning working conditions (remuneration, working hours, holidays, and rest periods) and health and safety standards. The same equal treatment also applies to social protection (sickness, disability, and old age benefits), vocational training and access to public employment services.

Directive 2004/81 concerns residence permits issued to third-country nationals who are victims of trafficking. These should have a minimum duration of six months and give access to work. The issuance of the residence permit is subject to three requirements, namely: (i) the presence of the person in the territory of the Member State is helpful for the investigation and prosecution; (ii) the existence of a clear intention to cooperate expressed by the person concerned; and (iii) the severing of all links with the alleged perpetrators. The directive also provides victims access to accommodation, medical and psychological support, and legal aid.

Council Directive (2012)/29/EU lays down minimum standards on the rights, protection, and support of victims of violent crimes, with a particular focus on child victims and victims of gender-based violence. This directive also recognises victims' right to be informed and assisted during criminal proceedings.

Similarly, to the ILO Conventions, several Directives in the European Union aim to protect workers and ensure fair and just working conditions, which can be applied to protect workers from exploitation. The most relevant Directives are the Working Time Directive (2003/88/EC) — which provides for a maximum 48-hour working week, entitles workers to four weeks paid annual leave and requires daily and weekly breaks — and the 1989 directive on health and safety at work (89/391/EEC), which applies to all workers (not just employees), although it excludes domestic workers.

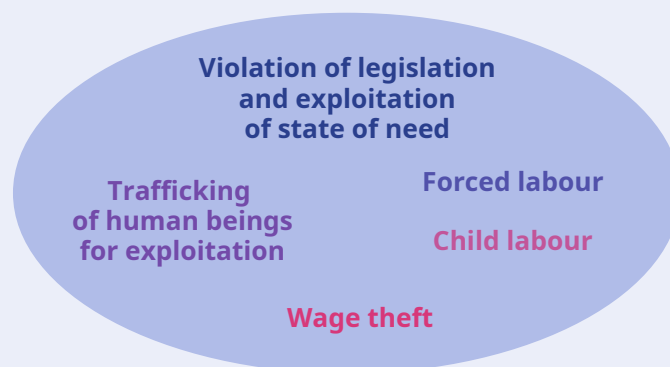
Labour exploitation is a broad term that encompasses all forms of violations of workers' human rights (from trafficking to child labour to wage 'theft'), which manifests itself more frequently in specific economic sectors and occupations and mainly involves workers in vulnerable situations. Labour exploitation is the antithesis of 'decent work' (Figure 1).

What is labour exploitation?

Figure 1: Global approach to exploitation

ECONOMIC SECTORS

EMPLOYMENT AND OCCUPATION



WORKERS IN A MORE VULNERABLE SITUATION

Increase in labour exploitation

Several factors help to explain the increase in labour exploitation, forced labour and human trafficking in recent years.² These can be grouped into two macro-categories (labour supply and demand factors) and four sub-groups:

1. **legal and institutional framework:** impunity of perpetrators, poor workplace monitoring, migration regimes that prevent regular employment of migrants.
2. **personal situation of the workers and their context of origin:** extreme poverty in the country of origin, low level of education, discrimination in the country of destination, communication difficulties in the language of the host country.
3. **workplace factors:** employment in sectors/occupations particularly exposed to labour exploitation, work in isolation situations.
4. **behaviour of employers:** reduction of production costs, absence of labour contracts, no information on rights, the dependence of workers on the employer for food, housing, and transport.³

Supply

Demand

International labour standards

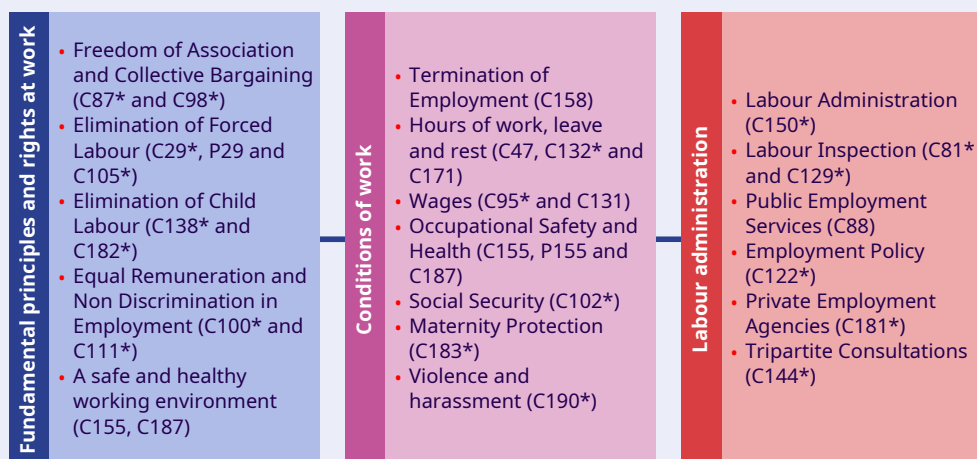
The ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998, commits all Member States to respect, promote and implement four categories of fundamental rights, regardless of whether they have ratified the relevant Conventions. In addition to these core standards, there is a body of law of over 400 international labour standards (many ratified by Italy) protecting workers against exploitation. The notion of unacceptable work and labour exploitation thus encompasses all those conditions that deny individuals the effective exercise of fundamental labour rights, which endanger workers' life, health, freedom, human dignity, and safety.⁴ Figure 2 maps international standards that guarantee decent work and the protection of all workers against labour exploitation.

² ILO: *Strengthening action to end forced labour, Report (IV)1*, International Labour Conference, 103rd session, 2014.

³ European Union Agency for Fundamental Rights (FRA): *Severe labour exploitation: Workers moving within or into the European Union. States' obligations and victims' rights* (FRA, Vienna, 2015).

⁴ Judy Fudge and Deirdre McCann, *Unacceptable forms of work: A global and comparative study*, ILO, 2015.

Figure 2: International labour standards to protect workers against exploitation



Note: * Conventions ratified by Italy.

The first box on the left refers to fundamental workers' rights (freedom of association and collective bargaining, eradication of all forms of forced labour and child labour, equal remuneration, and elimination of all forms of discrimination), without which there can be no decent work.

The second box in the centre lists international standards on working conditions, the violation of which may signal an unacceptable working situation. These standards offer minimum standards of protection of wages, working hours, social protection, health and safety, maternity protection, and job security and apply to all workers.

The last box on the right completes the map. It lists international standards to ensure labour market efficiency and vigilance against exploitation (tripartite consultations, public employment services, regulation of the activities of private employment agencies and labour inspection). Finally, several international labour standards protect specific categories of workers (e.g., migrant, and domestic workers) most at risk of exploitation (see Box 2).

Box 2: International standards for the protection of specific categories of workers

Several ILO standards explicitly prohibit labour exploitation and protect specific categories of workers, including:

- **Migrant workers:** The 1975 Migrant Workers Convention (Supplementary Provisions), 1975 (No. 143) identifies measures to address illegal immigration and establishes a general obligation to respect the rights of all migrant workers. It also extends the scope of application of the principles of equal treatment between legally resident migrants and national workers beyond the provisions of Migration for Employment Convention (Revised), 1949 (No. 97) to ensure equality of opportunity and treatment in respect of employment and occupation, social security, trade union and cultural rights and individual and collective freedoms for persons who, as migrant workers or members of their families, are lawfully present in the territory of a member state.
- **Indigenous and tribal peoples:** The Indigenous and Tribal Peoples Convention, 1989 (No. 169) prohibits the imposition of forced personal services and requires Member States to ensure that indigenous and tribal peoples are not subjected to forced recruitment systems.
- **Domestic workers:** The Domestic Workers Convention, 2011 (No. 189), requires measures to respect, promote and realise the fundamental principles and rights at work of domestic workers, including the elimination of all forms of forced labour.

Source: ILO, *Strengthening action to end forced labour, Report (IV)1*, International Labour Conference 103rd Session, 2014; ILO, *The rules of the game: An introduction to the standards-related work of the International Labour Organization*, (2019).

Framework

To shed light on unacceptable forms of work, the ILO proposed in 2015 a multidimensional and dynamic model comprising twelve dimensions, each characterised by a set of indicators helpful in identifying the phenomenon and formulating policies to tackle it (Box 3).

This model is based on the body of over 400 ILO international labour standards (many ratified by Italy) and the notion that unacceptable forms of work and labour exploitation are the opposite of the concept of decent work, a condition to which all workers aspire. The definition of unacceptable work and labour exploitation thus encompasses all those conditions that deny individuals the effective exercise of fundamental labour rights, which endanger workers' life, health, freedom, human dignity, and safety.⁵

Indicators

Some indicators are based on fundamental principles and labour rights that all nations should pursue. In contrast, others should be contextualised to national circumstances. The distinction between indicators related to fundamental principles and supplementary indicators assists decision-makers in implementing interventions to combat unacceptable forms of work, depending on the economic, institutional, and legal context of reference. For advanced countries, the reference should be the complete set of indicators.

⁵ Judy Fudge e Deirdre McCann, *Unacceptable forms of work: A global and comparative study*, ILO, 2015

Table 1: Dimensions and indicators of unacceptable forms of work

Dimension 1: Forced labour	• Forced labour, including slavery, debt bondage, human trafficking, forced prostitution
Dimension 2: Safety and health	• Risks (physical and mental) to workers' health and well-being
Dimension 3: Remuneration	• Inadequate remuneration (too low to meet basic needs) • Insecure remuneration (wage arrears, irregular payments, unjustified deductions, unpaid work, unlawful or excessive recruitment fees)
Dimension 4: Job security	• Day labour (casual contracts, zero-hour contracts). • Precarious work (discontinuous employment, possible termination without a valid reason or procedural protections). • No prospect of career promotion • No opportunities for skills development or training
Dimension 5: Hours of work	• Excessive weekly hours of work • Weekly rest of fewer than 24 hours • Insufficient daily rest • Forced overtime • Limited hours (insufficient hours worked to meet basic needs) • Unprotected night work (no health and safety assessment of the worker, no transferability, no extra compensation) • Paid annual leave of less than three working weeks • Unpredictable schedules • Lack of influence on working time (including flexibility to fulfil family and community obligations)
Dimension 6: Representation	• Failure to respect the right to freedom of association, organisation and collective bargaining • Lack of consultation or denial of worker participation
Dimension 7: Child labour	• Child labour
Dimension 8: Social protection	• Social protection is inadequate to cover basic needs (health care, insurance cover against illness, accidents and unemployment, pension cover)
Dimension 9: Equality, human rights and dignity	• Employment discrimination (including access to education and vocational training) • Unequal pay for work of equal value • Abuse, violence, and harassment • Failure to respect human rights, including privacy (e.g., restrictions on the transfer of earnings, violation of privacy in employer-provided accommodation, confiscation of property) • Lack of respect for national, ethnic, and social identities and cultures

Continued...

... continued

Dimensione 10:
Legal protection

- Exclusion from legal protection
- Non-implementation of legal protections (ineffective inspections, non-allocation of responsibility in multi-party relationships)
- Inadequate regulation of labour supply/demand intermediation of private agencies and intermediaries
- Lack of information on legal rights
- No express contract.

Dimensione 11:
Family and community

- No entitlement to paid maternity leave (minimum 24 weeks)
- No maternity protection
- No parental leave
- Work inhibits the family and community sphere

Dimensione 12:
Work organisation

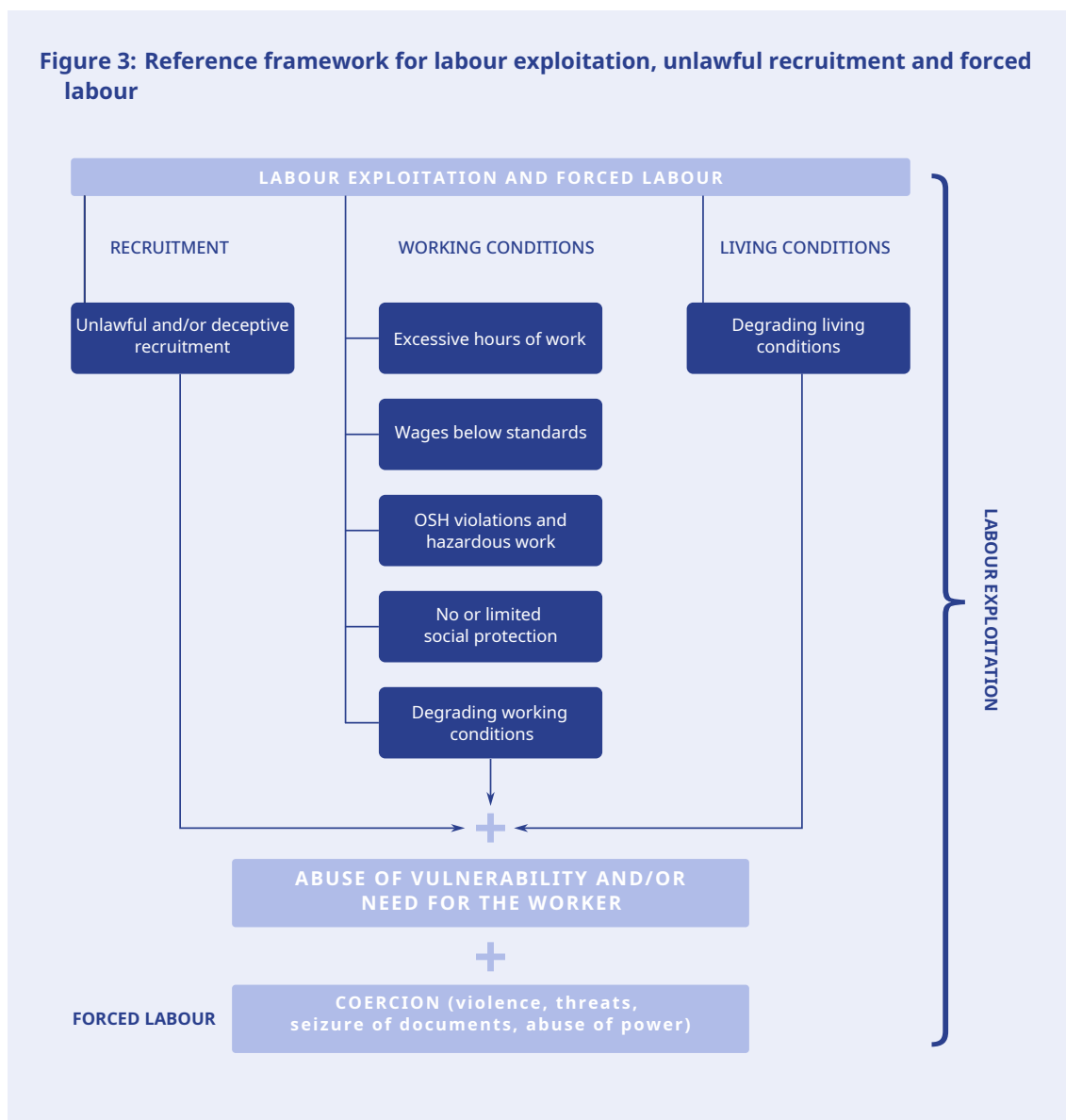
- o control over the production process
- Excessive workloads

Source: Judy Fudge and Deirdre McCann, *Unacceptable forms of work: A global and comparative study*, (ILO, 2015): 49–51.

Labour exploitation and forced labour

For operational purposes, the ILO and the European Commission developed a set of indicators of trafficking for labour exploitation based on the analysis of an international group of experts (Delphi Group). Although this list of indicators is not derived from binding international instruments, it has been used as a reference by many countries for the development, implementation, and monitoring of national policies. Figure 3 illustrates the conditions under which labour exploitation and forced labour may occur.

Figure 3: Reference framework for labour exploitation, unlawful recruitment and forced labour



The model shows how labour exploitation encompasses three areas:

It refers to the recruitment of workers to assign to third parties under conditions of exploitation. Exploitation also occurs if the worker is deceived about the nature of the job, place and conditions of work (contract, time, rest periods, wages, identity of the employer), transport or accommodation.⁶

Unlawful and/or deceptive recruitment

This area is divided into several indicators covering wages, hours of work, health and safety and degrading working conditions. The indicators are:

Working conditions

⁶ ILO and EC: Operational indicators of trafficking of human beings, 2009.

- **Violazione della normativa sull'orario di lavoro:** violazione della normativa o accordi collettivi sugli orari di lavoro ed il mancato rispetto dei periodi di riposo (giornalieri, settimanali e ferie annuali).
- **Excessive hours of work:** this concerns the violation of regulations on hours and non-compliance with rest periods (daily and week rest and annual holidays).
- **No remuneration or remuneration lower than the minimum wage:** the withholding of wages or the payment of low wages (i.e., below the national minimum wage levels or not commensurate with the work performed) constitutes labour exploitation. It also applies to situations in which the salary is paid 'in kind' or it is substantially reduced for the payment of board and lodging.⁷
- **Occupational safety and health:** Exploitation occurs in cases of hazardous work that endanger the safety and health of the worker, including the lack of personal protective equipment.
- **Infringement of labour and social security regulations:** Labour exploitation occurs when there is no contract, or the contract is not respected, or the social security dues are not paid — abusing the vulnerability or state of need of the worker.
- **Degrading working conditions:** occurs in situations of psycho-physical and work-related stress when: (i) the worker is subjected to pressing or degrading surveillance methods (constant physical presence of the employer/fiduciary); (ii) there is no possibility of communicating among workers or with other persons; (iii) work takes place in adverse weather conditions, without adequate personal protective equipment; (iv) there are no adequate restroom facilities; and (v) transport to the place of work is carried out in unroadworthy or unsafe vehicles, which endanger the safety of workers.

Degrading living conditions

This includes the denial of freely choosing one's place to live or being forced to live in unhealthy or overcrowded conditions or in facilities that does not meet minimum standards of living (electricity, restroom facilities, running water, cleanliness).⁸

Labour exploitation exists when at least one of the above-mentioned violations occur and it is combined with the abuse of the vulnerability of the state of need of the worker. Suppose coercion (violence, threats, seizure of documents, restriction of personal freedom) is added to the abovementioned components. In that case, labour exploitation takes the extreme form of forced labour.

⁷ Ibid.

⁸ Ibid.

Labour exploitation in Italy

The regulations governing labour exploitation, illicit intermediation and forced labour originate from the ratification of the ILO Conventions on forced labour and the organisation of employment services. Regarding labour exploitation and forced labour, Article 600 of the Italian Criminal Code punishes anyone who reduces or maintains a person in a state of continuous subjection by forcing him or her, without the possibility of escape, to labour or sexual services or the performance of illegal activities involving exploitation. This rule, supplemented by other provisions concerning labour exploitation through threats, violence or other forms of coercion and trafficking of human beings for exploitation, conforms with the principles established by the ILO Conventions on Forced Labour (Convention No. 29 of 1930) and the Abolition of Forced Labour (Convention No. 105 of 1957), both ratified by Italy.

Law No. 199/2016 (Provisions to address the phenomenon of undeclared work, labour exploitation and wage adjustment in the agricultural sector) is intended to ensure greater effectiveness in tackling labour exploitation in agriculture and harmonise the various existing regulations on the subject. This law amended Article 603 bis of the Italian Criminal Code by introducing the offence of unlawful recruitment and labour exploitation. Article 603 bis of the Italian Criminal Code punish anyone who takes advantage of labour services by exploiting a worker in a state of need and anyone who engages in or uses unlawful recruitment.⁹ This provision protects the worker and his freedom under the principles relating to the organisation of the public employment service provided by ILO Convention No. 88 of 1948 and Convention No. 181 of 1997 on private employment agencies.

In the Italian legal system, the reformulation of Article 603 bis of the Criminal Code by Law No. 199/2016 has provided for two different offences: (i) unlawful recruitment, which refers to anyone who recruits workers on behalf of a third party in conditions of exploitation; and (ii) labour exploitation, which refers to anyone who uses, hires or employs workers, including through unlawful recruitment, for exploitation purposes. Both offences require the abuse of the state of need of workers.

⁹ The new wording of Article 603 bis of the Criminal Code introduced in 2011 stipulates that anyone who recruits labour by assigning them to work for third parties in exploitative conditions, taking advantage of the workers' state of need, shall be punished by imprisonment of one to six years and a fine of EUR 500 to EUR 1,000 for each worker recruited. The same punishment applies to anyone who uses, hires or employs labour, including through the activity of an intermediary, subjecting workers to exploitative conditions and taking advantage of their state of need. Using threats or violence increases the prison sentence and the fine (EUR 2,000 for each worker recruited). Article 603 bis also provides that in the event of conviction for the offences set forth in Article 603 bis, it is always mandatory to confiscate the things that served or were destined to commit the offence and the things that are the price, product, or profit thereof, unless they belong to a person extraneous to the offence.

Labour exploitation indicators

The labour exploitation indicators set forth Article 603 bis encompass: (i) repeated violation of the rules related to hours of work, rest and leave periods; (ii) remuneration lower than the minimum levels set by collective agreements or not proportionate to the work carried out; (iii) violations of occupational health and safety rules; and (iv) subjecting the worker to degrading working conditions, surveillance methods or housing conditions.¹⁰ Compared to the international framework, the Italian legislation does not include as indicator of labour exploitation violations of labour law and social security regulations.

Table 2: The four indicators of labour exploitation in Italy

Remuneration	The first indicator is the 'repeated payment of wages in a manner manifestly different from the national or local collective agreements...'. The concept of repetition implies the habitual of the offence and, therefore, a set of conducts that goes beyond the first repetition and coincides with that required to offend the protected legal asset. Remuneration deviating from the contractual minimums for more than one month integrates the exploitation offence. It must also be ascertained whether the non-payment of wages to the worker is such as to affect his or her sphere of freedom and dignity, thus integrating the case of exploitation that the rule intends to strike.
Hours of work	The second exploitation indicator also includes repeated violations of the regulations regarding hours of work, rest periods, weekly rest, compulsory leave, and holidays. In this case, the violations must be characterised, in negative terms, by their seriousness, such that they affect the worker's fundamental personal rights, unfairly restricting them.
Safety and health	Mere violations of a formal nature, sanctioned administratively, are not relevant to the offence and are not suitable for proving the criminal liability of the employer. Instead, one must look at those violations that harm the worker as a person, undermining his or her right to health. Investigators tend to consider the latter indicator to exist when victims are forced to work in environments that have not been made safe or without the equipment required to perform specific tasks; and when labour intermediaries (so-called 'gangmaster') provide transport in precarious conditions.
Degrading working conditions	The fourth and last indicator of labour exploitation refers to the subjection of the worker to degrading working conditions, surveillance methods or housing situations. The concept of degradation is provided for in the Constitutional Charter (Articles 1, 2, 3, 4), which protects the worker and his inalienable rights. A violation of this indicator occurs whenever a treatment is detrimental to human dignity.

Source: Judy Fudge and Deirdre McCann, *Unacceptable forms of work: A global and comparative study*, (ILO, 2015): 49–51.

¹⁰ Concerning the violation of occupational health and safety regulations, the National Labour Inspectorate's guidelines emphasise that "the indicator will be all the more significant, the more serious the violations of a preventive nature ascertained, while any violations of a formal nature or other violations that do not directly affect the health and safety of the worker or seriously endanger it will have less 'weight'." National Labour Inspectorate: *Illegal intermediation and labour exploitation guidelines — supervisory activities* (Circular No. 5/2019).

The other element of labour exploitation is taking advantage of workers state of need. The jurisprudence of legitimacy (Court of Cassation, Criminal Section, Judgement No. 46128 of 13 November 2008) has held that a person is in a state of need in the hypothesis of a lack of existential alternatives in which an illegal immigrant without resources and who is burdened by the debt contracted with his exploiter for the facilitation of his unlawful entry into Italian territory. According to some authors, the notions of exploitation and state of need should be understood in close correlation with each other, constituting the vulnerability of the person in a state of need as the prerequisite for the agent's exploitative conduct through which the exploitation is carried out.

State of need

The number of ongoing investigations by the Public Prosecutor's Office and cases brought to trial for violations of Article 603 bis of the Criminal Code is increasing yearly. The Court of Cassation has repeatedly expressed its opinion on the offences of unlawful recruitment and exploitation, and particularly on the exploitation indicators and the irregularity of the residence of foreign workers (Box 3).

Box 3: Observations of the Court of Cassation on the offences referred to in Article 603 bis of the Criminal Code

The Supreme Court has observed in no less than three judgments (no. 49781/2019; 11546/2020, and 27582/2020) that the mere condition of administrative irregularity of the non-EU citizen in the national territory, accompanied by a situation of hardship and need for access to work, is not sufficient to trigger the crime of unlawful recruitment (gangmaster system), characterised instead by the exploitation and subjection of the worker, made manifest by contractual remuneration or regulatory profiles of the employment relationship, or by violation of the rules on safety and hygiene at work, or by subjection to humiliating or degrading working and housing conditions.

The Court counted among the factual elements demonstrating the exploitation of the workers by the corporal and, therefore, by the employer who made use of them, not only the hourly duration of the service (eight hours compared to the 6.30 hours provided for by law), the remuneration (30 euros per day) and the distressing personal and housing situation of the non-EU workers (living in an informal tent city), but also the 'compulsory' deduction of a not insignificant part of the remuneration as compensation for the corporal's car accompaniment, the lack of safety equipment, the prior failure to conduct training courses and the lack of a weekly rest day.

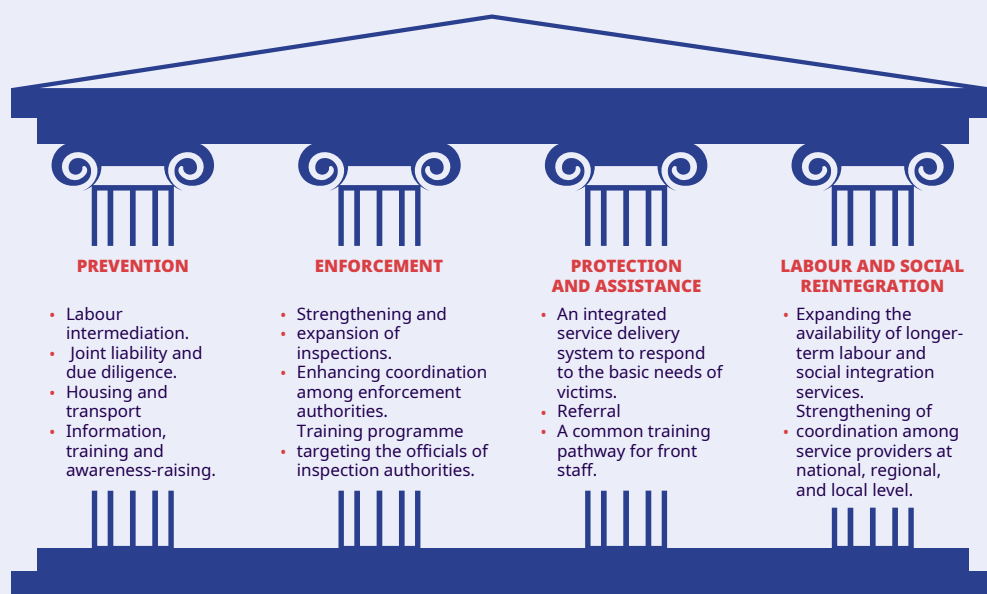
Source: Court of Cassation, [Judgements](#).

Strategies

International labour standards and European Directives agree in identifying four areas of intervention that national strategies to combat labour exploitation must include being effective: prevention, protection and assistance, remedies, and law enforcement. These four areas of intervention can be visualised graphically as the supporting columns of a building, each of which is necessary for the structure to be solid (Figure 4).

Each policy area has several specific policies and instruments to confront the various risk factors of labour exploitation, both on the demand and supply side.

Figure 4: Areas of intervention to combat labour exploitation



Prevention

Prevention strategies aim to address the causes and risk factors associated with labour exploitation and forced labour. Without effective prevention, investment in other areas (e.g., identification and protection of victims, law enforcement) cannot completely solve the problem, as new victims may replace previous ones. Prevention, therefore, must be an integral part of any strategy to tackle labour exploitation, forced labour and related practices.

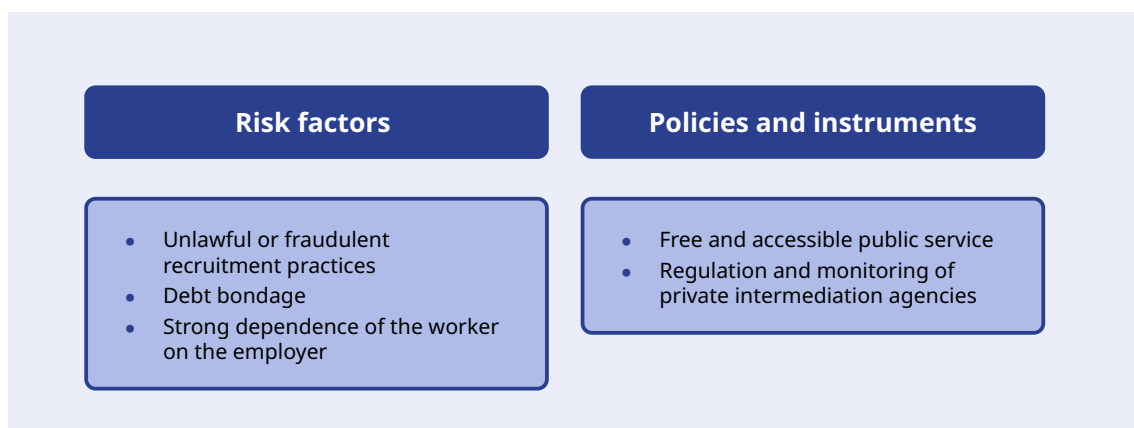
Labour intermediation

Increasingly, the recruitment of workers, especially migrant workers, is carried out through private recruitment agencies. Globally, there are more than 250,000 private recruitment agencies. Private intermediation can play an important role in matching labour supply

with demand, thus improving the functioning of the labour market. In some cases, mainly when there are loopholes in laws and their enforcement, this type of intermediation can lead to exploitation and abuse of workers.

Among the abuses are the payment of intermediation fees, which drive workers into debt bondage, misleading information about the nature and conditions of work, theft of personal documents, illegal wage withholding and threats of losing one's job or being expelled from the country.

A recent ILO study indicated that only a few countries have a comprehensive regulatory framework for labour intermediation.¹¹ While most national regulations prohibit charging recruitment fees and related costs, there are governance gaps for both domestic and cross-border recruitment, enforcement and sanctions, and coverage of the entire recruitment chain, including labour intermediaries and subcontractors.



On the demand side, the functioning of supply chains and work organisations, including contractual arrangements (e.g., outsourcing and subcontracting), can exacerbate the risk of labour exploitation. In agriculture, for example, globalisation has led to new forms of product marketing — characterised by rapid perishability — with large trading companies buying products on national and local markets. The different bargaining power between producer and seller often leads to intense competition and low-profit margins for small producers. Another example is the work organisation in the construction sector, which uses different contractual arrangements involving large, small, and tiny companies to implement the same project. The imbalance in bargaining power between the main contractor (usually a large company) and the subcontractors, including small companies and, in some cases, self-employed workers, can cause labour costs to be squeezed and lead to the exploitation of workers.

Supply chains and labour organization

¹¹ ILO, *Ending forced labour by 2030: A review of policies and programmes*, 2018.

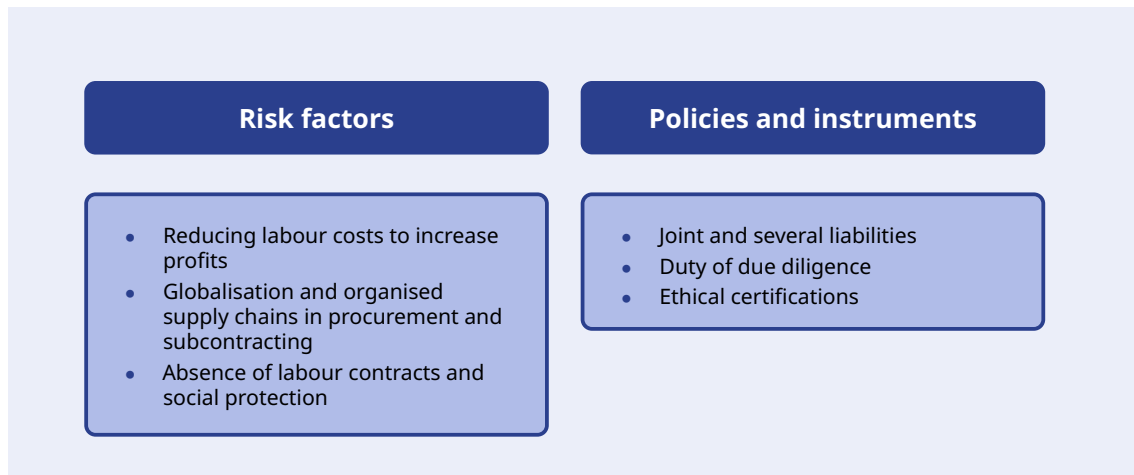
Joint and several liabilities of all enterprises in a supply chain for the respect of workers' rights is a regulatory strategy to improve working conditions and tackle labour exploitation. The application of the principle of joint and several liabilities to all companies that are part of a supply chain (e.g., the food supply chain) means that the companies at the top of the chain, i.e., those with bargaining power, influence their suppliers to apply labour and social security rules fully. In general, joint and several liability regimes apply to contracts where employers, contractors, and sub-contractors are jointly and severally liable for violating labour standards and for fraudulent or illegal hiring.

Due diligence systems require companies to demonstrate that they are adopting all necessary measures to identify, prevent and mitigate labour exploitation and forced labour internally and in the supply chain. These standards increase the likelihood that supply chain companies will refrain from resorting to exploitative practices and maintain their image with customers. At the same time, they discourage potential contractors from resorting to such practices. Some EU countries (Belgium, France, the Netherlands, UK) have enacted specific laws defining companies' duty of due diligence concerning human rights. The European Commission is developing a Directive on corporate due diligence that will likely apply to medium-sized and large companies (based on several employees and turnover); it will make it mandatory to assess risks and act against violations perpetrated by companies in the supply chain. It will provide for financial and possibly even criminal sanctions for company executives.

Voluntary certification systems usually see individual companies or a group of leading companies in a sector adopt codes of conduct, apply ethical certification, or implement forms of social auditing.

Industry-wide initiatives differ from voluntary schemes implemented at the company level in several respects. Firstly, standards apply to several players in the same industry, with the aim of including the entire supply chain. Secondly, standards cover different certification areas (social, environmental, economic). Finally, standard setting is more inclusive and involves the consultation and participation of all stakeholders in the supply chain.

Social labelling systems function as voluntary verification of companies' social (or environmental) performance. These systems use a physical label to describe the company's efforts to improve the social conditions underpinning a product or service. The initiatives avail of independent certification bodies that, once they have assessed the company's entire performance, grant the use of the label.



Other strategies that could be useful for preventing labour exploitation in agriculture concern housing for seasonal workers and access to a suitable transport network. Labour exploiters often offer workers in need a package of services that includes accommodation, transport to and from work, and insurance of working days. These two areas and the intermediation between labour supply and demand represent the three cornerstones on which the oppressive power of labour exploiters is based.

Housing and transports

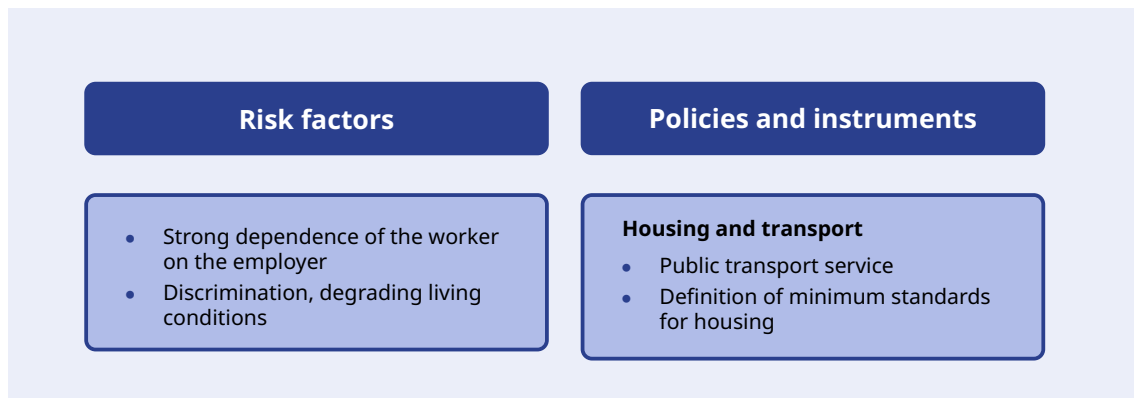
The issue of temporary housing and guesthouses is also a crucial aspect of agricultural work in other countries. In California (USA), in agricultural districts, there are two types of worker housing programmes: (i) centres for seasonal workers, owned and managed by local authorities; and (iv) state-subsidised public housing projects. Local authorities own the public housing centres for agricultural workers. The centres lodge unaccompanied seasonal workers and close during the low season. However, the centres' closures are staggered so that at least one of the centres is also open in the low season. Local authorities also use social housing programmes to meet the needs of agricultural workers throughout the year. Since 1993, the Social Housing Fund has provided financial support for affordable housing development, including housing for migrant farm workers.¹²

Also, the Agricultural and Seasonal Workers Protection Act (MSPA, 1983) sets employment standards for wages, housing, and transportation in the United States. The legislation requires employers who house agricultural workers to ensure that the accommodation complies with federal and state safety and health standards (including water supply; sanitation; laundry, hand hygiene and bathing facilities; electric lighting; waste disposal; cooking facilities; security and first aid facilities). Housing for migrant workers cannot be occupied until it has been inspected and certified.¹³

¹² See: [Final Report: 2012 Napa County Farmworker Housing Needs Assessment](#), 2013.

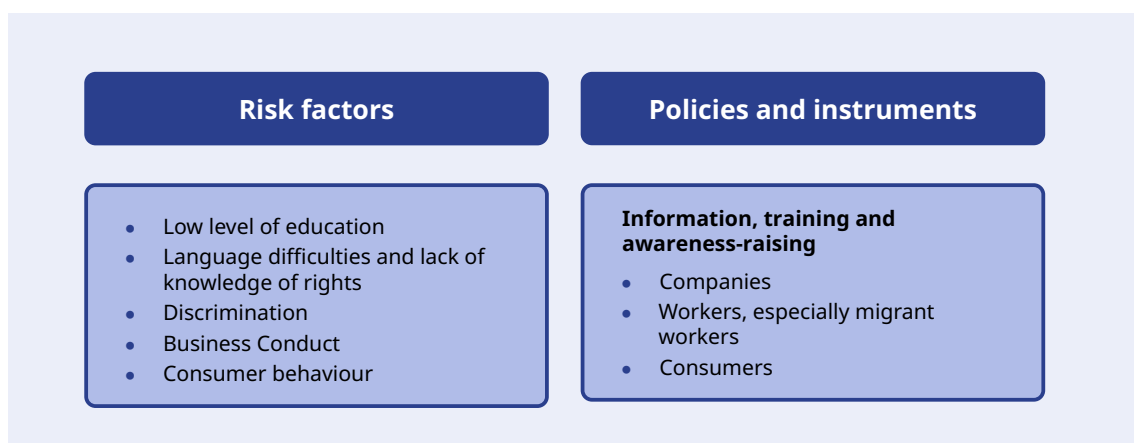
¹³ See: [Migrant and Seasonal Agricultural Worker Protection Act, Wage and Hour Division](#), U.S. Department of Labor.

There are stringent quality standards for mobile housing for seasonal workers in the UK. These standards concern the square footage, ventilation, and safety of the accommodation (fire, first aid), the supply of drinking water, laundry services, and recreational areas. The same legislation also regulates access to transport services. If the employer provides these, they must have a special licence and meet safety requirements (maximum number of passengers, ventilation, regular mechanical checks, driver skills).¹⁴



Awareness-raising

Awareness-raising initiatives are commonly part of prevention strategies. Most are implemented through campaigns targeting companies, workers, and the general public. At the national level, awareness-raising efforts use a broad spectrum of traditional and non-traditional communication channels (e.g., radio and TV spots, documentaries, theatre productions, conference and film discussions, social media, video testimonies of victims and printed information in different languages). Many campaigns focus on human trafficking and forced labour, while those on labour exploitation are less common. Border crossings and airports are key points where migrants can be reached with information, and many countries have developed leaflets and similar materials to distribute to travelling workers.



¹⁴ Ibid.

Protection and assistance

Victim protection and assistance are the pillars of policies and measures put in place at the national level to ensure that victims of labour exploitation and forced labour can rebuild their lives rather than remain trapped in a spiral of labour abuse. Although these measures are primarily aimed at protecting victims, they can also prevent re-victimisation.

The protection of victims of labour exploitation and forced labour has multiple dimensions. It starts with identifying and identifying workers in situations of exploitation and forced labour and includes immediate assistance measures and medium- to long-term social and labour reintegration services.

The process of identification of potential victims is central to protection and assistance strategies regarding labour exploitation.¹⁵ The main actors involved in the identification process vary from country to country depending on whether there is a national referral mechanism. Generally, formal identification is the responsibility of public authorities involved in surveillance and law enforcement (e.g., police, labour inspectorate, immigration and border services, the judiciary and health and social services). The identification process is carried out by personnel trained to gather evidence on trafficking for exploitative purposes (interviews with the potential victim, fact-finding and witness statements and interventions implemented within protection systems).

In Austria, for instance, where there is no national referral mechanism, the formal identification of victims is carried out by the police and its investigative units located in the federal provinces.¹⁶ In Spain, the system for protecting victims of trafficking in human beings establishes the obligation for the supervisory and law enforcement authorities (police, labour and social security inspectorate, immigration, and border control services) to report any suspected case to the Public Prosecutor's Office. The identification of the victim is based on three elements: (i) assessment of exploitation indicators, (ii) interview with the person concerned and (iii) information/witness testimony from third parties.¹⁷

The formal identification process may also involve civil society organisations in countries with a national referral mechanism. In these cases, identification may be carried out during the awareness-raising activities carried out by the organisations that are part of the referral system or through toll-free numbers and telephone services to collect to assist victims. In the United Kingdom, for example, preliminary identification (initial screening) is carried out by the

¹⁵ Article 10 of the Council of Europe Convention on Action against Trafficking in Human Beings requires state parties to take measures to identify victims of trafficking. To this end, states must provide the competent authorities with trained and qualified personnel in preventing and combating trafficking and in identifying and assisting victims.

¹⁶ Group of Experts on Trafficking in Human Beings (GRETA): Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Austria. Second evaluation round, Strasbourg 2015.

¹⁷ GRETA: Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Spain. Second evaluation round, Strasbourg 2018.

staff of first response organisations (i.e., the staff of the organisations that are part of the national referral mechanism) based on pre-established indicators of modern slavery.¹⁸ Formal identification is carried out by the competent national authority (the Home Office for third-country nationals and the Human Trafficking Centre for UK, EU, and EEA nationals), to which first responders refer potential victims.¹⁹

The assistance services offered to victims of labour exploitation are similar between countries. The services provided include room and board, primary and specialised healthcare, legal assistance, psychological support, material, and financial support (cash benefits) and voluntary repatriation services. Long-term social and labour inclusion measures specifically targeting victims of exploitation are less common, as countries rely on existing services and programmes targeting groups at risk of social exclusion.²⁰

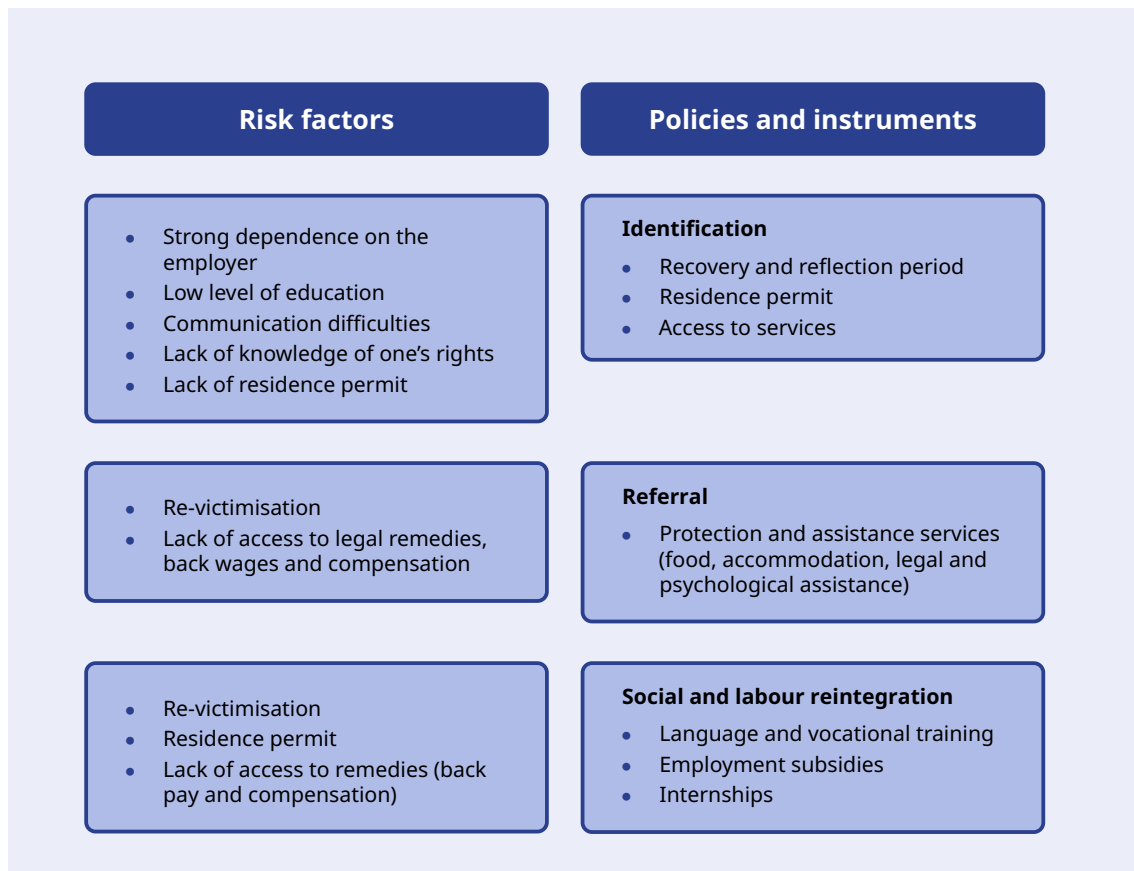
In all EU countries except Austria, Bulgaria, Ireland and Italy, victims are granted a recovery and reflection period (30 to 90 days from the date of identification) to allow for an initial recovery, plan their future, and decide whether to cooperate in the investigation.²¹ The first assistance services provided to a victim during the recovery period are defined through the preliminary assessment of individual needs immediately after identification. The needs assessment is carried out upon reception in countries with a national referral mechanism. This preliminary assessment is subsequently reviewed during the recovery period — and once the formal identification process is over — to assist the victim in transitioning to long-term social and labour inclusion services.

¹⁸ The UK referral mechanism has eighteen first responder organisations, including some government agencies (Home Office, local authorities, police, health and social care, Labour Exploitation and Corporal Labour Authority, National Crime Agency) and other non-governmental organisations (Poppy Project, Trafficking Awareness Raising Alliance, Migrant Help, Kalayaan, Medaille Trust, Salvation Army, Barnardo's, National Society for the Prevention of Cruelty to Children, Unseen UK, New Pathways, BAWSO and Refugee Council). See Home Office: Victims of modern slavery — Competent Authority guidance, London, 2016.

¹⁹ After the initial referral by a considered first-intervention worker, a determination is made within five days that there are 'reasonable grounds' to conclude that the person is or may become a victim of modern slavery. It is followed within 45 days by a 'final decision', which initiates victim support measures. See UK Home Office: Victims of modern slavery — Competent Authority guidance, London, 2016.

²⁰ Long-term labour reintegration services for victims are reviewed in ILO, *Protection and assistance of victims of labour exploitation. A comparative analysis*, Rome, 2020.

²¹ For more information on the terminology, see [Chamber of Deputies, Trafficking in Human Beings: Legal Framework](#), 17th Legislature.



In order to remedy situations of labour exploitation and forced labour, it is necessary for victims to have access to justice (procedural rights such as access to information and legal assistance, the issuance of residence permits) and to obtain compensation (substantive rights such as financial compensation for damages suffered, for unpaid wages, as well as for physical and moral or other damages).

Victims of labour exploitation can access justice and obtain compensation in several ways. Among these, the main ones are (i) criminal proceedings; (ii) civil proceedings, including in labour courts, for physical and moral damages and payment of wage arrears; and (iii) labour inspectorate and other administrative proceedings for compensation related to the violation of labour rights, as well as for orders for payment of unpaid wages.

Although the right to compensation is enshrined in the legislation of EU countries, the number of victims of labour exploitation who can access any form of compensation is generally low. It is due to several factors, including (i) the low number of convictions and confiscation orders, due to the difficulty in collecting evidence; (ii) the limited access to free legal assistance and third-party representation in handling investigations and claims on behalf of victims; (iii) the prolonged duration and complexity of civil proceedings; and (iv) the requirements established by national compensation schemes to respond to claims (claim period, cooperation with the authori-

Access to remedies

ties, access conditional on the conclusion of criminal proceedings). For victims of labour exploitation, uncertainty about the timing and outcome of proceedings (and fear of deportation for irregular migrant workers) is a deterrent to accessing justice and other forms of compensation.

In addition to the difficulties just described the need to support themselves and their families often leads many victims of labour exploitation to prefer payment of back wages over other forms of legal recourse. Irregular migrant workers must also obtain a residence permit and a formal job. For these reasons, a more innovative approach to labour exploitation beyond trafficking and forced labour should focus on the compensation of 'wage theft', allowing exploited workers to benefit from their labour.²² Preventing and tackling such abuses is not a matter of secondary importance. On the contrary, it would improve the conditions of the so-called 'majority of exploited workers' who suffer common exploitation and violation of their labour rights. It would also reduce the probability of more severe forms of exploitation and strengthen confidence in reporting violations.

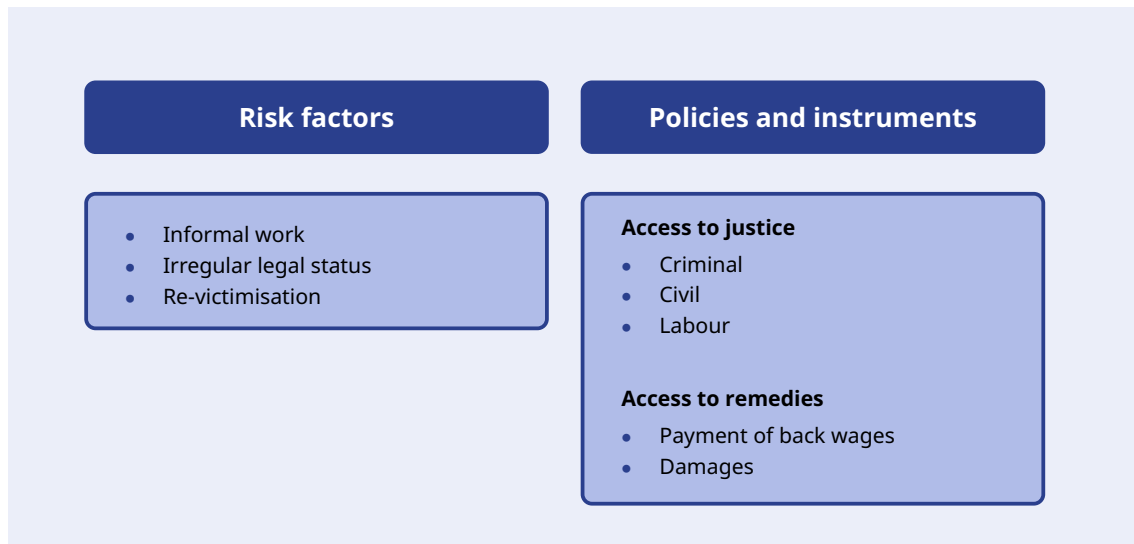
Although the legislation of EU countries generally recognises the right to receive payment of unpaid or only partially paid wages, taxes and social security contributions, less than a quarter of EU Member States recognise the right of irregular migrant workers to claim payment of wage arrears, including through simplified procedures that do not provide for complaints by these workers or that allow third parties (e.g., supervisory authorities, employers' organisations, trade unions and migrant workers' organisations) to make such claims.

Three European states (Belgium, France, and Greece) have established specific mechanisms to allow workers to receive their due, even after returning to their countries of origin. In France, for example, the Immigration and Integration Office can issue executive orders to receive back payments on behalf of migrant workers and, if they have returned to their countries, instruct French consulates to reimburse the beneficiaries in their home countries.

In Czech Republic, France, Germany, Malta, Portugal, Romania and Spain, any worker can claim compensation from the state for unpaid or partially paid wages. In Portugal, for example, Article 336 of the labour code provides for workers to claim payment of wage arrears from the wage guarantee fund in case of insolvency or other severe economic reasons of the employer. In Italy, only victims of labour exploitation who have been trafficked can claim compensation from the state fund for victims of trafficking when compensation cannot be obtained from the offender or when the offender is unknown. Article 6 of Legislative Decree 24 of 2014 on the right to compensation for victims of trafficking establishes a lump sum of Euro 1,500

²² Focus on Labour Exploitation (FLEX), [Guide to legal remedies for victims of trafficking for labour exploitation](#) (Update 2017).

granted at the victims' request. If the perpetrator is unknown, this request must be made within five years of the judgment recognising the right to compensation or one year of the cessation of the criminal proceedings.



Policies to combat new forms of labour exploitation, forced labour, and human trafficking require effective interventions to prevent the phenomenon, prosecute the crimes and protect the victims. Law enforcement is the primary tool to adequately tackle the phenomenon since the impunity of exploiters is one of the main reasons for this practice to continue.

Law enforcement

Enforcement relies on two main elements: (i) a legal framework that prohibits labour exploitation, forced labour and trafficking, and provides for a persuasive sanctioning mechanism and protection of victims; and (ii) adequate enforcement capacity that includes the legal mandate of enforcement agencies, resources, and ongoing training of enforcement officers.

Legislative provisions are only sufficient if accompanied by adequate enforcement capacity. The complexity of enforcement against labour exploitation is mainly due to: (i) the difficulties inherent in identifying situations of labour exploitation; (ii) the complexity of gathering solid evidence and securing victims' testimony; (iii) the lack of cooperation between supervisory and law enforcement agencies with different mandates and operational procedures; (iv) the limited use of appropriate technological tools and investigative techniques; and (v) the lack of investment in training of magistrates, police officers and inspection staff on exploitation indicators and victim protection and assistance systems.

Many European countries have developed exploitation, forced labour and trafficking guidelines and indicators to facilitate the identification of potential victims by both supervisory bodies and other actors on the ground and activate protection and assistance services.

In some European countries (Belgium, Finland, and the Netherlands), the supervisory bodies — especially the police and labour inspectors — have set up specific task forces or investigation units to investigate cases of labour exploitation. The employees of these units have specific training on collecting evidence, interviewing suspects, interviewing victims and the protection and assistance system. Training the supervisory bodies' employees is essential for correctly applying labour exploitation indicators, collecting witnesses and other evidence for judicial activities, and fostering cooperation between supervisory bodies with different mandates and procedures.

Case studies

Below are some of the cases investigated for the offence of unlawful recruitment and exploitation of workers, as well as the decisions of the Italian courts and the grounds for the sentences concerning the exploitation indicators.²³

Digital platforms, food delivery (2020)²⁴

With decree No. 9 of 28.05.2020, the Court of Milan put under commission the digital platform UBER EATS, which, by taking advantage of the needy situation of riders (formally employees of two other intermediation agencies in the logistics sector), subjected them to conditions of exploitation and subjection, so much to constitute the crime of gangmaster under Article 603 bis of the Italian Criminal Code.

Taking advantage of the state of need

The Court of Milan affirmed that, in this case, the exploitation of the workers' state of need — a necessary element for integrating the offence of gangmaster — can be recognised, first and foremost, in their nationality. In fact, in most cases, they were asylum seekers from Nigeria, Mali, Ivory Coast and Gambia, hosted in reception centres, with limited-time residence permits for humanitarian reasons. According to the judges, these conditions led the recruited riders to accept conditions of exploitation and discrimination to have the money they needed to survive.

Hours of work

The workers had shifts of 13 consecutive hours between 11 am and midnight.

Remuneration

The pay was EUR 3 per hour, from which sums were deducted in case of failure to achieve an order acceptance rate of more than 95 per cent. The workers waived the tips that customers credited directly to the app, which were unduly deducted by the digital platform. They were forced to return EUR 80 in case of breakage or loss of the bag in which they carried the food.

Degrading working conditions

Workers received messages from their contacts containing threats, including physical threats, if they did not comply with the directives received.

²³ Sedd ADIR, [L'altro diritto: Laboratorio sullo sfruttamento lavorativo](#). Centro di ricerca interuniversitario su carcere, devianza, marginalità e governo delle migrazioni.

²⁴ Tribunal of Milan, [Decree No. 9/2020](#).

Textile sector (2017)

The investigation started with a complaint from six Bengali workers to a third-sector organisation. Subsequently, it was discovered that labour exploitation affected numerous Bengali workers, and, therefore, further complaints were filed during the investigation, reaching the 16 offended parties. For all the offended parties, following the complaint and having shown cooperation in the criminal proceedings, as well as the presence of concrete elements of exploitation, the Public Prosecutor expressed a favourable opinion on the issuance of a residence permit for social protection, Article 18 of Legislative Decree No. 286/98 (for the first five offended parties) and humanitarian reasons, Article 22 paragraph 12 quarter of Legislative Decree No. 286/98 (for the remaining ten offended parties).

The trial, which ended with a conviction (between 5 and 8 years of imprisonment), recognised the criminal liability of the defendants for all the crimes they were charged with, i.e., illegal recruiting and labour exploitation (Article 603 bis of the Criminal Code); criminal association (Article 416 of the Criminal Code) with the aggravating circumstance of transnational crime; and aiding and abetting illegal immigration (Article 12 of Legislative Decree No. 286/98 its amendments and additions).

Deceptive intermediation

The workers were recruited in Bangladesh by their compatriot who, taking advantage of his reputation as a textile entrepreneur, offered them a regular and well-paid job (including accommodation) in Italy. For this intermediary activity, the workers had to pay sums varying between 10,000/12,000 Euro, obtain travel documents and the promise of a residence permit.

Hours of work

Once in Italy, the young workers were placed in their 'recruiter' factories and or family members. The workers were forced to work 7.30 am to 9.30 pm from Monday to Saturday, 8 am to 5 pm on Sundays.

Remuneration

The salary given to the workers was variable, from 120 to 300 euros per month.

Taking advantage of the state of need

The workers were subjected to acts of intimidation, harassment, violence, and insults; faced with the situation just described, the Court in Naples considered that the state of need was proven by the writings (*per tabulas*), limiting itself to stating that in the absence of fragility, the victims would hardly have agreed to work under the conditions imposed.

Degrading living conditions

The workers were locked inside barracks owned by the defendants, who also embezzled EUR 80 for the rent of the apartment dormitories.

Labour exploitation in fruit picking (2018)

The 'Momo' investigation dates back to July 2018 and involves an intermediary from Burkina Faso who procured seasonal workers, partially regularised, for two owners of various farms in the Saluzzese (province of Cuneo) area. The investigation involved around 19 workers.

Hours of work

The seasonal workers, mostly of African nationality, had short and constantly renewed contracts, were called at all hours of the day and night, and often stayed in the fields picking fruit for up to 10/12 consecutive hours, even though they worked less than half that amount each day. Trained and equipped with cards, in the event of a check, they would have to say that they had been working for a few months and report false working hours.

Remuneration

The workers were receiving about EUR 5 per hour, EUR 2.5 less than required by law.

Degrading living conditions

Workers were housed in up to 40 rooms, for which part of their pay was withheld, in precarious hygienic conditions and without heating (to be paid separately).

Safety and health

Workers were often employed in activities they were not trained for, such as using forklifts or carts; again, they were exposed to pesticides without any protection. If they protested, they were threatened with losing their jobs.

Labour exploitation in vegetable harvesting (2019)

The facts concern 400 foreign workers, mainly African and Romanian, recruited by a fictitious cooperative that supplied cheap labour to hundreds of companies in Latina, Rome, Frosinone and Viterbo provinces. The African workers were recruited in great reception centres, where they were waiting for recognition of international protection.

The Romanian victims, mainly women, were recruited by fellow countrymen directly in Romania, choosing them from among particularly vulnerable people and offering them the possibility of working in agriculture, in Italy, for a different number of hours and remuneration than agreed. Once in Italy, the victims were employed to work in the fields. The investigation led to the arrest of six Italians, with another 50 suspects, including agricultural entrepreneurs, accountants, and officials. Among those arrested were two women responsible for recruiting the labour force. The police seized dozens of vehicles, property, and houses worth around 4 million euros, profits illegally made at the expense of foreign workers.

Hours of work

Hours of work were 10-12 continuous hours.

Remuneration

The remuneration was about 4 Euro per hour.

Degrading working conditions

The workers were subjected to constant surveillance, threats and violence. The workers were crammed into the Cooperative's vans in numbers twice the capacity of the vehicles and transported from place to place for collection.



Module B2

**The Three-year Plan to tackle
labour exploitation and
unlawful recruitment
in agriculture**

The Three-year Plan to tackle labour exploitation and unlawful recruitment in agriculture

Learning objectives	By the end of the session, participants will have: • Acquired information on the development and approval of the Three-Year Plan to tackle labour exploitation and unlawful recruitment in agriculture (2020-2022). • Reviewed the strategic pillars of the Plan, the ten Priority Actions and the governance system. • Discussed implementation and monitoring tools.
Time required	Two hours
Teaching resources	• Interactive discussion: Plan priorities and relevance to national policies and regional initiatives • Interactive discussion: Areas for improvement in prevention and law enforcement interventions.
Read more	• Three-year Plan to tackle labour exploitation and unlawful recruitment in agriculture 2020–2022; • Report to Parliament on the first year of implementation of the Three-Year Plan to tackle labour exploitation and unlawful recruitment in agriculture (2020–2022) • Three-year Plan Roadmap • Monitoring matrix of the Three-year Plan.

Introduction

This training module is divided into three sections. The first section traces the stages of the development and approval of the Three-year Plan. The second section offers an overview of the strategic pillars, the ten Priority Actions and the Plan's governance system. The last section outlines the tools for implementation and performance monitoring.

The Three-year Plan

The development of a national strategy to tackle labour exploitation is provided for in Law No. 199/2016 provisions to address the phenomenon of undeclared work, labour exploitation and wage adjustment in the agricultural sector). The law aims to ensure greater effectiveness in tackling labour exploitation by introducing significant changes to the criminal law framework and providing specific support measures for seasonal workers in agriculture. The law, however, does not provide measures to protect and assist victims of exploitation. The main features of the measure concern:

1. The redefinition of the offence of gangmaster (unlawful recruiting and exploitation of labour), which introduces the punishment of the employer and the legal persons involved in the offence.
2. Judicial measures (mitigating circumstances; arrest in flagrante delicto; confiscation; precautionary measures relating to the farm where the offence is committed).
3. The protection of victims by extending the benefits of the Anti-Trafficking Fund to victims of labour exploitation.
4. Protection of workers through the improvement of the Quality Agricultural Labour Network and the gradual adjustment of wages in the agricultural sector.

To enforce Law No. 199/2016, in 2018, the "Inter-institutional Committee for the definition of a new strategy to tackle gangmaster and labour exploitation in agriculture" was established at the Ministry of Labour and Social Policies. The Committee promotes a shared strategy to tackle exploitation in agriculture. It meets about three times a year and is the body responsible for coordination at the national level, policymaking, planning institutional activities and monitoring the implementation of interventions.¹

The Committee involves representatives from the Ministry of Labour and Social Policies (with the Technical Secretariat entrusted to the Directorate General for Immigration and Integration Policies), the Ministry of the Interior, the Ministry of Justice, the Ministry of Agricultural, Food and Forestry Policies, the Ministry of Infrastructure and Transport the National Agency for Active labour Market Policies (ANPAL), the National Labour Inspectorate, the National Social Security Institute (INPS), the Carabinieri Labour Protection Command, the Guardia di Finanza, the Regions and Autonomous Provinces of Trento and Bolzano and the National Association of Italian Municipalities

¹ The Committee was established by Decree-Law No. 119/2018, as amended by [Law No. 136/2018](#) on urgent tax and financial measures.

(ANCI). Participation in the work is also open to social partners and third-sector organisations. In 2020, the membership of the Committee was also extended to include those responsible for territorial cohesion and equal opportunities policies.

Considering the complexity of the phenomena to be addressed, the Committee is supported by eight Working Groups focused on eight priority topics:²

1. Supervision and law enforcement, coordinated by the National Labour Inspectorate (INL).
2. Agro-food production chain, coordinated by the Ministry of Agricultural, Food and Forestry Policies.
3. Quality Agricultural Labour Network, coordinated by the National Social Security Institute (INPS).
4. Labour flows — coordinated by the Ministry of Labour and Social Policy — and intermediation between labour supply and demand, coordinated by the National Agency for Active Labour Policies (ANPAL).
5. Transport, coordinated by the regions.
6. Temporary accommodation and guest houses, coordinated by the National Association of Italian Municipalities (ANCI).
7. Information System, coordinated by the Directorate General for Information Systems, Technological Innovation, Data Monitoring and Communication (MLPS).
8. Protection, assistance, and socio-occupational inclusion of victims, a group coordinated by the Directorate General for Immigration and Integration Policies (MLPS).

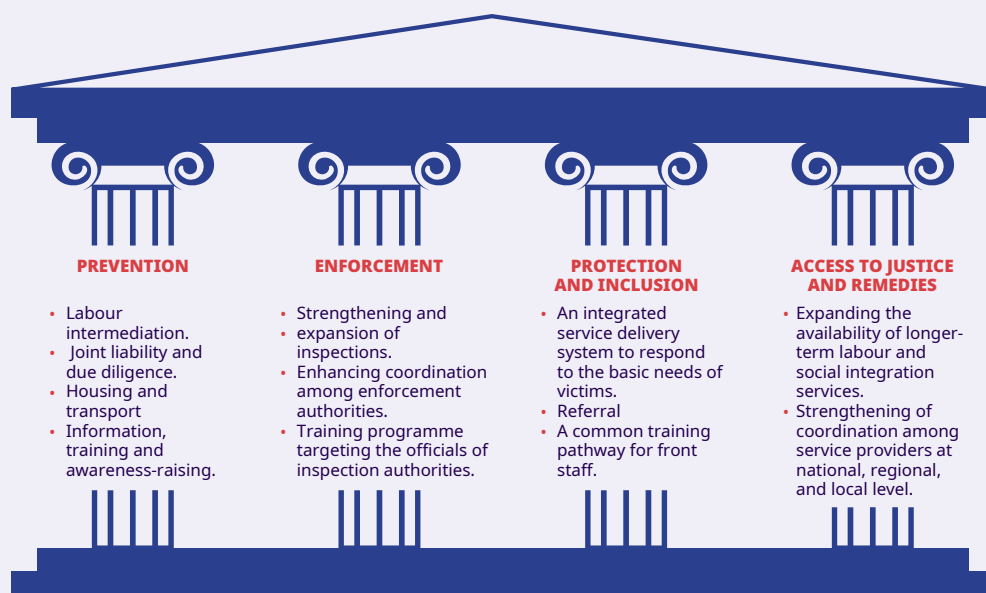
After about 18 months of work, the first three-year Plan to tackle labour exploitation was approved by the Committee (February 2020), with an agreement reached by the Unified Conference of the Regions in May 2020.

The Plan is based on several lines of intervention and a strategy articulated in three phases: an initial phase of analysis of the phenomenon, emergency interventions in the most critical areas and a systemic action covering the entire national territory. The latter is structured on four priority pillars concerning: (i) prevention, (ii) enforcement, (iii) protection and assistance to victims, and (iv) labour and social reintegration. For each strategic pillar, the Plan identifies priority actions involving the different administrations at the central, regional, and local levels within a multi-level governance model.

Strategy, priorities, and governance

² Initially, there were six groups; in 2019, Information System, Victim Protection, Assistance and Reintegration were added.

Figure 1: Areas of intervention to tackle labour exploitation



To favour its implementation, the Plan provides support to local administrations for the development of multi-action programmes to prevent and tackle labour exploitation in agriculture and the development of tools for knowledge, exchange of experiences and dissemination of good practices.³ Training actions for operators and support in the experimentation of pilot actions accompany these tools.

Governance model

The Three-year Plan adopts a multi-level governance model shared among the institutions that, because of the administrative decentralisation and the articulation of functions among the various subjects of the Public Administration, are competent for implementing the planned interventions. All this is supported by enhanced collaboration between public institutions, social partners, and third-sector organisations.

At the national level, the Committee is responsible for guiding and planning institutional activities; monitoring the implementation of interventions; coordinating and sharing priority actions; drafting legislative proposals on labour exploitation and sharing good practices.

- The thematic working groups are entrusted with monitoring of the implementation of the priority actions of the Three-year Plan within the remit of their respective institutions.

³ See [La promozione del lavoro dignitoso in agricoltura: Analisi delle pratiche promettenti in Italia](#), Roma, 2021.

- The Unified conference is bridging role the planning guidelines outlined in the Plan and regional planning.
- The regions adopt the Committee's guidelines through regional programming and planning for the implementation of the Plan's initiatives that fall within their competence areas.
- Local authorities and their associative forms are entitled to prepare multi-sectoral plans to implement the interventions.
- Prefectures ensure coordination at local level between all the main stakeholders and cooperate with the territorial sections of the Quality agricultural labour network.

The Three-year Plan consists of ten priority actions, each one addresses the challenges identified in preventing and tackling labour exploitation.

One of the factors limiting the implementation and monitoring of effective policies is the need for more reliable statistical data on labour exploitation in Italy, its geographical concentration, the categories of workers most at risk, and the flows between regions of seasonal workers following the crop cycle. There is also a need for more data and information sharing between administrations.

This Action aims to collect, process and make available to all Plan partners the data and information necessary for the formulation, implementation, and monitoring of interventions. Specifically, the Action includes preparing a crop calendar, analysing agricultural labour needs, mapping national-scale production, communication routes and transport services, and collecting other valuable information for coordinating the priority actions outlined in the four strategic axes. The mapping of the national territory aims to identify areas at risk (low, medium, and high) of labour exploitation in agriculture to prioritise interventions for prevention, contrast, protection and assistance, and socio-labour inclusion. The main results of the information system action include the following:

- Mapping of intervention areas, sector needs and the calendar of crops for intervention planning and resource identification.
- An information system for the collection and analysis of data and information gathered by the various administrations involved in the implementation of the Plan.
- The collection, systematisation, and analysis of statistical data on agricultural labour and labour exploitation.
- Sample surveys on informal work and exploitation.

The work carried out under this Action includes (i) the development of a shared methodological approach; (ii) an inventory of data sources, mapping available data on workers and enterprises; and (iii) a series of data sheets describing more than 60 indicators, how to collect and use data within an integrated system.⁴

⁴ See ILO, [*Sistema informativo sulla qualità e quantità di lavoro in agricoltura: Sintesi analisi statistiche e elementi principali del sistema informativo*](#), Rome 2021.

Priority actions

Agricultural and food supply chain

The second Action of the Plan acts on the demand side and aims to address the structural problems of the agricultural market, i.e., lack of investment; limited technological progress; unfair product marketing practices that squeeze producers' wages and workers' salaries; and the low uptake of joint responsibility and ethical certification systems. The results to be achieved include the following:

- The completion of the regulatory framework on unfair trading practices in the agricultural and food supply chain. Strengthening and expanding incentives on supply chain contracts for investment, technological innovation, corporate social responsibility and producer aggregation.
- The access of agricultural enterprises to investments under the innovation credit and other measures in the National enterprise 4.0 plan.
- Guidelines to allocate investment in vocational training for workers.

Concerning the completion of the regulatory framework, the European Directive 633/2019 on unfair commercial practices in the marketing of agricultural products (with a ban on double-bottom auctions and the sale of products below cost) was transposed in Italy. The resources available for supply chain contracts have risen from 500 million Euro in 2019 to 1,203 billion Euro in 2022 (with the contribution of resources from the National Recovery and Resilience Plan), with priority given to technological investments and the participation of businesses in quality schemes. Of the total funds made available in 2021 by the National Enterprise 4.0 Plan (around 37 billion Euro), 5 billion Euro have been allocated to enterprises in the agricultural sector.

The Network of quality work in agricultural and its territorial sections are crucial in activating measures to prevent and combat labour exploitation. The number of member enterprises of the Network in 2019 was relatively small and unevenly distributed across the country concerning the importance of agricultural activity. The main challenges to increasing the number of adherent enterprises concerned: the expansion of the Network's functions and activities, the distribution of territorial Sections, the development of incentives to adhesion, the lack of knowledge of the Network's role, the limited adhesion of enterprises to ethical certification and solidarity responsibility systems. Action 3, therefore, includes the following results:

- The revision of the regulatory framework of Network of Quality Work in Agricultural (types of eligible enterprises, widening the scope to enterprises providing services in the field of agricultural labour; access requirements; territorial organisation; operational tools and resources).
- The increase in the number of enterprises joining the Network of Quality Work in Agricultural and the development of an incentive system for member enterprises.
- The geographical spread and expansion of the functions and activities of the territorial sections.

- An accessible online and more user-friendly system for consulting the companies registered in the Network.
- The dissemination of joint responsibility practices in agri-food supply chains.
- The participation of farms in ethical certification schemes based on compliance criteria.
- Increased awareness of the Network's role in promoting agricultural products and decent work in the sector.

Between 2019 and 2020, there was an increase in the number of farm businesses joining the quality agricultural labour network (around 30 per cent). Experiments on fairness indicators are also underway at the regional level (e.g., Lazio).⁵

To tackle the use of illicit intermediation and labour exploitation, the main challenges relate to the limited presence of regular channels able to effectively connect workers with businesses; the limited attractiveness of Employment Centres (CPI) for both workers in the sector and businesses; the lack of a common intermediation model throughout the country; the limited availability of dedicated services for workers and employers in the agricultural sector; and the difficulty of CPI to adapt quickly to the needs of the agricultural labour market. The main results for the implementation of this action are based on:

- Planning of agricultural workers' needs, including the definition of quotas for the legal entry of foreign workers.
- An analysis, with input from the social partners, of the types of employment contracts in the sector and their correspondence to the needs of agricultural work.
- Improvement of service efficiency and effectiveness for workers and employers in the agricultural sector through the activation of a platform for matching labour supply and demand; the definition of essential levels of performance (LEP); the simplification of administrative procedures for the recruitment of agricultural workers, and the continuous training of operators.
- Provision of fixed and mobile counters specialising in agricultural labour intermediation and other services for workers and employers (reservation lists, training and job placement assistance) in cooperation with the members of the territorial sections of the Network of Quality Work in Agricultural, bilateral bodies, training institutions and other organisations.
- Cooperation between the Employment Centres and private bodies accredited to provide employment services.
- Control and monitoring of agricultural labour intermediation.

⁵ [Regional Law No. 18 of 2019](#) provides for the definition, in consultation with the social partners, of the relationship between (i) the quantity and quality of goods and services offered by employers and the quantity of hours worked and (ii) the percentage deviation from the index to be considered normal, taking into account the possible presence of process automation tools in the company.

In the implementation phase, this Priority Action was divided into two sub-actions, one related to labour flows and the review of contractual forms available in the sector (also with reference to practices in other European countries for recruiting workers during harvests), and the other related to labour intermediation.

The first sub-action included the 2021 labour relations emersion programme. Out of more than 176,000 applications received, 16.7 per cent concerned the legalisation of employment in agriculture. As regards the flows decree, the quotas for seasonal work in the agricultural and tourism-hotel sectors increased from 18 thousand entries in 2019 to 42 thousand in 2021.

In the area of labour demand/supply intermediation, ANPAL's provision of a digital application (Restoincampo 2.0), and research on accredited private intermediation agencies⁶ should be noted.

Housing

The development of informal settlements creates a fertile ground for the infiltration of criminal groups in labour management, making the conditions of the workers living there even more vulnerable. Compared to the extent of the phenomenon, housing managed by public institutions and third-sector organisations plays a residual role. Workers often refuse accommodation in organised centres, both because of the former's proximity to their workplaces and the costs to be borne.

This Action, therefore, aims to eliminate spontaneous or informal settlements offering housing solutions that allow for decent living conditions. Key outcomes include:

- The definition of essential levels of housing services for the design, management and delivery of services at the local level.
- The promotion — in consultation with local authorities and employers' and sectoral associations — of long-term housing solutions for agricultural workers.
- The implementation of emergency housing interventions and company guest houses as an alternative to spontaneous settlements in the areas most at risk of labour exploitation.
- The improvement of the quantity and quality of housing services provided by local administrations to agricultural workers.

As part of this priority action, ANCI mapped the housing conditions of agri-food workers in 2021. The work helped to guide the allocation of some EUR 200 million under the NRP to overcome housing deprivation and marginalisation.

Transport

The issue of the transport of workers from their places of residence to their workplace is one of the critical levers in the fight against labour exploitation in agriculture, which is also based on the illicit control of the mobility system of agricultural workers (today, the 'gangmaster' is more a transporter than a labour intermediary). This forces workers to have to pay for transport to and from their place of work. The most significant challenges to be faced are updating

⁶ The Piedmont and Lazio regions have also launched applications to facilitate the matching of labour supply and demand in agriculture.

regional transport plans and providing services that consider the needs of agricultural workers, the places where they live, and the seasonal peaks imposed by harvesting agricultural products. Key deliverables for the implementation of the action include:

- Guidelines and memorandum of understanding for the design and implementation of integrated regional transport plans for agricultural workers.
- Creation of regional registers for private transport companies interested in providing services (DRT and non-DRT shuttles).
- Promotion by bilateral bodies of transport services for seasonal agricultural workers.
- Improving the quantity and quality of dedicated transport services, including through the implementation of rural development programmes.

Consumers need tools to trace the products they buy. Many male and female workers, especially citizens of countries outside the European Union, need access to information on their rights, working conditions and services available from public institutions, intermediary organisations, trade unions, third-sector associations, and other actors. Agricultural enterprises that comply with regulations on the quality and origin of agricultural products and labour and social legislation often face unfair competition from those who do not comply. This Action, therefore, includes among its primary outcomes:

- The development and implementation of an institutional and social communication campaign at national level to prevent and tackle labour exploitation and campaigns at territorial level.
- Dissemination of information to consumers, workers and businesses on ethical and sustainable products and the role of the Network of Quality Work in Agricultural in combating labour exploitation.
- The production and dissemination, in cooperation with institutions and social partners, of information and training material on labour exploitation and the promotion of decent work.
- A cooperation protocol between ANPAL and private agencies with guidelines for the implementation of fair recruitment principles.

This priority action aims to increase farm inspections in areas identified as having a high risk of labour exploitation. The main challenges relate to the identification of priority geographical areas on which to focus inspection activities; the conduct of labour exploitation investigations; the coordination between the various agencies responsible for surveillance activities; the collection and analysis of information managed by the multiple administrations; and the availability of appropriate resources to carry out surveillance and law enforcement activities. Outcomes include:

- Planning and implementation of surveillance and law enforcement activities on the basis of territorial mapping and the agricultural crop calendar.

Communication and awareness raising

Enforcement

- Strengthening INL's inspection services, including human and technical resources.
- More effective coordination between the different inspection bodies (establishment of joint task forces at territorial level and support from agriculture specialists).
- Improving the supervisory system through the use of information and tools from the various administrations.
- Increase in the number of agricultural enterprises and workers inspected
- Development of guidelines and implementation of training programmes for inspection authorities on labour exploitation, unlawful recruiting, forced labour and the referral mechanism for protection and first assistance of victims.
- Development of training modules on identifying and combating labour exploitation for use by law enforcement authorities, including action to be taken in cases of violence and harassment in the world of work, including gender-based violence.

Within this Priority Action, the recruitment of new labour inspectors, the establishment of joint task forces to combat exploitation, which led to the identification of approximately 2,500 victims of labour exploitation between 2020 and 2021 (INL, Comando Carabinieri Tutela del Lavoro and Guardia di Finanza) should be noted.

Protection and assistance

This Priority Action aims to respond to the State's obligation to promote, respect and realise human rights and to fill the gaps in Law No. 199/2016 on labour exploitation in agriculture.

The provision and range of protection and assistance services to victims of exploitation require the intervention of a multiplicity of institutional and non-institutional actors operating in different specialised fields (e.g., health protection, social and legal services). Moreover, there are numerous protection and assistance services often provided based on the victims' status (victims of trafficking, sexual exploitation, labour exploitation, unaccompanied minors, victims of violence and harassment at work) rather than on the identification of pathways based on individual needs. Specific regulatory provisions, moreover, reinforce this diversity of treatment. Priorities for action in this area concern implementing a system of integrated protection and assistance services for victims of labour exploitation, including identification of victims, referral, provision of first assistance services regarding their basic needs, and linking them with medium- and long-term inclusion pathways. The primary outcomes of this action include:

- The creation of guidelines on the referral system for the operators of the entities responsible for the programming and implementation of labour and social policy interventions.
- The realisation of socio-occupational pathways integrated with reference services and protection and assistance mechanisms.

- The harmonisation and strengthening of forms of protection for foreigners who are victims of trafficking and labour exploitation to promote their social reintegration through access to decent work.

In October 2021, the Unified Conference sanctioned the agreement to adopt the 'National guidelines on the Identification, Protection, and Assistance of Victims of Labour Exploitation in Agriculture',⁷ which provide for the implementation of a national referral mechanism on the identification, protection, and initial assistance to victims of labour exploitation in agriculture; the identification of common operational procedures and measures; the indication of the subjects and actors involved; and the protection of foreign citizens who are victims of labour exploitation and who lack a residence permit.

The main obstacle to effective long-term social and labour inclusion of victims of exploitation is the fragmentation and poor coordination of the network of services provided by different actors at national, regional, and local levels. This priority action aims, therefore, to develop a national framework with pathways for the socio-occupational inclusion of victims of exploitation; to implement inclusion programmes based on guidelines formulated at the national level in consultation with regional authorities, including specific measures for the job placement of victims of exploitation; and to set up continuous training activities addressed to the relevant service providers. Key outcomes include:

- The establishment of a national system for the planning, coordination and implementation of social and labour inclusion pathways.
- The development of guidelines for the development of inclusion plans and standards for the provision of services for victims of labour exploitation.
- Development of a monitoring system for social and labour inclusion services.
- The organisation of a programme and training activities for workers in social and labour inclusion services.
- The activation of a series of experimental programmes and pilot projects to validate the national social and labour reintegration system (already underway with the resources made available by the FAMI and the MLPS Inclusion Fund).

Following the approval of the Plan, the coordinators of the thematic groups and the Technical Secretariat defined an operational matrix (Roadmap) to facilitate the implementation of the interventions. The Roadmap is a tool that identifies the main activities, results to be achieved, and initial indicators (baselines) — built based on available information, measurable targets, necessary resources, implementation period, responsible institutions, and partners. Where critical outputs were added (e.g., Action 9), and the responsibilities of the

Labour and social reintegration

Roadmap of the Plan

⁷ [Linee-guida nazionali per l'identificazione, protezione, assistenza delle vittime di sfruttamento lavorativo in agricoltura](#).

implementing partners were better articulated (e.g., Action 4, with a separation between interventions related to the regulation of labour flows and initiatives to promote the efficiency and effectiveness of labour intermediation).

The development of the Roadmap enabled the coordinators of the thematic groups to reflect on the baseline (snapshot of the current situation), detail the interventions and resources required for the realisation of the results envisaged in the Plan, the involvement of partners in the implementation of the various interventions, as well as the timeframe for implementation (Table 1).

Table 1: Roadmap of the Plan

Priority action 1:	An information system with crop harvest calendars, labour force requirements as well as other data and information developed and used for planning, managing and monitoring the agricultural labour market
Target:	Information system for the gathering and analysis of data and information
Coordination:	Ministry of Labour and Social Politics (DG-Information systems)

Main results	Indicators	Implementing unit	Financial resources	Time frame
Result 1.1 Mapping of geographical areas, of labour force needs and the development of the crop harvesting calendar to plan action and allocate resources	- Information provided by public institutions that are partners in the Plan are analysed on a regular basis for planning and monitoring relevant interventions (protection, assistance, enforcement) and appropriate human and financial resources. - A calendar of crop harvesting of geographical areas is updated on a regular basis.	MIPAAF (with AGEA, ISMEA, CREA) MLSP (DG information system) Regions CPI Social partners National Labour Inspectorate (INL) Ministry of Interior	Available: to be finalized To be identified: to be finalized	Start: 2020 End: 2020
Baseline There is no mapping based on official data and information that includes a crop calendar and an estimate of the sector's needs by geographical area	- The sector's labour needs, including flows of migrant workers, are determined periodically and fed into the mapping of areas of intervention. - The mapping includes: (i) the definition of the origin/destination matrices of agricultural workers (reception centres, settlements, workplaces); and (ii) the assessment of the transport system (existing local public transport, dedicated public transport, private collective transport)			

The object of monitoring is the Three-year Plan — understood as a structured set of interventions (Priority Actions) which, against given financial resources, contribute to achieving a specific expected result.

The monitoring matrix defines, for each primary outcome of the Priority Actions in the Three-year Plan, the result and implementation indicators (where available) to be used to verify the progress of interventions and the achievement of the Action's purpose.

The matrix includes the definition of the indicator, its initial value (baseline), and the value to be achieved (target) within the timeframe of the plan; the method of measurement and breakdown of the required information; the periodicity of data collection and the sources; and finally, the actors who are responsible for collecting and aggregating the monitoring information (Table 2).

Monitoring matrix

Table 2: Example of a monitoring matrix

Action 5: Planning and implementation of decent housing opportunities for agricultural workers as an alternative to informal settlements and degrading accommodation

Obiettivo da raggiungere

Main outcome	Indicator	Definition and measurement	Baselines, targets, and sources	Unit in charge and frequency of data collection
5.1. Definition of quality criteria for housing solutions for the design, management, and delivery of services at local level	70 per cent of settled agricultural workers have access to housing in line with nationally defined minimum quality standards	Number of settled agricultural workers who have access to accommodation in line with minimum quality standards out of the total number of settled workers	Baseline Information on the number of agricultural workers in degrading housing conditions not aggregated at national level Target By 2022, 70 per cent of settled agricultural workers have access to housing that meets minimum standards set at national level Source Data from the information system managed by the Information Systems DG of the MLPs	Unit in charge: National Association of Italian Municipalities (ANCI) Frequency: Annual

Defining the main result

Value of result indicator to be achieved within the period

Definition of result indicator

Type of indicator
Outcome indicator

Type of indicator (implementation or result)

Level of disaggregation of indicator data

Disaggregation

- Characteristics of workers (gender, age, nationality)
- Type of housing
- Geographical area

The source of the information needed to measure the value of the indicator

Frequency of the data collection for monitoring

For each priority Action of the Plan, a measurable goal (target) to be achieved by 2022 has been defined. The definition and measurement method of the key targets, where specified, are provided at the beginning of the matrix for each Action (Table 3).

Table 3: Key indicators of the Three-year Plan

1	Plan partner institutions using the information system
2	Value added to agricultural producers for processed food products
3	Agricultural enterprises registered in the Quality Agricultural Labour Network
4A	Italian and foreign agricultural workers employed illegally
4B	Percentage of agricultural workers using Public Employment Centres (CPI)
5	Percentage of agricultural workers with access to decent housing
6	Percentage of agricultural workers with access to dedicated transport
7	Proportion of consumers made aware of ethical products
8A	Percentage of agricultural enterprises inspected
8B	Percentage of agricultural workers protected
9A	Number of identified victims of labour exploitation in agriculture
9B	Number of victims of labour exploitation in agriculture using protection services assistance
10	Number of victims of labour exploitation in agriculture reintegrated into the labour market



Group interaction: Actions to tackle exploitation

To facilitate the interaction of participants and exchange experiences, trainers may ask participants to indicate in the Plan the Actions most relevant to their territories in order to deepen their content.

First year of implementation

In its report to Parliament on the first year of the Plan implementation, the MLPS summarises the work done, outlining strengths and areas to be prioritised in the remaining two years of implementation.

Among the **strengths** found in the launch of the various priority Actions is the joint work of the various institutional actors, the social partners, and the representatives of the third-sector associations involved in the vertical/horizontal partnership represented at the Committee and in the Working Groups. A further vital point is the creation of the Information System that will allow the sharing of the information that has emerged during this first year of work and the homogenisation and structuring of the available data. A further vital point in this area is the sharing of the methodological approach that has united the efforts of statistical offices of different bodies to identify indicators and variables and to work according to an incremental approach.

At the territorial level, the transversal nature of the multi-actor approach outlined in the Plan has reinforced the adoption of the same model in the implementation of specific policies of regional competence. Most of the Regions agree on the effectiveness of the Plan's participatory governance mechanism and have, in turn, set up Regional Coordination Committees. In the case of the Apulia Region, this has contributed to the strengthening and complementarity of the actions implemented in collaboration with the partner regions of territorial proximity. In Basilicata, co-planning, and multi-actor involvement (especially with bodies and organisations in the health sector) were crucial to implement COVID-19 prevention actions in settlements with high social marginality. Similarly, in Veneto and Tuscany, the design of actions in collaboration with social and employer partners has enabled the definition of targeted services to support local businesses and workers within the framework of legality and transparency of practices to be adopted and rights to be guaranteed.

Among the priorities identified for the effective implementation of the Three-Year Plan is strengthening the Quality Agricultural Labour Network, also through a regulatory revision. It is necessary to implement measures to increase the membership of agricultural enterprises in the Network. To this end, an overall revision of the registration procedure and requirements would be helpful, to which should be added the provision of measures of a rewarding nature to be also included in the Rural Development Programmes (RDP), as has happened, for example, in the Emilia-Romagna Region.

As far as housing policies are concerned, the approval by the national Committee of the document containing the mapping of informal settlements on which to intervene with rehabilitation measures would be entirely consistent with the indications contained in the PNRR for the development of decent housing solutions for workers in the agricultural sector with a view to social cohesion and inclusion.

Regarding the agri-food supply chain, implementing Directive (EU) 2019/633 of the Parliament and of the Council concerning unfair business-to-business commercial practices in the agricultural and food supply chain is a decisive step. However, it is also necessary to ensure the full implementation of the law by strengthening supervision of compliance with the prohibitions on double-bottom auctions or sales of agricultural products below cost. The new regulation will also have to be implemented through the involvement and awareness-raising of large retailers by encouraging the adoption of economic-commercial protocols inspired by business ethics and through initiatives to support ethical supply chains. It is also essential to guarantee the process of technological innovation and the use of investments to improve the sustainability and quality of agricultural products to ensure greater price stability, a fairer distribution of value and decent and safe working conditions.

The health emergency of 2020 certainly slowed down the action of public services, highlighting the structural criticalities of specific sectors. The limitations imposed by the COVID-19 containment measures have resulted in the non-activation of the competition procedures that should have guaranteed the necessary strengthening of the inspection staff underlying the objectives defined for the INL. About supervision, it is also essential to make a qualified and significant investment in the interoperability of the various institutions' databases, common inspection strategies and controls, and more advanced technological tools.

At the regulatory level, similar paths of protection for foreign victims of labour exploitation would be desirable through the harmonisation of treatment in cases of trafficking and severe exploitation (Article 18 of the Immigration Consolidation Act — social and judicial path) and foreign victims of labour exploitation (Article 22 of the Immigration Consolidation Act — judicial way).

At the territorial level, there is another aspect that deserves proper attention: while participatory governance and the multi-actor strategy were effective in defining the Plan's strategic objectives and the measures to be adopted, readjustment is required in the operational phase through the specific identification of the functions of the various institutional levels to avoid overlapping competences.

Finally, integrating sources and data is another area identified as needing improvement. The main critical issue is the sharing of datasets to be integrated for implementing the Information System on quantity and quality of work in agriculture.



Module B3

Introduction to monitoring and evaluation

Introduction to monitoring and evaluation

Learning objectives	By the end of the session, participants will have: • Deepened the basic principles of monitoring and evaluation. • Examined the building blocks of a performance monitoring system (initial, implementation and outcome indicators; targets; and data sources).
Time required	One hour and 30 minutes
Teaching resources	• Interactive discussion.
Read more:	• <i>Linee guida per il monitoraggio delle Azioni prioritarie del Piano triennale di contrasto allo sfruttamento lavorativo in agricoltura e al caporalato</i>, (ILO, Rome 2021).

Introduction

This module introduces the monitoring and evaluation methodologies and the principles guiding their implementation.

To effectively implement policies to prevent and tackle labour exploitation in agriculture, it is crucial to develop a monitoring system that can continuously measure, according to objective criteria, the outcomes of the planned and implemented interventions. The monitoring system makes it possible to:

1. Obtain valuable and timely information on the initiatives' impact.
2. Take corrective action, if necessary, to reorient initiatives to enable the achievement of expected outcomes.
3. Guide future choices.

Definition

Monitoring and evaluation are processes that make it possible to observe the evolution of an intervention over time (monitoring), measure its effectiveness and correspondence between the expected outcomes and the outcomes obtained (performance evaluation), and determine whether the observed changes are determined by the intervention implemented or by other factors (impact evaluation).

Monitoring

It is a continuous process of information collection and analysis on the interventions' implementation (e.g., resources used, beneficiaries reached, and the situation at the end of the intervention). It permits comparing the outcomes obtained with those expected and appreciating and assessing the possible differences (e.g., between the final beneficiaries, type of intervention, and geographical areas).

Evaluation

It is a process that verifies — systematically and according to objective criteria — all the elements of an intervention (e.g., planning, implementation and outcomes achieved) to determine its overall value. The evaluation provides evidence-based information to identify how increasingly better results can be achieved.

There are two main types of evaluation:

- **Performance evaluation** focuses on the quality of implementation and the outcomes achieved by an intervention in the short to medium term (e.g., the number of victims of labour exploitation reintegrated into employment). Although this type of evaluation is carried out based on information collected by the monitoring system, the scope is broader. It assesses whether the observed changes are due to the interventions or other factors.
- **Impact evaluation** focuses on the difference between what has been achieved through the implementation of the intervention and what could have been achieved in the hypothetical situation ("counterfactual") if the intervention had not been implemented. This type of evaluation aims to distinguish the changes produced by the intervention from those that have occurred over a certain period in the target group or geographical area.

Monitoring and evaluation should also include information on the financial resources invested. This information makes it possible to estimate the benefits of interventions concerning their costs and identify which implemented interventions have the highest return rate. For this purpose, two approaches can be used:

- **The cost-benefit analysis** estimates the total benefits of an intervention concerning its costs. This type of analysis is typically used ex-ante to decide between different intervention options. The main difficulty with this approach lies in estimating the monetary value of “intangible” benefits. For example, suppose the main aim of a social and labour inclusion intervention is to increase employment opportunities for victims of labour exploitation. In that case, these are considered tangible benefits to which a monetary value can be attributed. However, having a job and a decent wage also increases victims’ self-esteem and self-determination, factors that are difficult to express in monetary terms as they take on different values depending on the individual.
- **The cost-effectiveness analysis** compares the costs of two or more interventions to achieve the same result. For example, establishing a toll-free number for victims of labour exploitation and inspection and surveillance activities on farms aim to identify potential victims of labour exploitation. The toll-free number identifies potential victims for EUR 10,000 per victim. At the same time, the inspection has an estimated cost of EUR 6,000 per victim. Inspections are, therefore, more cost-effective than toll-free number contacts.

The performance management (or outcomes-based management) is a strategy to change how organisations work. Performance measurement (performance monitoring) concerns the production of information. It focuses on goal setting, development indicators, and performance data collection and analysis. Outcomes-based management systems usually comprise the steps outlined in Table 1.

Cost-benefit analysis

Performance management

Tabele 1: Performance management systems

Performance measurement

Strategic planning

1. **Objectives definition:** identify, in measurable terms, expected outcomes and develop a conceptual framework illustrating how to achieve such outcomes.
2. **Indicators identification:** define what will be measured on a scale or according to a specific dimension for each objective.
3. **Target definition:** for each indicator, define the outcome to achieve within a specific time frame; use the outcome to assess the performance.
4. **Monitoring:** developing a monitoring system that collects information on the outcomes obtained regularly.
5. **Outcomes analysis:** comparison between outcomes obtained and targets defined.
6. **Evaluation:** to collect information not made available by the monitoring system.
7. **Use of monitoring and evaluation information** for organizational learning and decision-making processes.

Indicators

Performance indicators are schematic measures, both quantitative and qualitative, which can be easily measured, and which make it possible to verify the progress of interventions at regular intervals. The formulation of the indicators determines the information to be collected and analysed.

Qualitative indicators provide information on possible changes in individuals' attitudes, beliefs, motivations, and behaviour. **Quantitative indicators** measure changes in a specific value (number, mean or median) or percentage. Although necessary, the information needed to measure qualitative indicators requires more time for collection, measurement, and analysis, especially in the early stages of implementing relevant interventions.

It is important to emphasise that the success of a monitoring and evaluation system is measured not so much by the amount of data and information generated but rather in terms of the use made of the information made available. In this regard, one of the monitoring critical principles is that performance indicators must be SMART, namely:

- S** **Specific** (defined and focused on the type of outcome to monitor);
- M** **Measurable** (allowing the collection of information to be assigned a numerical value);
- A** **Achievable** (usable, affordable and at an acceptable cost);

R **Relevant** (inherent to the result and capable of measuring changes over time); and

T **Time-bound** (referring to a time limit or deadline).

Monitoring systems usually include four types of indicators.

Initial, or baseline, indicators report the reference indicator's value before the intervention's implementation. They are determined either based on secondary data sources (already available) or may require primary data collection.

In the **Piedmont Region**, for example, Regional Law No. 12 of 2016 allows farms (as an exception to a previous general rule on areas used for agricultural activities) to adapt structures used for different purposes — even those registered as non-residential — for the hospitality of seasonal workers and the use of prefabricated buildings, if there are no premises adaptable for residential use, provided that they comply with the health and hygiene rules and regulations of the municipalities where the intervention takes place. In this case, the baseline indicator is unavailable as the initiative is new compared to the past. The baseline for the indicators developed to measure the initiative's progress (e.g., adhering municipalities out of the total number of target municipalities, companies involved, seasonal workers accepted) is constructed over time (starting from the date of the law's entry into force). The monitoring system monitors the initiative's progress over time: the latest available data on the municipalities participating in the initiative, for example, show that 8 out of the 20 municipalities in the Piedmont fruit sector have applied for the regional contribution.

Another example is the initiative realized in **Apulia Region** concerning the construction of guest houses to replace the informal settlement at the Borgo Mezzanone reception centre. In this case, the baseline should be defined on the region's estimates according to which, during seasonal peaks, the number of persons residing in the informal settlement exceeds 2,000.

Implementation (or output or process) indicators — continuously measure the relationship between an intervention's inputs, activities, and outputs. Such indicators verify that the information leads to the planned activities and that the activities carried out lead to the intended outcomes.

The **Lazio Region**, for example, has implemented on an experimental basis — with regional funding — the measures provided for in the 2019 Protocol 'For quality work in agriculture'. One of the measures is opening desks dedicated to agriculture in the Employment Centres (CPI) of the province of Latina. A significant implementation indicator to monitor for this type of initiative is the progressive opening of dedicated Employment Centre desks (i.e., the number of CPI in the province of Latina with dedicated desks), starting from baseline zero (being this a new initiative).

Types of indicators

Initial (baseline) indicators

Implementation indicators

Outcome indicators

These types of indicators measure the short-term outcomes the intervention achieves by producing outputs. They are checked at specific periods (e.g., annually) to provide a snapshot of the outcomes achieved on that date. These types of indicators are the most relevant when monitoring public policy interventions. When an outcome indicator specifies the value (a number, a mean, a median or percentage) it should reach over the period, it becomes a **goal (target)**. The function of the monitoring system, therefore, is to check at regular intervals whether the progress of the intervention is on track to achieve the target.

For example, an outcome indicator for the above intervention in **Apulia** (guest houses) could concern the number of agricultural workers residing in informal settlements with access to decent housing solutions. Consider setting a target for the initiative, expressed as the percentage of farming workers resident in the informal settlement of Borgo Mezzanone who, by the end of the intervention, are accommodated in the guest houses made available by the region.

Regarding the **Piedmont** regional law example, a possible outcome indicator could be the share of seasonal workers in the fruit sector who have access to company guesthouses.

Similarly, the **Lazio Region's** initiative could be measured by a result indicator relating to the percentage of agricultural workers (or companies) using the services of the dedicated desks out of the total number of agricultural workers (or companies) in the Province of Latina (service coverage rate).

Implementation and outcome indicators also provide for the **disaggregation** of data to be collected. The most common disaggregation are individual characteristics, geographical area, and type of service rendered.

Context indicators

Context indicators are valuable statistical data to monitor the situation of the agricultural sector and its labour market. They represent an indirect tool to monitor the effects of policies to prevent and combat labour exploitation as they describe the context in which the interventions are implemented and their evolution over time. For example:

- Number of workers in the agricultural sector at the territorial level.
- Value of agricultural production.
- Percentage of Italian and foreign employees in agriculture.
- Rate of irregular workers.

Box 1: Suggestions for the development of indicators

Relevance: Indicators should be aligned with user needs and the purpose of monitoring. They should be able to indicate whether progress is being made in solving identified problems.

Disaggregation: Information should be disaggregated based on what is being measured. For example, for individuals, fundamental disaggregation concerns gender, age, level of education and other personal characteristics that are useful for understanding how the intervention is being implemented. For service delivery, disaggregation usually occurs on the type of services (e.g., pre-identification of victims, interpretation services, health care).

Ease of use: Indicators should be understandable and easy to use. Data should also be relatively easy to collect.

Clear definition: An indicator that is not clearly defined may be subject to different interpretations, and it is, therefore, necessary to include the data source for measurement. For example, the indicator 'employment rate of participants after the inclusion pathway' requires specifying (i) how the employment rate is calculated (no. of participants with a job out of total participants); (ii) definition of participant (e.g., anyone who has followed at least 60 per cent of the pathway); (iii) definition of 'after' (time lag between the end of the pathway and the measurement, e.g., two weeks, six months, one year).

Number of indicators: There are no definite rules to define an appropriate number of indicators. A common mistake is overloading (the formulation of dozens of indicators, many of which still need to be used). Information overload and overly complex aggregations (e.g., composite indices, weighting systems) should be avoided.

Costs: There is a trade-off between indicators and the cost of collecting data for their measurement. The indicator may retain relevance if data collection becomes less costly and time-consuming.

Technical soundness: Data should be reliable and timely. The user should be informed about how the indicators were constructed, the sources used, and their meaning and interpretation.

Forward-looking: A well-designed system of indicators should measure trends over time.

Adaptability: The indicators should be easily adaptable and usable in different geographical areas and circumstances.

Source: Canadian International Development Agency (CIDA): *Guide to gender-sensitive indicators*, Ottawa, 1997.



Module B4

Monitoring the performance of the Three-year Plan

Monitoring the performance of the Three-year Plan

Learning objectives	By the end of the learning module, participants will have: • Analysed the performance monitoring system of the <i>Three-year Plan</i> and the definition and measurement of result indicators. • Discussed the organisation of data collection activities for monitoring.
Time required	Two hours
Teaching resources	• Interactive session with questions and answers. • <i>Activity</i>: Data collection for the plan's key indicators.
Read more:	• Plan Monitoring Matrix. • Data collection matrix on the implementation of the Plan. • <i>Linee guida per il monitoraggio delle Azioni prioritarie del Piano triennale di contrasto allo sfruttamento lavorativo in agricoltura e al caporalato</i> (ILO, Rome, 2021).

Introduction

This training programme module concerns monitoring the Three-year Plan's performance — understood as a structured set of interventions (Priority Actions) aimed at preventing and tackling labour exploitation in agriculture. The monitoring system precisely articulates the definition of indicators, the method for their measurement, the required breakdown of data, the targets, the actors responsible for collecting information, and the periodicity of data collection.

Monitoring matrix

The monitoring matrix offers, for each Priority Action (Box 1):

- the **main results** (as defined in the three-year plan);
- the **definition of indicators** and their measurement method;
- the **targets to be achieved** (i.e., the expected level of indicators at a pre-established date);
- the **source of indicator data**;
- the **partner institution** is responsible for coordinates and monitors interventions.

The introductory part of the matrix for each action outlines the logical sequence that relates the planned interventions and the expected results. For example, the logical sequence of Action 2 (Agri-food supply chain) states that:

- | | |
|---------------|---|
| IF | the regulatory framework on unfair practices in the supply chain is completed |
| AND IF | the resources available — for investment, innovation, social accountability, and producer aggregation — increase, |
| THEN | there will be a measurable improvement in agricultural market efficiency. |

Table 1: Elements of the monitoring matrix

Title of Priority action as formulated in the Three-year Plan

Action 5: Planning and implementation of decent accommodation solutions for agricultural workers as an alternative to spontaneous settlements and other degrading housing

Main outcome	Indicator	Definition and measurement	Baselines, targets and sources	Unit in charge and frequency of data collection
5.3. Implementation of emergency housing interventions and company guesthouses as an alternative to spontaneous settlements in areas most at risk	50 per cent of agricultural workers in informal settlements have access to housing that meets nationally defined minimum quality standards	Number of agricultural workers in informal settlements who have access to housing solutions in line with minimum standards out of the total number of agricultural workers residing in informal settlements Type of indicator Result indicator	Baseline - Information on the number of agricultural workers in informal settlements not aggregated at the national level Value of the initial indicator (baseline) from which measurement begins Target By 2022, 50 per cent of agricultural workers in informal settlements will have access to emergency housing solutions that meet nationally defined minimum quality standards. Frequency: Annual Disaggregation - Characteristics of workers (gender, age, nationality) - Type of accommodation (temporary accommodation centres; diffuse accommodation; disused/confiscated public buildings; rehabilitated rural hamlets and private leases) - Geographical area Value of result indicator to be achieved by the end of the Plan Type of indicator (implementation or result) Level of disaggregation of indicator data	Unit in charge: National Association of Italian Municipalities (ANCI) Value of the initial indicator (baseline) from which measurement begins Frequency of data collection for monitoring The source of the information needed to measure the indicator value Data from the information system managed by the Information Systems DG of the MLPs)

Indicators have also been included in the monitoring matrix of the Three-year Plan to measure the overall result to be achieved at the level of the priority action. These outcome indicators are already included in the monitoring matrix. Still, they are suitable for measuring the action as a whole (Box 2, Key Indicators of the Plan).

For example, Priority Action 5 (Housing) provides various interventions to provide decent housing solutions to farm workers residing in informal settlements. This outcome indicator and the related target (50 per cent of farm workers in informal settlements have access to decent housing solutions) were also raised to the level of the priority action as the most suitable measure to monitor the progress of the action as a whole.

Table 2: Key indicators of the Three-year Plan

1.	Plan partner institutions using the information system
2.	Value added to agricultural producers for processed food products
3.	Agricultural enterprises registered in the Quality agricultural labour network
4A.	Italian and foreign agricultural workers employed illegally
4B.	Percentage of agricultural workers using Public employment centres
5.	Percentage of agricultural workers with access to decent housing
6.	Percentage of agricultural workers with access to dedicated transport
7.	Percentage of consumers made aware of ethical products
8A.	Percentage of agricultural enterprises inspected
8B.	Percentage of agricultural workers protected
9A.	Number of identified victims of labour exploitation in agriculture
9B.	Number of victims of labour exploitation in agriculture using protection services assistance
10.	Number of victims of labour exploitation in agriculture reintegrated into the labour market

Outcome indicators

The Plan's monitoring matrix focuses mainly on quantitative **outcome indicators** to facilitate the collection of monitoring data. The **process indicators** in the matrix were developed to measure outputs deemed necessary by institutional partners (e.g. the crop calendar in Action 1).

The outcome indicators comprise five elements essential for measurement (definition, breakdown, baseline, sources, and frequency).

Definition

The definition of the indicator outlines the parameters for what will be measured and how the measurement will take place. For example, the indicator Number of settled agricultural workers who have access to housing in line with minimum quality standards indicates that: (i) the figure must refer only to **sedentary** agricultural wor-

kers (and not to all agricultural workers); (ii) the accommodation must be in line with **predefined quality standards**, and therefore to measure the indicator it is necessary to have the quality criteria, the number of compliant accommodations, and — of this total — the number of those that have been made available to sedentary workers.

The “what” is measured, and the “how” and the “when” of the indicator should not change over time; otherwise, the analysis (which is an essential part of the monitoring system) is at risk. The definition of the elements that make up the indicator was agreed upon with the group of coordinators — for whatever reason — these definitions were to change over time, so it would be necessary to recalculate the baseline according to the new definitions.

For example, the indicator of Action 8 (Supervision) on the number of inspections carried out in the year in agricultural enterprises out of the total number of inspections and agricultural enterprises surveyed by INPS (National Institute for Social Security) consists of the following elements:

1. **Inspections** as classified and reported by INL (National Labour Inspectorate) in its annual report.
2. The **agricultural sector** as classified and reported by INL in the annual report (based on ATECO code).
3. **Total agricultural enterprises:** as defined by INPS (Agricultural Sector), i.e., enterprises with employees.

If one of the above definitions were to be changed — from the total number of agricultural enterprises surveyed by INPS to the total number of farming enterprises identified by ISTAT (Italian National Institute of Statistics) — then the 2019 baseline would have to be recalculated with the new parameters.

This indicator element defines how the data is to be measured and presented. For example, the indicator referring to decent housing for settled workers (see above) requires disaggregation by worker characteristics - particularly by age, gender, and nationality - by type of accommodation (long-term, emergency, guesthouse, scattered accommodation) and geographical area.

Disaggregation by worker characteristics makes it possible to assess whether the intervention favours the most vulnerable categories (e.g., single mothers, young people, non-EU migrants, etc.). In contrast, the disaggregation by type of accommodation makes it possible to assess which — among the different forms of housing — is the one that conforms best to the defined quality standards. The disaggregation by geographical area (basically at the regional level) makes it possible to assess the regional authorities' response to the housing emergency (i.e., given that Apulia, Calabria, and Sicily regions host the highest number of agricultural workers, a higher figure is expected in these regions).

Disaggregation

Baseline

The baseline is the starting point of the measurement. It makes it possible to assess whether the interventions are going in the expected direction. The baseline is also a tool to understand better the measurement type to be performed.

For example, the indicator of Action 8 (Supervision) Number of agricultural businesses inspected out of the total number of enterprises inspected annually - has as its baseline: '5,806 agricultural businesses inspected by INL in 2019, equal to 5.1 per cent of the total number of businesses inspected and 3.1 per cent of the total number of agricultural businesses surveyed by INPS'. The INL annual report for 2020 shows 4,269 inspections in the agricultural sector, representing 7.3 per cent of the total inspections and 2.3 per cent of the farms surveyed by INPS. In the report to Parliament, however, INL reports 5,372 inspections (equivalent to 2.9 per cent of farms). This discrepancy is due to the different periods in which the figure was measured (1st January to 31st December 2020 in the first case, 1 January 2020 to March 2021 in the second). To calculate the indicator, it is necessary: (i) the total number of farms inspected by INL in the different years; and (ii) the number of farms surveyed by INPS in the same reference period.

Source

Another critical element for measuring indicators concerns the source of the data from which to measure the indicator's value. In the example on supervision above, the sources are administrative data from the National Labour Inspectorate (annual report) and INPS (Agricultural Sector, statistics in brief).

Frequency

The last constituent element of the indicator is the periodicity, i.e., the time basis during which the indicator is to be calculated. In most cases, the plan's indicators provide for measurement on an annual basis (from 1st January to 31st December of each year). As far as possible, the yearly basis should be maintained, as it allows a comparative view of the progress of all Actions.

For example, the Action 3 indicator Number of farms enrolled in the Network shows the baseline available when the plan was formulated (3,900 farms as of February 2020). INPS data on the dedicated web page indicate that 5,166 farms had been admitted to the Network as of 2 December 2021. To assess the progress of Action 3 concerning other Actions, data on companies enrolled at the end of 2020 and the end of 2021 would have to be available.

Practical tips

The coordinators of thematic groups should always try to use the same definitions of the indicator elements to obtain valid monitoring results.

Indicator elements

In this regard, it would be appropriate for the group coordinators (or the person in the group in charge of monitoring) to detail the formulas to calculate each indicator. For example, for the Action 10 indicator "Number of victims of labour exploitation in agriculture who have access to quality social and labour inclusion services":

1. **Victims of labour exploitation** = Workers in the agricultural sector (persons 15-64 who work/have worked for at least one hour in the previous two weeks for remuneration in activities included in ATECO code 01.1- 01.6) who have been formally identified as victims of exploitation according to the National Guidelines.
2. **Social-occupational inclusion services:** Services included in the national system for the coordination of socio-occupational inclusion pathways and provided based on the quality criteria established by the system.
3. **Access:** Victims of labour exploitation registered by inclusion service providers as users of one or more services.

The monitoring matrix may evolve over time: if more detailed or accurate information for measuring progress becomes available, the indicator may be modified (and thus also the definition, measurement, baseline, and sources).

The same applies to indicators whose sources cease to exist. For example, the critical indicator of Action 2 (value added to agricultural producers for processed food products) is compiled by the e Institute of Services for the Agricultural Food Market (ISMEA) based on ISTAT and Eurostat data (see p. 49 of the report on the Competitiveness of the Agri-Food Industry 2018). Suppose ISMEA ceases to calculate the agri-food value chain. In that case, there are two viable options: attempt the calculation using the same method used by ISMEA in the past or develop a new key indicator for Action 2.

Should the group coordinators have doubts about the definition or measurement of the monitoring indicators, it is advised to refer to the information in the Roadmap (where all information available as of August 2020 is listed).

Concerning data collection, the monitoring matrix comprises three different types of indicators.

As far as possible, the indicators in the Three-year Plan were developed from **existing statistical or administrative data sources** and published at regular intervals (secondary data). This is the case, for example, of the indicators relating to companies registered in the Quality Agricultural Work Network (INPS), to surveillance activities in agricultural companies (INL), to funds invested in farm companies through supply chain contracts (MIPAAF) and the Innovation 4.0 Fund (MISE).

Data are **not readily available or aggregated at the national level** for some indicators. This is the case, for instance, for information on agricultural workers living in informal settlements, the number of victims of labour exploitation and agricultural workers using ICCs. In some cases, data collection may require an adjustment of the information systems already in the possession of the responsible institutions (e.g., ANPAL's [Restoincampo](#) application collects information on persons and companies using it and the data may be aggregated for the measurement of the intermediation rate bet-

Evolution of monitoring matrix

Reference to the road map

Data collection

Available sources of data

Not readily available data

ween labour demand and supply). In other cases, it is necessary to analyse administrative databases held by the institution responsible for the action and other partner institutions to check whether data can be extracted and aggregated to measure the indicator.

For example, the measurement of the indicator of Action 4A (labour flows) Number of regular entry quotas available on the total number of applications received (annual basis) requires examining the annual flow decree (Official Journal), extrapolating the quotas for seasonal work in the agricultural and hotel sector and comparing the figure with the number of applications received (unpublished administrative data from the Ministry of the Interior), to obtain the coverage rate. Another example of a measurement that requires an adjustment of the data collection system of the responsible institution is the number of agricultural vacancies filled by the CPI (job vacancy filling rate). ANPAL does not currently process this data, but information for its calculation is collected regularly.

Primary data collection

Only in a few cases is it necessary to resort to **primary data collection or statistical methodologies** to measure indicators (e.g., transport dedicated to agricultural workers, estimates of the number of exploited workers in agriculture).

The group coordinators responsible for the implementation and monitoring of the Priority Actions must therefore screen the indicators to verify the availability of the information needed. All the data collected and aggregated by the coordinators shall enter the information system managed by the DG Information Systems, Technological Innovation, Monitoring and Communication of the MLPS, which has the task to support the coordinators in the collection and processing of the data required for the monitoring activity.

To facilitate the aggregation of monitoring information, ILO has prepared two matrices. The first (see Table 1) aims to gather all data on the plan's indicators from the activities carried out at the institutional level (by national and regional authorities) in a single calculation tool. The project activities are implemented at the local level.

The second matrix (see Table 2) focuses on the indicators values on an annual basis (divided by Priority Action) concerning the set targets. This last matrix also shows the updated values of context indicators.

Examples of outcome indicators of the Plan

Action 3: Network of quality work in agriculture

Main output	Indicator	Definitions and measurement	Baselines, targets, and sources	Unit in charge and frequency of data collection
3.2. Expansion of the number of enterprises joining the Network of quality work in agricultural and developing a system of incentives for member enterprises.	10,000 enterprises carrying out agricultural or related activities are registered in the Network	Number of agricultural enterprises registered in the Network of quality work in agriculture	Baseline As of February 2020, there were approximately 3,900 enterprises registered in the Network, compared to more than 187,600 agricultural enterprises with employees as recorded by INPS. Target By 2022, at least 10,000 agricultural enterprises with employees will be registered in the Network Source INPS administrative data	Unit in charge: National Institute for Social Security (INPS) Frequency: Annual

The INPS website dedicated to the Network¹ reports 5,166 farms admitted at the end of 2021 out of a total of 183,057 farms surveyed at the end of 2020,² an increase of more than 32 per cent. The Network's coverage rate increased from 2 per cent at the beginning of 2020 to 2.8 per cent at the end of 2021.

¹ See [La rete del lavoro agricolo di qualità](#), INPS.
² See [Osservatorio sul mondo agricolo](#), INPS.

Action 4B: Labour supply and demand intermediation

Main output	Indicator	Definitions and measurement	Baselines, targets, and sources	Unit in charge and frequency of data collection
4.3. Improvement of the efficiency and effectiveness of Employment Centre services (CPI) to workers and employers in the agricultural sector through the activation of a platform for matching labour supply and demand, the definition of essential assistance levels (LEAs), the simplification of administrative procedures for the recruitment of agricultural workers and the continuous training of operators	10 per cent of seasonal employment relationships are initiated by Employment centres	- Number of seasonal reports initiated by Employment centres out of total seasonal reports Type of indicator Outcome indicator Disaggregation - Characteristics of workers (age, gender, nationality) - Regions	Baseline 2 per cent of seasonal employment is through public Employment centres Target In 2022, 10 per cent of seasonal labour relations in agriculture (annual basis) will be initiated by Employment centres Sources - Data from the ANPAL platform - INPS data on labour relations initiated	Unit in charge: National Agency for Active Labour Market Policies (ANPAL) Frequency: Annual

In 2020, 1.6 million employment contracts were initiated in agriculture, of which more than 98 per cent were for fixed-term contracts, including seasonal work (Quarterly Note on employment trends, Q4 2020). In the same year, new employees for whom the Employment Centres were the most helpful search action amounted to 1.4 per cent of the total number of new employees (Istat, Labour force survey).

ANPAL data (Employment centres monitoring, 2020) report that in the two years 2019-2020, about 2.9 million people were taken on. Of these, 1.3 million signed a Service Agreement. At the time of the ANPAL survey, 491,000 ICCs users were employed. For 34,900 of these, the Employment centre was the channel for obtaining work (7.1 per cent of users with an employed service pact).

Action 9: Protection and assistance

Main output	Indicator	Definitions and measurement	Baselines, targets, and sources	Unit in charge and frequency of data collection
9.3. Provision of protection and assistance services for victims of labour exploitation	Number of victims of labour exploitation in agriculture identified and supported by protection and assistance services	- Number of victims identified and supported by protection and assistance services Type of indicator Outcome indicator Disaggregation - Characteristics of victims (gender, age, nationality)	Baseline In the first half of 2019, 33 victims of labour exploitation were taken in by the national anti-trafficking system. Target By 2022, identified victims of labour exploitation will have access to customised protection and support services. Source Administrative data from the information system managed by the Information systems DG of the MLPS	Unit responsible: DG Immigration and DG Inclusion of the Ministry of Labour and Social Policy (MLPS) Frequency: Annual

In 2020, INL reported identifying 1,104 victims of exploitation (675 by the Comando Carabinieri Tutela del Lavoro and 429 by INL). The Guardia di Finanza (Finance Police), in May 2020–June 2021, identified 1,370 victims of exploitation (report to the Parliament on the implementation of the Three-year Plan, Annex 1). There is no information on victims' access to support services.

Examples of data collection

B4-12

Table 1: Plan indicator data collection matrix (Action 1-3)

Cumulative indicators Three-year Plan to tackle labour exploitation in agriculture

Actions of the Three-Year Plan	Definition of indicators	Physical indicators			
		2020	2021	2022	Total
Action 1 – Information system	Crop harvesting calendar by geographical area				
	Number of Italian and foreign workers needed for production in the agricultural sector				
	Profiling system to define geographical maps of labour exploitation risk				
	Number of irregular workers in the agricultural sector				
	Number of agricultural workers victims or at risk of labour exploitation				
Action 2 – Agri-food supply chain	Regulatory framework on sales below cost and other unfair practices				
	Number of enterprises accessing supply chain contract funds (MIPAAF)				
	Number of enterprises accessing Impresa 4-0 funding (MISE)				
Action 3 – Quality agricultural labour net-work	Number of agricultural enterprises registered in the Network by Region				
	Number of Network member farms with access to subsidies				
	Number of enterprises in the agri-food chain using joint and several responsibility practices				
	Number of farms registered in the Network that adhere to ethical certification schemes				
	Number of consumers aware of the Network and its role in promoting agricultural products and decent work				

Table 2: Example of matrix for monitoring the Plan (Action 2)

Action 2: Agri-food supply chain

	Target	Baseline	Source	Status 2020	Status 2021
	50 per cent increase in value added to agricultural producers for processed food products	Added value for the farmer of around two euros per 100 euros spent by consumers			
Main outcomes	Target	Baseline	Source	Status 2020	Status 2021
Completing the regulatory framework on unfair commercial practices in the agricultural and food supply chain	The law on below-cost selling, double-bottom auctions and regulation of ethical production chains comes into force by 2021	Bill No. 1373 on Restrictions on the sale below the cost of agricultural products and prohibition of double-bottom auctions was approved on 27 June 2019 by the Chamber of Deputies and is under consideration by the Senate of the Republic.	Official Journal		
	The decree implementing EU Directive 2019/633 on unfair commercial practices comes into force by 2021	Bill 1721 of 2019 (Delegation of power to the Government for the transposition of European directives and the implementation of other acts of the European Union - European Delegation Act 2019), Article 7 providing for the delegation of power to the Government for the transposition of European Directive 2019/633, is currently under consideration in the Senate.	Official Journal		
Strengthening and expansion of incentives on supply chain contracts for investment, technological innovation, corporate social accountability, and producer aggregation	By 2022, the funds available for supply chain contracts amount to approximately EUR 730 million annually.	At the end of 2019, public investment in supply chain contracts amounted to EUR 520 million.	Ministry of Agriculture, Food and Forestry (MI-PAAF)		
Access by agricultural enterprises to investments under the Innovation Credit and other measures in the National Enterprise 4.0 Plan	At least 675 agricultural enterprises have access to Impresa 4.0 Plan funding on an annual basis	In 2018, companies in the agricultural sector accounted for 3.6 per cent of the total number of companies benefiting from aid called 'Capital goods - Nuova Sabatini', double the number of agricultural beneficiary companies registered in the period 2014-2017. By September 2020, the tools of the Enterprise 4.0 Plan had allocated around €9.4 million to 613 agricultural companies.	Ministry of Economic Development (MISE)		

Activity: data collection

The following table provides an example of data collection for measuring the plan's key indicators (Table 3).

Table 3: Data collection for monitoring key indicators

N.	Definition of indicators	Indications for measurement
A1	Plan partner institutions using the information system. Baseline: zero Source: MLPS Information System	Indicator value: Not available
A2	Value added to agricultural producers for processed food products. Baseline: In 2018, an added value for the farmer is around two euros per 100 euros spent by consumers. Source: ISMEA, Competitiveness of the Italian Agri-Food Industry, 2019).	Indicator value: The ISMEA report on the food industry in Italy (Performance of enterprises to the Covid-19 test) confirms the figure for the following years (two euros net to the entrepreneur per 100 euros spent by the consumer)
A3	Agricultural enterprises registered in the Quality Agricultural Labour Network Baseline: February 2020, 3,900 registered companies Source: INPS database on Network	Indicator value: At the end of 2021, there were 5,166 companies admitted to the Network
A4(a)	Italian and foreign agricultural workers employed illegally. Baseline: 34.9 per cent of self-employed agricultural workers were irregular in 2018 Source: ISTAT, regular and irregular work	Indicator value: In 2019, the irregularity rate was 34.2 per cent
A4(b)	Percentage of agricultural workers using Public Employment Centres (CPI) Baseline: In 2017, only 2 per cent of seasonal employment was through Employment Centres Source: ANPAL, administrative data	Indicator value: Not available
A5	The proportion of agricultural workers with access to decent housing Baseline: Not available at the national level Source: MLPS Information System	Indicator value: Not available, under development
A6	Percentage of agricultural workers with access to dedicated transport. Baseline: Not available Source: MLPS Information System	Indicator value: Not available
A7	The proportion of consumers made aware of ethical products. Baseline: Not available Source: Before/after the MLPS survey	Indicator value: Not available
A8 (a)	Percentage of agricultural enterprises inspected. Baseline: In 2019, approximately 5,800 inspections were carried out in the agricultural sector Source: INL, Annual Report	Indicator value: In 2020, some 4,270 agricultural enterprises were inspected by INL, 7.3 per cent of total inspections and 2.3 per cent of agricultural enterprises
A8(b)	Percentage of agricultural workers protected. Baseline: In 2019, some 5,340 workers were protected Source: INL, Annual Report	Indicator value: 4,590 workers were protected in 2020

Follows...

... followed

N.	Definition of indicators	Indications for measurement
A9 (a)	Number of identified victims of labour exploitation in agriculture. Baseline: Zero Source: MLPS Information System	Indicator value: (2,474, INL + Guardia di Finanza)
A9(b)	Number of victims of labour exploitation in agriculture using protection services assistance. Baseline: Zero Source: MLPS Information System	Indicator value: not available
A10	Several victims of labour exploitation in agriculture reintegrated into the labour market. Baseline: Zero Source: MLPS Information System	Indicator value: not available

Table 3 can be transformed into an individual or group activity in which participants are asked to collect information on the value of the vital indicator based on the data source used to construct the baseline. Participants may: (i) use information in the public domain (websites, research, open access administrative data); (ii) refer to administrative data in their possession; and (iii) make specific requests to representatives of other institutions that may have the information.



Module B5

**Monitoring the initiatives
to prevent and tackle
labour exploitation**

Monitoring the initiatives to prevent and tackle labour exploitation

Learning objective	By the end of the training module, participants will have: • Analysed developing performance indicators for regional initiatives to prevent and tackle labour exploitation. • Discussed how to build a monitoring system and organise data collection.
Time requested	Two hours and 30 minutes
Teaching resources	• Interactive sessions with questions and answers (intervention objectives, formulation of indicators, sources of monitoring data).
Read more:	• <i>Linee guida per il monitoraggio delle Azioni prioritarie del Piano triennale di contrasto allo sfruttamento lavorativo in agricoltura e al caporalato</i> (ILO, Rome 2021).

Introduction

This module aims to discuss the formulation of performance indicators of regional policy interventions to counter labour exploitation, constructing a performance monitoring system, and organising data collection activities. The module is based on information provided by the regions on public policies (laws, resolutions, and strategies) implemented or aimed at preventing and tackling labour exploitation.

As mentioned in Module 3, monitoring systems for public interventions are based on **performance indicators** — summary measures to check the progress of interventions at regular intervals. Typically, performance monitoring systems include four types of indicators: the baseline (the value of the indicator before the intervention is implemented), implementation indicators (aimed at measuring the input-activity-output relationship), outcome indicators (aimed at measuring the results produced through outputs) and context indicators (secondary statistical data that aim to contextualise interventions).

Objectives

The first step in identifying outcome indicators for a public policy intervention to prevent and tackle labour exploitation is the identification of the objective of the intervention, which enables the measurable expression of the results to be achieved. Often the purposes of a policy intervention are not clearly expressed or are understood, which requires — before formulating the indicators — to detail “what” the policy intervention intends to achieve.

Box 1: Resolution of the Lombardy Region Council (No. 2490/2014)

The Resolution of the Lombardy Region Council (No. 2490/2014) “Promotion of integrated interventions with local police forces to prevent and tackle the phenomenon of gangmaster system” (unlawful recruitment in agriculture) — The cooperation agreement scheme to implement the interventions provides:

- “Promoting and implementing integrated interventions with the Local Police forces of provincial capitals to prevent and tackle gangmaster system”.
- “Signing cooperation agreements between the Lombardy Region and the municipalities and provinces, to promote, through the local police forces of the respective administrations, activities to prevent and tackle the phenomenon of gangmaster system and to define specific commitments, also financial ones, to be borne by each administration”.

The outline of the cooperation agreement (Article 3) — attached to the Resolution — provides for the commitment of the partner municipalities and provinces to identify the local police officers who will participate in the training activity set up by Éupolis Lombardy on the specific topic of gangmaster, to raise awareness on phenomenon and develop the tools necessary to develop correct operational procedures.

Table 1: What is the objective of the intervention, and what are the indicators?

Objective	Indicators
1. Carrying out integrated interventions with local police forces to prevent and tackle the phenomenon of gangmaster (unlawful recruitment).	• Number of integrated prevention and anti-exploitation interventions implemented in partner municipalities/provinces. • Number of victims of labour exploitation in the municipalities/provinces of Lombardy.
2. Increasing the knowledge of local police officers on labour exploitation and providing them with the tools to develop correct operational procedures.	• Number of integrated prevention and law enforcement interventions based on effective operational procedures. • Number of victims of labour exploitation in the municipalities/provinces of Lombardy Region.
3. Training local police officers on labour exploitation and providing them with suitable tools to develop effective operational procedures.	• Number of local police officers trained in labour exploitation. • Number of victims of labour exploitation in the municipalities/provinces of Lombardy Region.

Box 2: Regional Law of the Piedmont Region (No. 12 of 2016)

Regional Law No. 12 of 2016 of the Piedmont Region 'Provisions for the temporary accommodation of seasonal farm workers on Piedmonts farms. (Modification of the Regional Law of 5 December 1977, n. 56 (Protection and use of the soil)' gives direct growers and professional agricultural entrepreneurs the right to temporarily accommodate seasonal agricultural workers during fruit harvesting and cultivation-related activities. The following are allowed: (i) hygienic and sanitary adjustment works of up to two hundred square metres in existing non-residential structures for the temporary accommodation of seasonal farm workers and (ii) the seasonal installation of prefabricated structures for a period not exceeding one hundred and eighty days per year.

Interventions carried out by public entities or associations with an agreement with these same entities may provide for similar installations of up to two thousand square metres, with a contribution from the region of up to a maximum of 25,000 euros.

The aim of the regional Law — as stated in Article 1 — is to support seasonal work in agriculture and prevent exploitation and gangmaster (unlawful recruitment).

Table 2: What is the objective of the intervention, and what are the indicators?

Objective	Indicators
- Enabling companies to set up company guest houses for seasonal workers. - Incentivising the construction of temporary guest houses by public bodies or affiliated associations.	- Number of seasonal workers during the fruit harvest accommodated: i) in company guesthouses and ii) in public guesthouses

Box 3: Council Resolution of the Tuscany Region (No. 1397/2021)

The Tuscany Region Council Resolution (no. 1397/2021) approved the guidelines “Procedural indications to entrepreneurs for the conscious and correct identification of service providers and performers of agro-forestry work”. The purpose of the guidelines is to “...help agricultural and forestry enterprises (which resort to outsourcing of the work necessary to run their production cycles) to put in place measures aimed at minimising the risk of the occurrence of illicit intermediation in the encounter between labour supply and demand”.

In this case, the objective is to minimise the risk for enterprises using labour contracting and other forms of outsourcing of work to incur the offence of illicit intermediation. The resulting indicator should therefore be built on a decrease in the number of agricultural and forestry enterprises incurring the offence of illegal intermediation. In this case, the main difficulty is creating a baseline (number of enterprises incurring the offence of illicit intermediation).¹.

The easiest way to relate the objectives and expected results is to develop the logical sequence of the intervention.

For example, the logical sequence of the intervention on the corporate guest houses in the **Piedmont Region** is that:

- IF** farms are allowed to adapt existing facilities to house seasonal workers
- AND IF** the region offers resources to local public authorities for the construction of guest houses for seasonal workers,
- THEN** the number of seasonal workers housed in temporary guesthouses in line with sanitary standards will increase (or the number of seasonal workers living in informal settlements will decrease).

¹ The guidelines only state that “The vast majority of companies do not consciously resort to unlawful recruitment practices and these Guidelines are intended to support companies concerning the risks and consequences that an assignment of ‘turnkey’ work to external companies could entail with significant penalties and sanctions”.

The logical sequence of the **Tuscany Region's** intervention could be:

- IF** companies using forms of labour contracting are provided with tools to identify illegal forms of intermediation,
- THEN** there will be a decrease in the number of companies incurring the offence of illegal intermediation.

While the logical sequence of the **Lombardy Region's** intervention can be outlined as follows:

- IF** local police increase — through training — knowledge about labour exploitation
- AND IF** local police have developed effective operational procedures,
- THEN** the number of workers victims of labour exploitation in the municipalities/provinces of Lombardy region will decrease.

Outcome indicators consists of five elements, each essential for their measurement (definition, breakdown, baseline, sources, and frequency). The definition of the indicator outlines the parameters of what will be measured and how the measurement will take place.

For example, the indicator relating to the **Tuscany Region** guidelines 'number of agricultural and forestry enterprises that unknowingly incur the offence of unlawful intermediation in the contracting of labour or other forms of outsourcing and outsourcing of work' indicates that the figure must refer to agricultural and forestry enterprises that use forms of labour contracting (and not all enterprises). To measure the indicator, it is, therefore, necessary to have the total number of agricultural and forestry enterprises that use forms of labour contracting or outsourcing of work and that may consequently incur the offence of unlawful intermediation (it could be assumed that all enterprises that use forms of outsourcing are at risk of incurring unlawful intermediation).

Lazio Regional Law No. 12 of 2019 provides for a series of interventions to tackle workers exploitation, including establishing Computerized reservation lists for the agricultural sector at the Employment Centres (CPI) (Article 3). The intervention aims to facilitate the matching of labour supply and demand in the industry and combat illicit intermediation. The definition of the result indicator could be: 'Number of workers (or enterprises) using the Computerized lists prepared by the Employments Centres to search for work (or workers) in the sector'. In this case, the figure refers to the number of people who use the directories to look for work in agriculture (compared to all those who look for work in the sector).

The "what" is measured, and the "how" and the "when" of the indicator should not change over time to avoid jeopardising the analysis. Should the definition of the elements constituting the indicator shift over time, it would be necessary to recalculate the baseline according to the new definitions.

Outcome indicators

Disaggregation

Disaggregation defines how data should be measured and presented. For example, the indicator referring to guest quarters for seasonal workers in the **Piedmont Region** (see description above) should provide for disaggregation by worker characteristics — and by age, gender, and nationality — by type of accommodation (company or public guest quarters), and by geographical area (municipalities in fruit sector of Saluzzo area). The same applies to the example of **Lazio Region**, where the disaggregation by workers' characteristics will make it possible to understand for which type of workers the computerised reservation lists are most employed (e.g., young workers with a medium level of education).

Disaggregation by worker characteristics allows one to assess whether the intervention benefits the most vulnerable groups; disaggregation by type of service rendered allows one to consider which intervention is most used by the target group. Disaggregation by geographical area allows one to assess in which areas the intervention is most effective.

Baseline

The baseline (initial indicator) is the measurement starting point. It makes it possible to assess whether the interventions are going in the expected direction. The baseline is also a tool to understand better the measurement type to perform.

Riquadro 5: Protocol for the reconversion of the reception centre for asylum seekers in Borgo Mezzanone, Apulia Region

The Protocol for the reconversion of the reception centre for asylum seekers in Borgo Mezzanone, in the Province of Foggia, — signed in 2021 by the Ministry of the Interior, the Apulia Region, the Province of Foggia and the Prefecture of Foggia — provides for the construction of a temporary guesthouse with housing modules to accommodate seasonal workers and the installation of an employment centre. The region has undertaken to install 250 prefabricated housing modules (about 1,000 places) and to renovate buildings to provide another 300 places. The intervention aims to overcome the spontaneous settlement of the former Borgo Mezzanone runway and develop actions aimed at social integration and including seasonal workers in the regular labour market.

Indicators to measure the results envisaged by the Protocol could be formulated as (i) the number of seasonal foreign workers accommodated in the housing modules provided by the region and (ii) the number of seasonal workers included in the regular labour market (through the Centre for Employments services).

Estimates from the Apulia region indicate that the residents of the spontaneous settlement of Borgo Mezzanone number more than 2,000 during seasonal peaks, mainly migrants from Somalia, Sudan, Eritrea, Nigeria, Senegal, and Ghana. This figure becomes the baseline to measure the intervention's progress to overcome the spontaneous settlement.

For the baseline of the second indicator (workers entering the regular labour market), two options can be considered: (i) one can consider all persons present in the settlement as informal workers (2,000 seasonal workers), which may be a distortion of reality (since not all of them work in agriculture); or (ii) start from an 'unavailable' baseline (because there are no reliable data on the number of informal seasonal workers residing in the settlement) and build the indicator over time. To calculate the first indicator, it is, therefore, necessary to have: (i) the number of presences in the informal settlement before the intervention; and (ii) the number of seasonal workers who are housed on an annual basis in the guest houses made available by the region.

When the baseline is unavailable (because the intervention represents a new initiative or because the data do not exist or are unreliable), it is necessary to consider how much this may jeopardise data collection. If no data exist, the baseline becomes 'not available'. In the example of the **Lombardy Region** intervention (training of local police officers for the implementation of integrated labour exploitation interventions), the indicator predicts a decrease in victims of labour exploitation, which should be based on (reliable) estimates of the number of exploited workers in the region.

The indicator requires a system to bring together data on interventions carried out and the number of exploited workers identified during the interventions. If this is not possible, the indicator should be reformulated.

Another critical element for measuring indicators concerns the source of data from which to measure the indicator value. In the example of the **Apulia Region** (number of seasonal workers hosted in the housing modules), the data source is (i) the register of persons hosted and (ii) INPS administrative data on seasonal workers in the area (to be certain that the guests are seasonal workers). The two data may not coincide since only some of the persons hosted will be workers with seasonal employment contracts registered with the INPS.

The measurement of the **Tuscany Region's** intervention indicator (guidelines to avoid the risk of illicit brokering) may require collecting primary data.

Table 3: Which data sources should be used?

Outcome indicator	Baseline	Source
Number of agricultural and forestry enterprises incurring the offence of unlawful intermediation in the contracting of labour or other forms of outsourcing and contracting out of work	Not available The guidelines do not provide data on this, but it could be considered that all companies in the sector that use forms of contracting are at risk.	If a mailing list of the companies to which the guidelines were sent existed, one could organise sample interviews to find out how many of the companies to which the guidelines were sent had ongoing investigations for unlawful intermediation, or one could use the administrative data of the Territorial Labour Inspectorate (ITL), starting from baseline zero and measuring the trend of the data over time.

A problem of sources could also exist for the intervention of the **Piedmont Region** (company guest houses). While the guest houses managed by the local authorities keep registers of the persons housed (administrative-financial reporting), data on workers accommodated in company guest houses may not be available (unless the region has imposed an obligation on employers to communicate the lists of workers to whom housing is provided).

Frequency

The last essential element of the indicator is frequency, i.e., the time basis during which the indicator is calculated. Usually, the outcome indicators of a public policy intervention provide for an annual assessment (from 1st January to 31st December). The yearly basis allows for a comparative view of the progress of all ongoing initiatives in labour exploitation.

To obtain valid monitoring results, it is advisable to use the **same indicator definitions**. In this regard, it is helpful to detail the meaning of the various terms used in the indicator and to include formulas for calculation.

For example, in the case of the guest houses in Apulia Region, if the indicator **‘Number of seasonal foreign workers housed in the housing modules provided by the Region’** is measured based on INPS data, the UNIEMENS definitions should be used, i.e., 1 :

i) *Seasonal foreign worker:*

Private sector employees, ISTAT Ateco 2007 code 01.10 to 01.64 (of livestock and mixed agricultural activities are also included), age, sex, and nationality (as per tax code) and type of employment (seasonal contract).

ii) (ii) *Accommodation in housing modules:*

Calculated on inputs and length of stay.

In the case of **Lazio Region** (computerized reservation lists), the definitions of the indicator: **‘The number of workers using the Computerized lists prepared by the Employment Centres (CPI) to search for work in the sector’**, must refer to the definitions of the labour force survey and the definitions used by the CPIs, i.e.,

i) *Workers looking for a job in the Province of Latina (to calculate the rate of utilisation of the lists)*

Unemployed persons 15-74 years old who (i) have carried out at least one job search in the last four weeks and (ii) are available in the next two weeks to work (or start their own business)

ii) *Workers registered in the Computerized lists of the CPI (Province of Latina)*

Here it is necessary to refer to the administrative data generated by the reservation lists maintained by the ICCs (which should include gender, age, nationality, and so on).

Targets

A target is the value (number, mean, median or percentage) the result indicator should reach in a predetermined timeframe.

For example, the 2021-2023 Training plan of the **Tuscany Region** for safety and health in the workplace (DGR no. 944 of 2021) provides for the activation of training courses aimed both at the unemployed and those interested in working seasonally in agriculture and at trainers and technicians who provide consultancy and support to companies in the agricultural and forestry sector. The programme also foresees modules dedicated to ‘raising awareness on the issues of labour exploitation, illegality, and gangmaster system, which significantly contribute to undermining the safety of working environments, with a particular focus on the problems regarding foreign workers.

The intervention objective is to decrease occupational accidents and illnesses in the agricultural sector, with the following logical chain:

- IF** workers are trained on the risks of agricultural work and provided with tools to minimise them
- AND IF** farms are given the tools to minimise health and safety risks related to work in agriculture,
- THEN** the number of agricultural workers who are victims of occupational accidents and diseases will decrease.

If this were the case, the result indicator would be expressed as **'number of seasonal workers in the agricultural sector victims of accidents at work and affected by occupational diseases'**. The baseline is provided by INAIL data that report 2,184 accidents in agriculture in 2020 in Tuscany and 594 workers affected by occupational diseases. INAIL data indicate that: (i) occupational diseases in the sector decreased by 39 per cent compared to 2016 (and by 22.5 per cent between 2019 and 2020), and (ii) injuries decreased by 29 per cent over the same period (25 per cent between 2019 and 2020).

A possible target could be that **by the end of 2022, there is a 30 per cent decrease in the number of seasonal workers in the agricultural sector who are victims of occupational accidents and suffer from occupational diseases** (25 per cent 'physiological' and 5 per cent due to training).

Measurable targets can only be expressed for indicators that have a reliable baseline. When the result indicator has zero baselines (or no baseline available), the target can only be defined as the first implementation period using the data generated during the period as a baseline.

For example, the indicator for the **Piedmont** farm guesthouse intervention (**number of seasonal workers hosted in farm guesthouses and guesthouses organised by local authorities**) has a zero baseline. Still, the 2017 data can be used to construct a target as a baseline for subsequent years. For example, if 2017 900 foreign workers were accommodated (out of an estimated total of 3,400 workers of African origin who arrive in Saluzzo annually for the fruit harvest) in 2018, the calculation of the indicator would start from 900 workers, with the expectation of having an increase in workers accommodated in guest houses and a decrease in those living in spontaneous settlements.

A sound monitoring system of public policy interventions should include both outcome indicators — the most relevant to understand whether deviations from the intended results of the intervention are occurring — and implementation indicators. The latter is vital for managing the intervention and especially for understanding whether the outputs resulting from the activities performed are leading to the expected outcome.

Implementation indicators

To facilitate data collection regarding indicators, it is possible to match the implementation indicators with the administrative-financial indicators. The following table offers some implementation indicators for the regional interventions mentioned in the previous paragraphs.

Table 4: Examples of implementation indicators of regional interventions

Region	Iniziativa	Implementation indicators
Lombardy Region	Regional and municipal/provincial agreements for the training of local police officers to develop procedures to tackle labour exploitation	• Number of agreements signed between the region and the municipalities/provinces (territory coverage) • Number of participants in training activities (out of the total number of local police officers, coverage of the target group)
Piedmont Region	Company and local authority guesthouses to house seasonal workers	• Number of local authorities participating in the initiative (out of the total number of municipalities in the Saluzzo fruit sector). • Number of farm guesthouses organised by farmers. • Number of company guesthouses organised by local authorities
Lazio Region	Computerized directories for matching supply and demand for agricultural labour	• Number of Employment centres (CPI) in the Province of Latina where the service is offered (out of the total number of Employment Centres in the province)
Apulia Region	Regional guesthouses for seasonal farm workers to overcome informal settlement	• Number of housing modules made available to seasonal workers, and related places
Tuscany Region	Guidelines for agricultural enterprises contracting labour or outsourcing work to avoid illegal intermediation	• Several companies in the sector were informed about the contents of the guidelines. • Number of enterprises in the sector using the labour contract guidelines.
Tuscany Region	Safety and health training plan	• Number of training courses activated in the agricultural sector. • Number of participants in training courses for the agricultural sector.

The construction of a system to monitor the performance of regional interventions to tackle labour exploitation comprises several steps.

Identify all the region's interventions that directly or indirectly contribute to the final aim (preventing and tackling exploitation).

Definition of the objectives of each intervention (to create outcome indicators).

Developing outcome indicators (defining and measurement, disaggregation, baseline, and data sources) and implementation indicators (monitoring matrix).

As far as data collection is concerned, a monitoring matrix usually includes three different types of indicators.

1. As far as possible, outcome indicators should be created on existing statistical or administrative data sources and published at regular intervals (secondary data). This is the case, for example, for indicators on enterprises registered in the Network of Quality Work in Agriculture (INPS) and seasonal labour relations initiated (INPS).
2. For some indicators, data are not readily available or aggregated at the regional level. This is the case, for instance, for information on agricultural workers living in informal settlements and agricultural workers using Employment Centres (CPI). In some cases, data collection may require an adjustment of the information systems already in possession of the responsible institutions (e.g., the computerized directories of Lazio collect information on persons and companies using it, and the data may be aggregated for the measurement of the intermediation rate between labour demand and supply). In other cases, it is necessary to analyse the administrative databases of the various partner institutions to verify whether data can be extracted and aggregated to measure the indicator (e.g., use of the free transport card).
3. Only in some cases is it necessary to resort to primary data collection or statistical methodologies to measure indicators (e.g., the number of seasonal workers aware of the services provided by the region, which requires a before-and-after survey).

The system of indicators developed for monitoring regional policy initiatives should be tested to see whether:

- The indicators are correctly formulated and measure what is to be measured.
- The data collected are reliable (if this were not the case, the indicator would have to be changed) and are available within the timeframe required for monitoring.
- Data collection is manageable with the resources available at the regional level.

Monitoring regional interventions

Identification

Definition

Development of outcome indicators

Data collection

It is helpful to prepare all indicator data from the activities carried out at the institutional level (Table 5) and the project activities implemented at the local level (the subject of the following training module) in a single calculation to facilitate the aggregation of monitoring information.

Table 5: Data collection matrix regional initiatives

Cumulative indicators — institutional activities				
Regional actions	Indicatori fisici			
	Definition of indicators	2022	2023	2024
Computerized directories	Number of seasonal reports initiated by Employment centres			
Transports	Number of agricultural workers using the free public transport card			
Network of quality work in agriculture	Number of agricultural enterprises registered in the Network of quality work in agriculture			
Housing	Number of seasonal workers housed in the company and local authority guest houses			
Information campaign	Number of workers informed about available services			

Examples of interventions at regional level

Below, a list of interventions implemented at the regional level covering the most common policy areas for tackling labour exploitation is proposed to provide a practical example of how to construct a performance monitoring matrix, starting with the description of the interventions.

Table 6: Interventions, objectives, and indicators

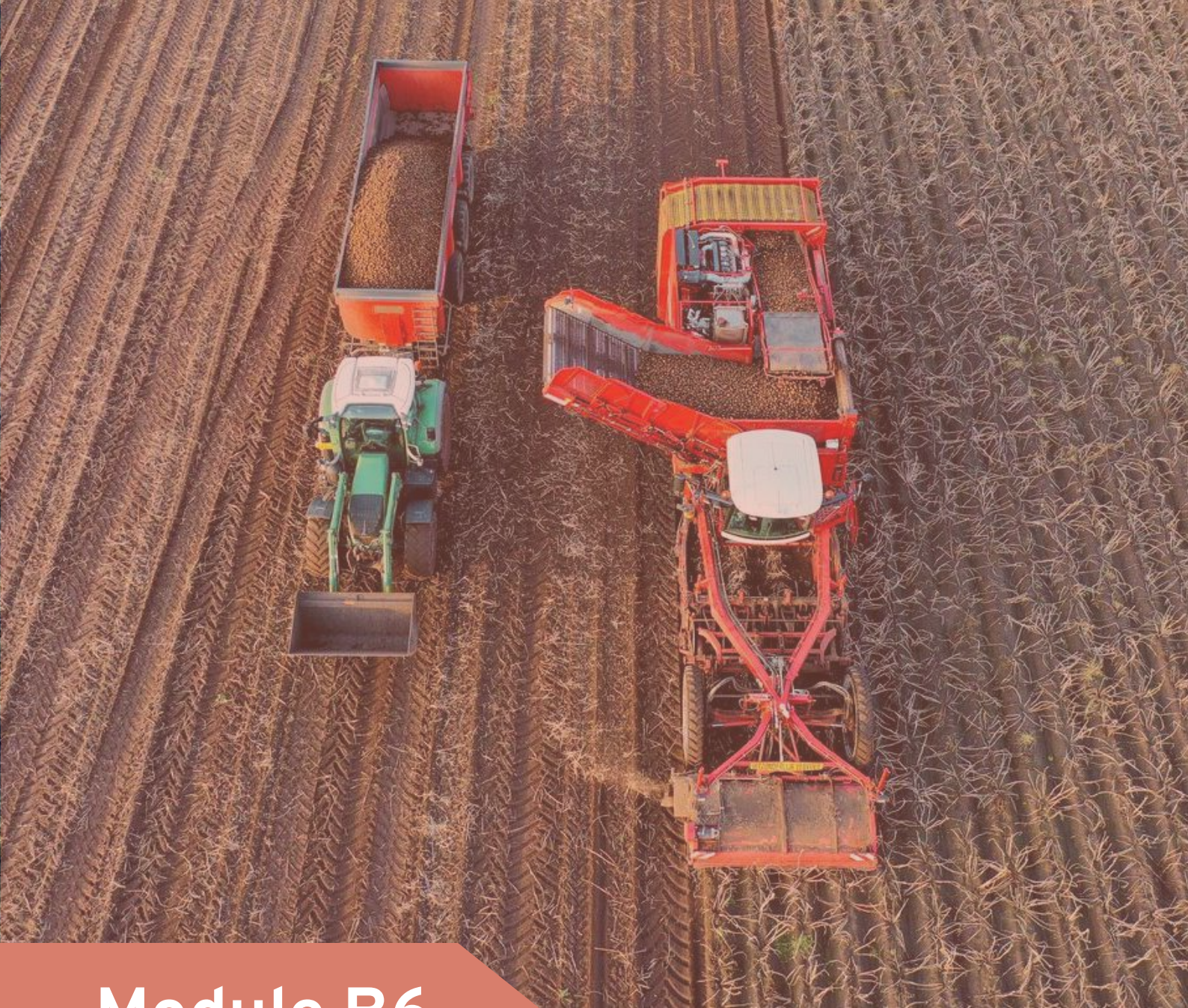
Intervention	Description	Objectives	Outcome indicators
Computerised reservation lists	Creation of computerised reservation lists at the Employment centres (CPI)	Facilitating job matching in agriculture	Number of workers using the computerized lists prepared by the CPI to search for work in agriculture (out of the total number of job seekers in the sector)
Free transport card for workers registered in the electronic lists	Allocation of free public transport cards to persons on the reservation lists	Offering seasonal workers free transport services to and from their places of work	Number of seasonal workers using the free transport card
Reward system for joining the Network of quality work in agriculture	Making the disbursement of regional funds to agricultural enterprises conditional on joining the Network	Encouraging agricultural enterprises in the region to join the Network	Number of farms joining the Network
Temporary guesthouses (housing modules)	Installation of 100 housing modules	Providing decent housing for seasonal workers	Number of foreign seasonal workers accommodated in housing modules provided by the Region
Information and awareness campaign	Regional campaign in five languages to inform foreign workers in agriculture of the services offered (computerised directories, transport, accommodation, mobile units)	Informing foreign agricultural workers about the services that are available to counter labour exploitation	Number of foreign workers who are aware of available services

Table 7: Monitoring matrix

Intervention	Outcome indicators	Baseline, target and sources	Unit in charge and frequency
Computerised reservation lists	- Number of workers using the Computerized lists prepared by the Employment Centres (CPI) to search for work in agriculture Disaggregation: - Characteristics of workers (age, gender, nationality)	Baseline: - At the end of 2021, only 2 per cent of seasonal employment relationships were through public employment centres Target: - By the end of 2023, 10 per cent of seasonal work relationships will be through the Region's public employment centres Sources: - Administrative data of the Regional Employment Agency - INPS data on labour relations initiated	Unit in charge: - Regional employment agency Frequency: - Annual
Free transport card for workers registered in the computerized lists	- Number of seasonal workers using the free transport card Disaggregation: - None	Baseline: - Not available Target: - By the end of 2023, 20 per cent of seasonal workers will use public transport Sources: - Administrative data of the Regional mobility agency - INPS data on seasonal labour relations initiated	Unit in charge: - Regional agency mobility Frequency: - Annual
Reward system for joining the Network of quality work in agriculture	- Number of farms joining the Network Disaggregation: - None	Baseline: - At the end of 2021, there were approximately 550 companies registered in the Network in the region, compared to more than 1,500 agricultural companies with employees, as recorded by INPS Target: - By 2022, at least 1,000 agricultural enterprises with employees will be registered in the Network Sources: - INPS administrative data	Unit in charge: - National social security institute (INPS) Frequency: - Annual
Followed ...			

... follows

Intervention	Outcome indicators	Baseline, target and sources	Unit in charge and frequency
Temporary guesthouses (housing modules)	- Number of foreign seasonal workers accommodated in housing modules provided by the Region Disaggregation: - Characteristics of workers (gender, age, nationality) - Type of guesthouse (corporate or local authority)	Baseline: - Approximately 2,000 people living in spontaneous settlements Target: - By 2023, 80 per cent of farm workers in spontaneous settlements will have access to housing modules Sources: - Data from local authority guesthouse registers - Data from corporate guesthouse registers	Unit in charge: - Region (labour and welfare departments) Frequency: - Annual
Information and awareness campaign	- Number of foreign workers who are aware of available services Disaggregation: - None	Baseline: - Foreign agricultural workers need more information on the services available at the regional level Target: - By 2023, 50 per cent of foreign agricultural workers will be informed about available services Sources: - Before/after survey	Unit in charge: - Region (social communication) Frequency: - One-off



Module B6

Monitoring the performance of projects to prevent and tackle labour exploitation

Monitoring the performance of projects to prevent and tackle labour exploitation

Learning objectives	- Analysing the tools that can be used for project monitoring. - Discuss how to integrate the results of project initiatives into the performance monitoring matrix.
Time required	Two hours
Teaching resources	- Performance indicators dashboard of the Three-year Plan - Interactive discussion on how to integrate monitoring data
Read more:	<i>Linee guida per il monitoraggio delle Azioni prioritarie del Piano triennale di contrasto allo sfruttamento lavorativo in agricoltura e al caporalato</i> (ILO, Rome 2021).

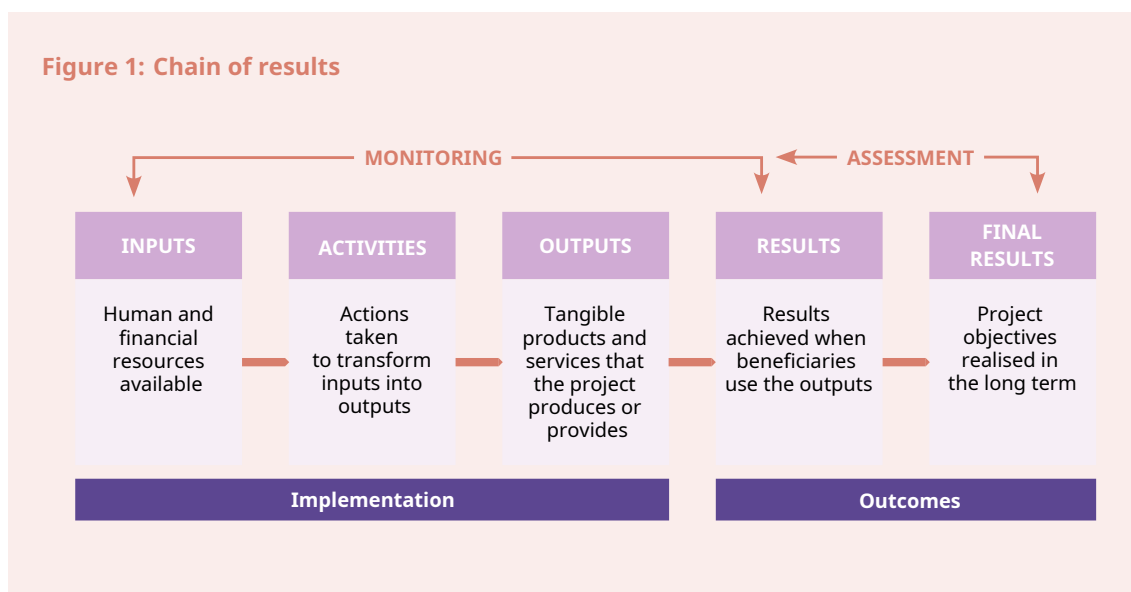
Introduction

This module aims to analyse: (i) the tools that MLPS and Regional officials have at their disposal to monitor the performance of the projects being implemented and (ii) to include the project contributions, funded by the MLPS and other Ministries, in the performance monitoring system of the Three-year Plan to prevent and tackle labour exploitation.

The project performance

The monitoring of project performance begins with the causal chain of project results outlining the theory of change (See Figure 1) and the logical framework illustrating the sequence of how activities achieve results (immediate and long-term) by outlining the indicators that will be used to measure the implementation of activities, the achievement of results, and the realisation of specific objectives.

The logical framework is the tool that guides both the continuous monitoring of the project, carried out by project management during implementation, and the external project monitoring. Whereas internal project monitoring is carried out continuously along the logical framework chain, third-party monitoring usually focuses on project outputs and outcomes by analysing indicator trends.



The main difficulties in monitoring projects financed by public institutions concern (i) the uniformity of outcome indicators in terms of definition, disaggregation, baselines, and sources so that data can be aggregated and evaluated as a whole; and (ii) the analysis of data to understand whether interventions are producing the expected results, whether there are overlaps or uncovered areas.

Project monitoring tools

Third-party monitoring of project performance mainly uses three tools: (i) analysis of periodic reports sent by the project with data on the status of indicators during the reporting period; (ii) field visits by third-party representatives to collect primary data on project

implementation and verification of activities carried out; and (iii) evaluation of performance at the end of the project — based on both the value of indicators and other information collected during normal monitoring activities.

These reports are the primary source of information on project performance. They are usually compiled based on uniform formats and survey forms that allow the consolidation of information from the various projects into a single monitoring matrix that assesses how well they contribute to the set policy objectives. The information in the monitoring reports must be valid, reliable, timely, and comparable to monitor project progress over time effectively.

The second tool used for project monitoring is monitoring missions. These are aimed at gathering further information on the progress of the project for what is reported in the monitoring sheets (e.g. through interviews with the beneficiaries, it is possible to establish the level of satisfaction with the services rendered; interviews with local authorities allow the gathering of information on the progress of activities, the involvement of partners, the relevance of the intervention to local needs); to verify that activities are taking place as planned, and to identify critical points and good practices.

The last phase of project monitoring is the evaluation of overall performance, which focuses on the quality of implementation and the results achieved. This type of evaluation is based on analytical and interpretative activities aimed at expressing a value judgement on the intervention, comparing the results achieved with the expected results, the time of implementation, the costs incurred and the quality of performance.

The regions are responsible for coordinating the interventions implemented on their territory and, therefore, also for monitoring the results (accountability). Hence the need to set up a single system that brings together the contributions of all projects to the achievement of regional (but also national) policy objectives. It also helps the coordination of interventions.

Monitoring project performance follows the same steps as monitoring institutional initiatives and includes five main actions (Tabella 1).

Periodic monitoring reports

Monitoring missions

Performance evaluation

Regional and national policy objectives

Tabella 1: Monitoring system

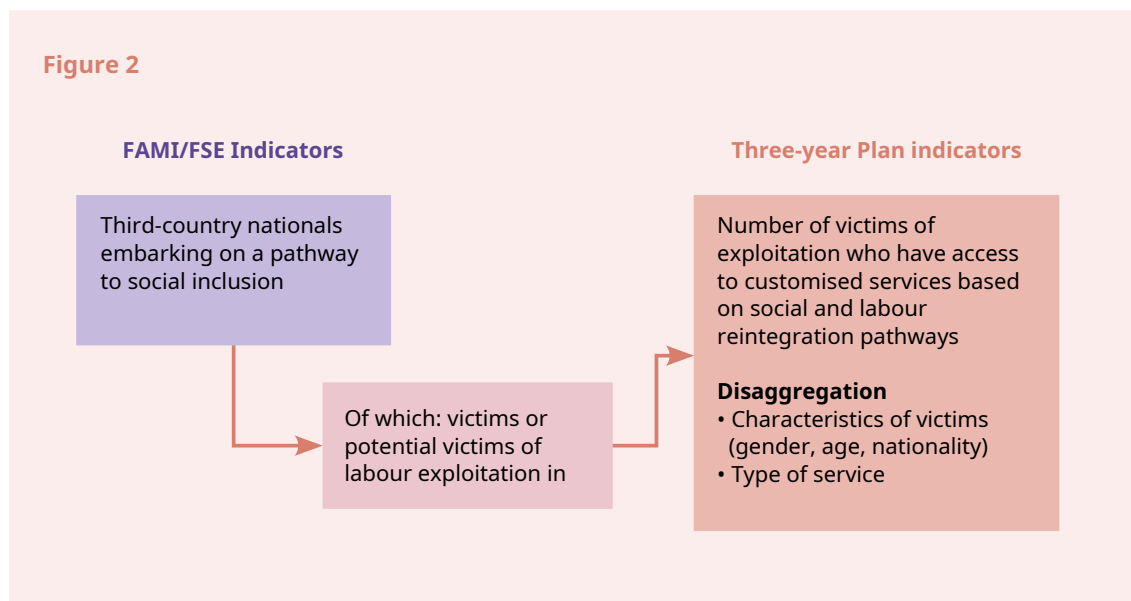
Institutional interventions	Project interventions
1. Identifying interventions that — directly or indirectly — contribute to preventing and tackling labour exploitation	1. Identifying projects that — directly or indirectly — contribute to preventing and tackling labour exploitation
2. Defining the objectives of each intervention	2. Analysing the objectives and indicators of each intervention
3. Developing result and implementation indicators (matrix)	3. Matching project outcome indicators with the outcome indicators of regional initiatives in the matrix
4. Organising data collection of indicators	4. Updating monitoring data periodically
5. Analysing data and preparing monitoring (reporting) reports	5. Analysing data and preparing monitoring (reporting) reports

In general, we start by auditing all projects, the activities of which contribute directly or indirectly to preventing and tackling labour exploitation.

Next, the project objectives, expected results and indicators established during the formulation are analysed. Data are collected through the reports and monitoring visits to populate the monitoring matrix and then move on to analysis.

The connection between the project and regional initiative indicators must be based on the respective elements of the result indicators (definition, calculation method, baseline, disaggregation, periodicity) and, thus, on understanding what the respective indicators measure. Particular attention must be paid to the definitions of the ultimate beneficiaries (workers, third-country nationals, victims, or potential victims of exploitation) to obtain homogeneous indicator measures. For instance, not all third-country residents are agricultural workers or victims or potential victims of exploitation (Figure 2).

Figure 2



To simplify the collection and analysis of the contributions of the project activities, the MLPS is formulating a battery of common indicators that meet both the requirements of the funding sources (European Structural Funds) and the indicators of the Three-Year Plan. The regions should consider the dashboard of indicators of the Priority actions (monitoring matrix, reported in Box 1) to plan interventions to prevent and tackle labour exploitation.

Box 1: Three-year Plan indicator dashboard

1. Value added to agricultural producers for processed food products
2. Agricultural enterprises registered in the Network of Quality Work in Agriculture
3. Italian and foreign agricultural workers employed illegally
4. Percentage of agricultural workers using Public Employment Centres (CPI)
5. The proportion of agricultural workers with access to decent housing
6. Percentage of agricultural workers with access to dedicated transport
7. The proportion of consumers made aware of ethical products
8. Percentage of agricultural enterprises inspected
9. Percentage of agricultural workers protected
10. Number of identified victims of labour exploitation in agriculture
11. Number of victims using protection services assistance
12. Number of victims reintegrated into the labour market

It follows from the above that:

- For some indicators in the three-year plan, projects contribute indirectly. For example, a project that provides technical assistance to an Employment Centre to develop and manage reservation lists for agricultural workers contributes to improving the effectiveness of employment services, which in turn is measured by the indicator “Number of jobseekers in the agricultural sector using Employment Centre out of the total number of job seekers in the sector”. If the project is effective (and this can be measured through the project-specific monitoring indicators), this should translate into an increase in the Plan’s indicator.
- For many of the plan’s outcome indicators, ongoing projects contribute directly and measurably. For example, a project offering transport services to agricultural workers contribute directly to the Plan’s indicator “Number of agricultural workers benefiting from dedicated transport services (public, private, employers, bilateral bodies)”.

The discussion on the contribution of the projects to the results of the Three-year Plan emphasised how the projects being implemented highlight the issues of housing, transport, and labour intermediation in the agricultural sector, but also the promotion of the Network of Quality Work in Agriculture, victim protection and assistance, and transparency in the agricultural supply chain.

Contribution of projects to regional and national policy objectives

Example of Piedmont Region, “BuonaTerra” project

In the Piedmont region, for example, the FAMI-funded ‘BuonaTerra’ project aims to “improve the living and working conditions of seasonal agricultural workers employed in fruit picking (...) to create a new model of coexistence (...)”. The project actions and the respective indicators are reported in Box 1. Table 2 shows the connection with the Region’s monitoring indicators.

Table 2: Result indicators of “BuonaTerra” project: Piedmont Region

Action	Indicators
Housing support	Number of seasonal workers accommodated (by type of accommodation)
Prevention and assistance of exploitative situations	- Number of regular seasonal workers (emerged) - Number of victims accessing protection and assistance services (referred to as anti-trafficking services) - Number of enterprises with supply chain agreements and number of workers covered
Agricoltura sociale, etica e di qualità	Number of enterprises registered in the Network of quality work in agriculture (with incentives)
Supporting employability and matching supply and demand	Number of seasonal workers sent to work via Employment centres (of which via lists, platform, employment services)

Table 3: Link between monitoring indicators: Piedmont Region

Initiative of the Piedmont Region	Indicators	Initiative of the Piedmont Region	Indicators
RL No. 12/2016 Temporary accommodation of seasonal agricultural workers	Number of seasonal workers accommodated (by type of accommodation)	"BuonaTerra" project	- Number of seasonal workers accommodated (by type of accommodation) - Number of regular seasonal workers (emerged) - Number of victims accessing protection and assistance services (referred to as anti-trafficking services) - Number of enterprises with supply chain agreements and number of workers covered - Number of enterprises registered in the Network of quality work in agriculture (with incentives) - Number of seasonal workers sent to work via Employment centres (of which via lists, platform, employment services)

Once the list of all project result indicators has been obtained, connecting with the battery of indicators established for institutional initiatives is necessary. In the example of the Piedmont Region, the connection is made on the indicator concerning the number of workers housed (in decent accommodation), which is also the result indicator of Regional Law no. 12 of 2016 (Temporary accommodation of seasonal agricultural workers). As a cascade, the total value of the indicator achieved in Piedmont (Regional Law plus the activities of the "BuonaTerra" project) will — together with the other interventions planned in the other Regions — populate the monitoring matrix of the Three-Year Plan, Action 5 (housing), as indicated in Table 4.

Table 4: Link between monitoring indicators and the Three-year Plan

Initiative in the Piedmont Region	Indicators	Priority action of the Plan	Indicators
RL No. 12/2016 Temporary accommodation of seasonal agricultural workers	Number of seasonal workers accommodated (by type of accommodation)	Action 5 Housing	Percentage of agricultural workers with access to decent housing
"BuonaTerra" project			

Example Campania Region ‘Di.Agr. AMI.’ and ‘P.I.U.SU.PR.EME.’ projects

The objective of the projects was (i) to implement actions to foster social and labour integration and to tackle labour exploitation and capitalisation and (ii) to complement and strengthen already existing initiatives on prevention, emerging and tackling irregular work.

The projects included the following activities:

- **Support measures for regular labour reintegration:** (i) skills assessment and accompaniment to the validation of qualifications; (ii) linguistic and civic integration paths; (iii) vocational training and skills development; (iv) labour market information and guidance; (v) work experience and labour integration.
- **Housing support:** experimentation with shared housing solutions and granting rental subsidies.
- **Labour and social reintegration:** identified action plan, active job search, vocational training, labour supply and demand matching tools, traineeships.

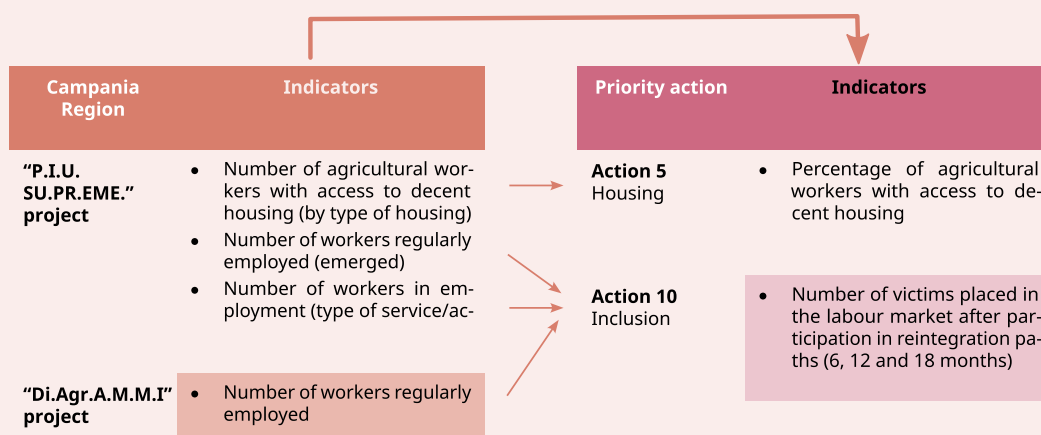
Table 5: Result indicators, Campania Region

Action	Indicators
• Support measures for regular employment	• Number of workers regularly employed
• Housing support	• Number of agricultural workers with access to decent housing (by type of housing)
• Labour and social reintegration	• Number of workers regularly employed (emerged) • Number of workers initiated to work (type of service/active measure)

Table 6: Project monitoring indicators Campania Region

Iniziativa	Indicators
“Di.Agr.A.M.M.I” project	• Number of workers regularly employed
“P.I.U. SU.PR.EME.” project	• Number of agricultural workers with access to decent housing (by type of housing) • Number of workers regularly employed (emerged) • Number of workers initiated at work (type of service/active measure)

Table 7: Linking monitoring indicators: Regions and Three-year Plan





Module B7

Collection and analysis of monitoring data

Collection and analysis of monitoring data

Learning objective	At the end of the learning module, participants will have: • Examined the techniques to analyse performance data and prepare monitoring reports.
Time required	Two hours
Teaching resources	• Plan monitoring matrix • Data collection matrix on the Plan implementation
Read more:	• <i>Linee guida per il monitoraggio delle Azioni prioritarie del Piano triennale di contrasto allo sfruttamento lavorativo in agricoltura e al caporalato</i> (ILO, Rome 2021).

Introduction

This module aims to provide participants with practical tools for analysing performance data and preparing monitoring reports. Analysis of the plan's monitoring data requires that data first be: (i) collected from all actors responsible for implementation; (ii) verified and collated ("cleaned"); and (iii) organised into descriptive statistics for analysis. Each of these steps presents complexities that must be addressed to ensure that the data are reliable and accurately reflect the progress of the implementation of the priority actions and the Plan as a whole.

While Module 4 (Performance Monitoring of the Three-year Plan) discusses data collection in terms of "what" to measure (definition and measurement of indicators), in this module, data collection is discussed in terms of 'who' collects information on indicators and "how", i.e., the methods that can be used to ensure that all information on current initiatives is channelled to a single point for performance analysis.

Data collection

The previous training modules emphasized some relevant points for data collection and analysis.

Firstly, most of the Plan's **indicators are quantitative (and thus objective)** result indicators. The few implementation indicators included in the monitoring matrix were developed to verify the implementation of actions considered instrumental to the achievement of specific outcomes (e.g., the indicators related to the crop calendar of Action 1, the institutional information campaign of Action 7 and the mapping of informal settlements of Action 5). The indicators' data must also be collected, verified, and analysed. Still, the data of the result indicators is the most important for the monitoring system. The Plan contains only a few qualitative indicators, which have already been transformed into quantitative indicators to facilitate analysis (e.g., the indicator on consumer awareness of ethical products in Action 7 concerns individual attitudes, but the final measurement is made on the percentage of consumers sensitised).

Secondly, and as far as possible, the indicators were created on **administrative data sources** and thus on information that is (or should be) available. For example, the indicator on Public Employment Centres (CPI) with fixed and mobile branches specialised in the agricultural sector should be available to ANPAL (National Agency for Active Employment Policies), and — if not — ANPAL should request information from all CPI.

Thirdly, it was clarified — during the training on the contribution of the project activities to the Plan (Module 6) — **how the different actors of the plan contribute (directly or indirectly, exclusively or jointly) to the achievement of the outcomes**. In particular, a distinction was made between (i) indicators to which national institutions (national partner institutions of the plan) are directly responsible, Figure 1, Panel A; (ii) indicators to which regional institutions contribute (directly or through project implementation), Panel B; and (iii) indicators to which project activities contribute (directly or indirectly), Panel C.

Figure 1: Contributions to the Three-year Plan

Panel A: National Institutions

Ministry of the Interior
Decreto Flussi (Flows Decree)
2022: 42,000 units for
seasonal work

Outcome 4.1. Planning of agricultural
labour needs, including the definition of
legal entry quotas for foreign workers

Regular entry quotas available
out of total applications
received (annual basis)

Panel B: Contribution of regional institutions

Piedmont Region
Regional Law 2021 for the
allocation of contributions to
municipalities (...) for projects
aimed at the accommodation
of seasonal agricultural
workers

Outcome 5.1. Definition of quality criteria
for housing solutions for the design,
management and delivery of services at
the local level

Number of agricultural
workers with access to
emergency accommodation in
line with minimum standards

Panel C: Project contribution

PROG-2970
Action: "Prevention of and
emergence from labour
exploitation"
Activities: "Experimentation of
support systems for
seasonal workers to facilitate
travel
to and from the workplace"

Result 6.4. Improvement of the quantity
and quality of dedicated transport
services, including through the
implementation of rural development

Number of agricultural workers
benefiting from dedicated
transport services (public,
private, employers, bilateral
Bodies)

Project financed by FAMI (Asylum
Migration and Integration Fund)
funds with two Italian regions as
beneficiaries

Based on the above and the basis of the Plan's governance structure (multi-actor and multi-level), data collection will have to take place on several levels:

First level

The first level concerns collecting data on outcome indicators that measure actions under the direct responsibility of **national institutions** (e.g., Ministry of the Interior, Ministry of Agriculture). For example, data for the indicators ‘Number of regular entry quotas out of total applications’ and ‘Number of agricultural vacancies filled by the Employment Centre (CPI) must be collected by the Ministry of the Interior and ANPAL, respectively. For this first type of indicators, the responsibility for data collection, verification and transmission to the Ministry of Labour lies with the coordinators of the thematic groups. As previously mentioned, it would be useful for **each coordinator to ‘unpack’ the indicators** under their responsibility to understand how and when to collect the necessary information.

Second level

The second level concerns data collection on actions taken by the **regions** to combat labour exploitation and protect victims. In this case the information to be collected concerns initiatives implemented by the regions directly (e.g., a regional law offering contributions to employers for the reception of seasonal workers) or through the funding of specific project initiatives (e.g., the construction and management of a reception centre for seasonal migrant workers). Recent project initiatives financed by FAMI and ESF (European Social Fund) (Su.pre.me and Piu Su.Pre.Me) fall under the third level (see below).

Data collection at this level is the most critical because it requires the regions to make an effort to collect, verify and transmit data to a single collection point (the Ministry of Labour) to feed the data into the plan’s overall performance monitoring matrix.

Third level

The third level concerns data collection on ongoing and future project initiatives for the local implementation of actions against labour exploitation and victim protection. Data collection at this level is more straightforward and implemented through (i) the periodic monitoring reports compiled by the same projects and (ii) the monitoring missions carried out by the funding body (for ongoing projects, the MLPS and the Ministry of Interior). The only aspect that could create difficulties is linking the indicators developed for ESF and FAMI-funded initiatives and the plan’s indicators.

Fourth level

The fourth level of data collection concerns **context indicators**, on the one hand, and the collection of other information that may be useful for the triangulation of outcome indicator data (see also the section on the analysis). The context data collection requires reference to the statistical and administrative data of the indicated sources (Table 1). The only aspect to pay attention to is a possible change of methodology, which could jeopardise the comparability of the data.

When we speak of **triangulation data**, we refer to information collected by various bodies/organisations for purposes other than the plan (and which are not part of the monitoring system) but which, by their nature, can help analyse the plan’s monitoring data. For example, ISTAT (Italian Institute of Statistics) publishes thematic reports (poverty, work, youth, foreigners) that can offer valuable benchmarks for monitoring data analysis.

Table 1: Data collection, context indicators

Indicator	Baseline	2019	2020	Notes	Source
Workers in the agricultural sector	2018: 872,000 unity	844,000 unity	843,000 unity		ISTAT: Trends in the agricultural economy
Agricultural production value	2018: €59.3 billion	€61.6 billion	€59.6 billion		ISTAT: Trends in the agricultural economy
Shadow economy in agriculture	2017: 16.9 per cent value-added	17.3 per cent value-added			ISTAT: The unobserved economy in the national accounts
Percentage of agricultural employees by region	2018: Apulia, 16.8 per cent Sicily 14.1 per cent Calabria 9.9 per cent Emilia-Romagna 9.5 per cent Campania 6.4 per cent	Apulia, 16.2 per cent Sicily 13.9 per cent Calabria 9.3 per cent Emilia-Romagna 9.4 per cent Campania 6.5 per cent	Apulia, 16.1 per cent Sicily 14.1 per cent Calabria 9.2 per cent Emilia-Romagna 9.3 per cent Campania 6.6 per cent	Between 2019 and 2020, the number of employees in agriculture decreased by 0.7 per cent, with significant declines recorded in Trentino (-5.1 per cent) and Friuli Venezia Giulia (-2.2 per cent)	INPS: Agricultural world
Percentage of Italian and foreign employees in agriculture	2018: 6.4 per cent of foreigners 3.5 per cent of Italians	6.6 per cent of foreigners 3.5 per cent of Italians	7.1 per cent of foreigners 3.6 per cent of Italians	Data for 2020 are derived from ISTAT, employment by macro-sectors and citizenship.	MLPS, DG Immigration: IX Annual report: Foreigners in the labour market in Italy, 2019
Irregular labour rate, employees in agriculture	2018: 34.9 per cent	34.2 per cent	N/A		ISTAT: Regular, irregular employment and population, 2019

Data cleaning

Before data can become the subject of analysis, it must be checked for errors (transcription, transmission, or other). In the first instance, the responsibility for verifying that the data collected on the monitoring indicators is correct lies with the institutions and organisations that do the collecting (i.e., national institutions, regions, project initiative management bodies) and, in the second instance, with the coordinators of the thematic groups. The final responsibility for the correctness and validity of the data lies with the Ministry of Labour and Social Policy as the institution that coordinates the implementation of the plan and is responsible for monitoring.

Verification

It is based on (i) screening the data for missing data, nominal values, or counterintuitive patterns and (ii) deciding what to do once an error or outlier value has been identified. For example, a project initiative reporting the employment of 10,000 potential victims of exploitation in labour reintegration pathways, when the data reported 10 in previous years, is an outlier value that needs to be verified. Another example of verification concerns the connection between different indicators (ESF/FAMI and Plan). For instance, if a region transmits the figure that 500 third-country nationals had access to social housing during the reference period, the data link requires that this be disaggregated by: (i) labour market status (worker in agriculture) of the beneficiaries and/or (ii) status as a victim or potential victim of exploitation.

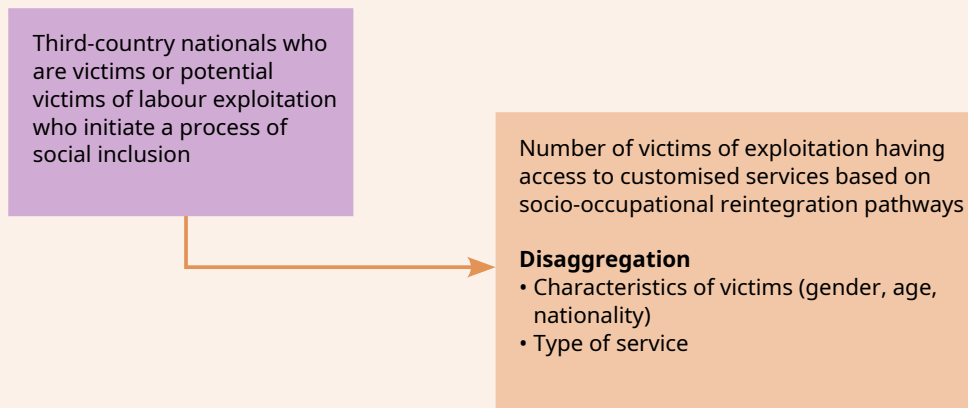
Once the error/anomaly has been identified, it is possible to decide to: (i) leave the erroneous or anomalous data without correction (which may be a strategy if the numbers are large and the error does not have much weight on the final count); (ii) **correct/re-measure the data** (going back to the source and asking for additional information); (iii) not use the data (which may give rise to bias). In the latter case, it should be reported that some data are “excluded from the analysis”.

Suppose there is no information/data for a specific indicator. In that case, the matrix cell remains zero (initial value in the monitoring table). In the case of the plan's monitoring system, it will not be possible to correct missing values with the techniques usually used for missing values in a primary data set.

Linkage

The data linking verifies the overlapping of the monitoring data of the project initiatives (ESF and FAMI) and the result indicators of the plan. An indicator defined as “**Third-country nationals who use the legal services provided by the project**” cannot be used to calculate the Plan's indicators unless it is a disaggregation of the data reporting victims or potential victims of exploitation and others. In the following example, however, the indicator is immediately superimposable through the disaggregation provided by the Plan's indicator.

Figure 2: Link between FAMI/ESF indicators and Plan indicators



There are four types of analysis: descriptive, diagnostic, predictive and prescriptive. For performance monitoring, mainly descriptive analysis is used, enriched by some elements of diagnostic analysis.

It is used to describe the general characteristics of a data set and includes:

1. The description and shape of the distribution (frequency).
2. The central position or trend (mean, median).
3. Variability or dispersion.

The purpose of descriptive analysis is to identify through the organisation of data in statistical tables or graphs patterns, relationships and connections that help explain the meaning of the data.

The analysis of monitoring data is carried out at different levels and in further steps. At the Priority action level (and thus under the responsibility of the Thematic group coordinators), the analysis concerns the individual indicator, then the set of indicators for a particular result, and finally, the set of outcomes of the Action.

At the level of the three-year Plan, the analysis considers less the data for individual indicators and more the set of result indicators and critical indicators.

The **first step** of the analysis is simply comparing the individual result data concerning the baseline and the target set. This task falls to the coordinator of the thematic group since this type of analysis is primarily a tool for managing initiatives. For example, for Action 3, a Network of quality agricultural work:

Analysis

Descriptive analysis

Data analysis techniques

Indicator	Baseline	2021	Target
Number of enterprises involved in agricultural activity registered in the Network	3,900 enterprises enrolled in the Network as of February 2020, compared to 187,600 agricultural enterprises with employees surveyed by INPS (National social security institute)	5,166 eligible farms at the end of 2021 out of a total of 183,057 registered farms	By 2022, at least 10,000 agricultural enterprises with employees will be registered in the Network

This simple comparison shows that registered companies are increasing (+32 per cent in one year). Still, to reach the target set for 2022, the number of registered companies would have to double in the following year.

A **second step** — when data are available — concerns the analysis of the evolution of the individual indicator over time (several years). This type of analysis makes it possible to identify whether the progression of the indicator is linear or not and to look for possible explanations for the erratic trend.

The **third step** deals with the analysis of the disaggregation provided by the indicator. The Plan's main disaggregation address individuals (gender, age, nationality); territories (regions); and types of services. For example, Action 9 (Protection and Assistance) provides for the following disaggregation:

Indicator	Baseline	2021	Target
Number of victims of labour exploitation in agriculture identified and supported by protection and assistance services	In the first half of 2019, 33 victims of labour exploitation were taken in by the national anti-trafficking system	In 2020 INL reported identifying 1,104 victims of exploitation, while the Guardia di Finanza (Italian Finance Police) — in May 2020–June 2021 — identified 1,370 victims	By 2022, identified victims of labour exploitation will have access to customised protection and support services
Disaggregation			
Characteristics of victims (gender, age, nationality)			

Once disaggregated and organised into descriptive statistics, the indicator data can indicate a higher frequency for men than for women, for young people up to 34 years of age than for adults, and third-country nationals than for Italians and EU citizens. Analysis of the disaggregated indicator over time finally allows one to understand whether the trend continues (young men, third-country nationals) or whether there are changes.

Outcome	Indicators
4.1 Planning of agricultural labour needs, including the definition of legal entry quotas for foreign workers	- Data and information from the information system are used to quantify and qualify the labour needs of the agricultural sector, including flows of foreign workers - Experimentation of a way of involving employers' associations in the management of entry quotas - The quotas of the Decreto Flussi (Flow decree) cover 45 per cent of the requests received

Once the analysis for each indicator has been completed, it is necessary to move on to the study of the set of indicators for each outcome. For Action 4A (Workforce flow planning), for example, the indicator data could show that improvements are being made regarding coverage of the flow decree and experimentation with employers. At the same time, no changes are being measured for the use of the information system.

Therefore, the indication from the monitoring would be the need to accelerate actions to promote using the information system for planning.

The last level of analysis is that of the key indicators, which are result indicators already included in the monitoring matrix but which, due to their nature, are suitable for measuring the action as a whole. For example, for Action 10, the key indicator is 'Number of victims of labour exploitation in agriculture reintegrated into the labour market', so it is sufficient to look at the analysis already carried out for the individual figure to understand the trend of the Action (which could show, for example, a higher frequency for women, over 34 years old and EU citizens).

Triangulation is comparing data emerging from monitoring with other data from other sources to corroborate the outcomes obtained and compensate for any data limitations. This technique mainly validates or refutes hypotheses developed during data interpretation. Suppose, for example, that the data on the identification of victims of exploitation show an increase in Italian workers being exploited compared to foreigners. One possible explanation is that this is due to the increased number of Italian workers in the agricultural field. Triangulation with the data on Italian and foreign employees in the sector shows, however, that over the period 2020-2021, there was an increase in the percentage of foreigners employed in agriculture, while the percentage of Italians remained unchanged. Ho-

Triangulation

wever, these percentage data could be influenced by an increase/-decrease in the reference population; therefore, the triangulation requires that this element be verified. Suppose the data continue to indicate that the increase in Italian victims is unrelated to the rise in Italian workers in the sector. The hypothesis is false in that case, and another explanation must be found.

Questions that may be useful for triangulation are: (i) is the hypothesis confirmed/confirmed by the triangulation data? (ii) is the data used for triangulation reliable, or does it suffer from bias? (iii) are there other possible explanations not foreseen in the original hypothesis? and (iv) Are we convinced of the conclusions reached?

The Three-year Plan

The techniques are the same at the level of the overall analysis of the three-year Plan performance. Suppose the task of collecting data from the regions and projects is entrusted to the Ministry of Labour. In that case, the latter must first proceed to the data entry indicator by the indicator on the basis already prepared by the group coordinators and then proceed to an analysis by a single (cumulative) indicator and then by a set of indicators, by priority Action and crucial indicators. At the three-year Plan level, however, the focus is more on the Actions and the Plan as a whole.

Monitoring reports

To be entirely usable by all, the analysis of monitoring data should be organised in a concise monitoring report that presents the main outcomes achieved, identifies critical issues and proposes corrective actions, ideally annually. The content of the report should focus on three main topics, namely: (i) the level of implementation of the Three-year Plan; (ii) strengths and weaknesses; (iii) corrective actions. These reports are primarily intended to support effective and efficient management of the plan's initiatives.

The monitoring reports in the Three-year Plan document are more structured and have different timeframes (18 months after approval and in 2022, at the end of the implementation period). These reports (see Box 1) are built on the monitoring data collected, verified and analysed annually but also look at other aspects, such as context, governance, coordination and use of financial resources.

Table 2: Example of the structure of the performance assessment report

Table of contents	Notes
Introduction	This part of the report summarises the conclusions of the analysis of the monitoring data and the main recommendations for the future implementation of interventions.
1. The context	This section contains the analysis of the context indicators and their performance against the baseline.
2. Outcomes	This chapter of the report contains the analysis of the result indicators of each priority Action and the evaluation of the effectiveness, efficiency and timeliness of the actions implemented. Particular attention should be given to checking the indicators' progress towards the target reached at the end of the plan.
3. Criticalities	This chapter aims to summarise the critical issues that emerge from the monitoring data analysis and propose solutions for overcoming them.
4. Coordination and governance	This section analyses the functioning of the plan's governance system, identifies any critical issues, and proposes possible solutions.
5. Monitoring sSystem	This part of the report examines the effectiveness of the monitoring processes of the thematic working group coordinators and accounts for the adjustments implemented to improve the interventions outcomes.
6. Conclusions	The last part of the report details the main conclusions of the analysis, summarises the progress and critical issues that emerged during the Plan's implementation, and presents proposals for the future planning, performance, and monitoring of interventions.



Module B8

Ex-post evaluation of interventions to tackle labour exploitation

Ex-post evaluation of interventions to tackle labour exploitation

Learning objectives	At the end of the learning module, participants will have: • Examined methods of the ex-post evaluation of public policy interventions to tackle labour exploitation. • Analysed the use of evaluation methods for the priority Actions of the Three-year Plan.
Time required	Two hours
Teaching resources	• Interactive session with questions and answers on possible methods to evaluate the interventions of the Priority actions
Read more:	• <i>Guida alle metodologie di valutazione ex post degli effetti delle politiche di contrasto allo sfruttamento lavorativo</i> (ILO, Rome 2020).

Introduction

The last module of the training programme on 'Monitoring the performance of actions to prevent and tackle labour exploitation in agriculture' aims to examine the primary ex-post evaluation methods regarding the impact of public policy interventions, the scope, and the limits of application. The aim is to offer insights into the evaluation of the interventions of the Three-year Plan to tackle labour exploitation in agriculture.

Whereas in the past, evaluations of policy interventions were predominantly focused on procedural aspects, in the last decade, the need has emerged to evaluate ex-post the expected or unexpected positive and negative effects of interventions to improve the effectiveness of policies and their ability to produce measurable outcomes (effects or impact evaluation).

There are different approaches and investigation methods for evaluating the effects of public policy interventions, each with a specific scope and various limitations. What is the best approach to evaluate a public policy intervention depends, firstly, on the type of intervention implemented (one-off, well-defined measure over time, or more structured interventions) and, secondly, on the vital question of the evaluation, namely 'What do you want to know or measure'?

Ex-post evaluation

Evaluation is **a process that systematically checks all elements of a policy or programme intervention** (e.g., planning, implementation and outcomes achieved) against objective criteria to determine its overall impact. The aim is to provide evidence-based information to identify ways to achieve better outcomes.

Performance evaluation

Performance evaluation **focuses on the quality of implementation and the outcomes achieved**. This type of evaluation concerns the outcomes achieved in the short and medium term (e.g., the number of victims of labour exploitation reintegrated into employment), as well as the relevance (appropriateness of the objectives to the problems intended to be solved), effectiveness (the ability of the outcomes to contribute to the achievement of the aim), and efficiency (ability to achieve the intended outcomes at a reasonable cost) of the interventions.

This type of evaluation is based on analytical and interpretative activities aimed at expressing a value judgement on the intervention, comparing the outcomes obtained with the expected outcomes, the time taken to implement it, the costs incurred and the quality of performance. The starting point of this type of evaluation is the **information collected by the monitoring system**, intending to verify whether the observed changes outcome from the implemented interventions or other contextual factors.

Impact evaluation

The purpose of impact evaluation of a public policy intervention is to **verify whether and to what extent the adopted policies have produced the desired changes**. The main difficulty in this type of evaluation is distinguishing which part of the observed change is directly attributable to the public intervention and how much is due to the other factors influencing it.

The various approaches can be used to measure impact; the choice depends on the intervention to be evaluated and the specific evaluation questions to be answered. The most established methods are the **counterfactual approach** — which focuses on the difference between what has been achieved with the intervention and what would have happened without the intervention in the hypothetical ('counterfactual') situation in which the intervention had not taken place; and the **theory-based approach** — which conceptualises the intervention in terms of a theory that explains its functioning and the mechanisms that led to the observed outcome.

The purpose of the counterfactual evaluation is to test the ability of a policy intervention to change the behaviour or conditions of a particular target group in the desired direction. The effect is defined as the difference between what happened **after** the implementation of a policy (factual situation) and what would have happened if that policy had not been implemented (counterfactual situation). This approach is particularly suitable for well-circumscribed interventions, applied uniformly in all cases and to all recipients/users, with causal chains linking intervention to effect linearly.

Counterfactual evaluation

For example, the counterfactual evaluation of an intervention that aims to reduce the exploitation of workers in the agricultural sector tends to measure the number of workers who are no longer in an exploitative situation following the adoption of the intervention against the number of the same workers who would no longer be in an exploitative condition if the intervention had not been implemented. The difference between the two values is the net impact of the intervention.

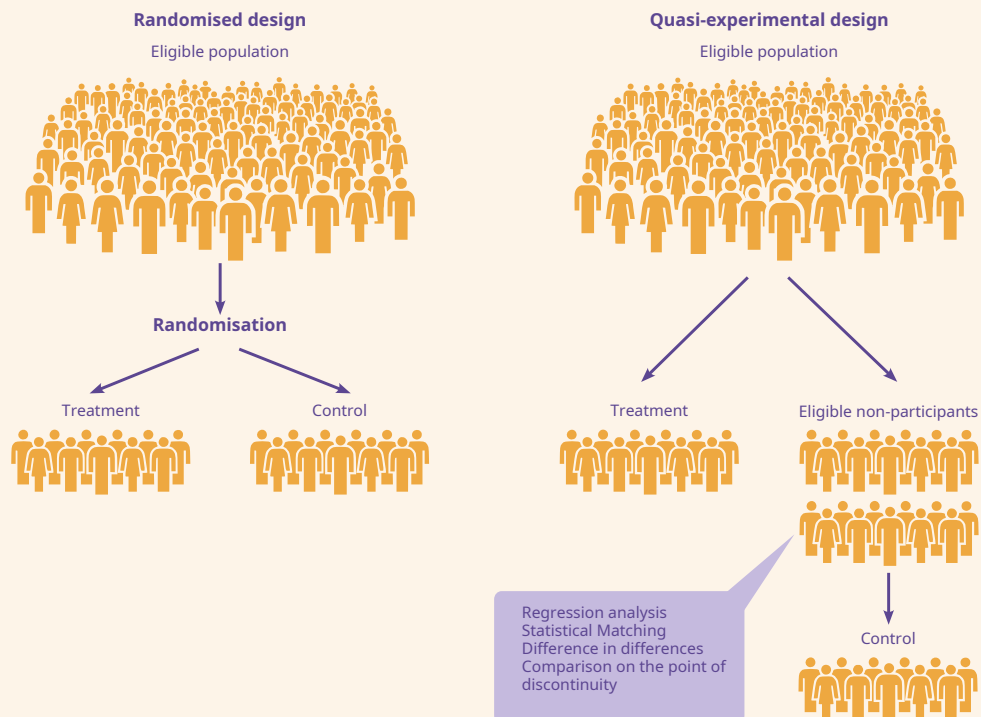
The main difficulty with this approach is estimating the second term in the equation (how many of the same workers would have emerged from an exploitative situation without the intervention), which cannot be directly observed. Hence the need to produce estimates that reconstruct the counterfactual situation with observable data, which can approximate what would have happened to the beneficiaries in the absence of the intervention. These estimates are made by creating 'control groups' that are, to all intents and purposes, identical to the group being evaluate, i.e.:

1. The two groups are identical in terms of observable variables (gender, age group, level of education) and unobservable variables (preferences, motivations, and interests).
2. The two groups react in the same way to the intervention. It means that the intervention is likely to have the same impact (in terms of increasing or decreasing the variable of interest) for both groups.
3. Treatment and control groups are exposed similarly to any other factors other than the intervention to evaluate.

If the two groups differ substantially, a selection bias occurs: the observed outcomes may be due to the differences between the two groups rather than to the intervention implemented.

In its quantitative version, the counterfactual approach uses **experimental and non-experimental methods**.

Figure 1: Randomised experimental and quasi-experimental designs



Source: ILO, *Monitoring and evaluation of youth employment programmes* (Geneva, 2003).

Experimental methods

The experimental method stems from clinical trials. Patients suffering from a disease are divided into two groups by drawing lots (randomisation): the experimental or 'treatment' group is given the drug; the other group, 'control', is an inert substance. The course of the disease observed in the control group will be very similar to the disease course would have had in the experimental group in the absence of the drug.

The randomised experimental design offers the highest internal validity for evaluating an intervention but is often unusable. For example, a randomised experimental design cannot be used when: (i) the intervention has already been started, and other methods have already selected participants; (ii) there are sufficient resources for everyone, and it would be unethical to deny a service; or (iii) the intervention concerns a limited number of people with unique characteristics.

The main problem of the experimental method is the **maintenance of the integrity of the experiment**, i.e., the clear separation of the control and treatment group for the entire duration of the experiment. On the one hand, there is the problem of **non-participation**

and incomplete participation (no-shows and drop-outs) on the part of those assigned to the treatment group; on the other hand, there is the problem of **crossovers**, i.e., those individuals assigned to the control group who manage to benefit equally from the intervention. These phenomena are the primary source of bias in the estimates that make comparisons between those who participate and those who do not participate impossible.

Randomisation reduces the applicability of this approach to those relatively rare situations in which this method is not hampered by ethical or political reasons or by difficulties in obtaining the cooperation of service providers. The applicability of the experimental method is also limited to interventions with partial coverage. All interventions of a universal nature (such as primary education, environmental protection interventions or the promotion of decent work) do not, by definition, lend themselves to identifying a control group and thus to randomisation.

Non-experimental (or quasi-experimental) methods are the most widespread. They are used in all situations where randomisation is not possible. Underlying the quasi-experimental procedures are the various statistical techniques used to construct a valid control group (difference-in-differences, regression analysis, statistical matching, comparison around the point of discontinuity and the use of instrumental variables).

Quasi-experimental methods

The difference-in-differences (DD) technique is based on the concept that the difference between the post-intervention outcomes of the participants and the control group includes both the 'true' treatment effect and the selection bias caused by the differences between the two groups. This bias can be partially corrected if data on the outcome variable can be obtained for both groups in at least two periods. Subtracting the difference between the two groups measured in an earlier period eliminates the part of the bias related to the different characteristics between the two groups that do not change over time.

Statistical matching creates ex-post a control group — consisting of untreated subjects — that is as similar as possible in terms of observable characteristics (sex, age level of education, employment) to the participants (for each person participating in the intervention, an untreated 'twin' is sought). Once the control group has been selected, the treatment effect is the difference between the averages of the outcome variable in the participant group and those in the matched non-treated group.

Statistical matching techniques (and regression techniques) are based on the "selection on observable variables", in which it is assumed that the variables influencing the selection process are observable and thus can be used to eliminate starting differences. When selection on observable variables is not possible, instrumental variables can be used, which break down the treatment variable into two parts: a part determined by the external factor outside the individual's sphere of control; and a part determined by the indi-

dual's decisions related to unobservable variables. Thus, only that part that does not depend on the unobservable variables is used as treatment (in econometrics, this external factor is referred to as the 'instrumental variable').

Theory-based evaluation

Theory-based evaluation methods are used for the causal attribution of effects through conceptualising the intervention based on a theory that identifies the mechanisms that led to a specific outcome. In this type of evaluation, it is assumed that interventions always have an effect (expected or unexpected, positive or negative) and that they always trigger mechanisms in the categories of actors involved.

Theory-based evaluation is suitable for investigating the relationships among different forms of empirical evidence, recreating the 'causal chain' operating in-depth and explaining the theory behind a correlation or variation in an indicator. Typical questions in theory-based evaluation are: What makes an intervention effective? What are the decisive actors' actions? What are the consequences of specific interactions and/or organisational arrangements? What actors implementing a given intervention need to adopt a specific behaviour? How is the behaviour of the recipients related to the actions taken?

A realistic approach

In the field of social sciences, theory-based evaluations mainly use a realist approach.

In The "Outcome = Mechanism + Context" pattern is crucial in a realistic evaluation. In this case, the term "theory" has a dual meaning and encompasses both scientific theories based on previous research, the outcomes available in the literature, and the ideas that actors (implementers and beneficiaries of the intervention) develop on the effectiveness of an intervention. All theories, regardless of origin, need to pass the scrutiny of empirical research; that is, be tested with the qualitative and/or quantitative methods most appropriate to the content of the theory. The evaluation based on a realist approach includes four steps.

1. Through **dialogue with the implementers**, the reviewer attempts to understand the nature of the intervention: What is the purpose of the intervention? What is the nature of the target population? In which contexts does the intervention take place?
2. The reviewer draws **a series of potential mini theories** correlating the various contexts of an intervention to the multiple mechanisms through which it might be implemented.
3. In the third phase, the reviewer undertakes an **outcome enquiry** of these mini theories. It involves the development of a quantitative and qualitative model for the intervention to evaluate the extent to which motivations and underlying mechanisms were activated by the different types of support provided.
4. The analysis of how **context-mechanism-outcome configurations** are implemented within an intervention to allows the evaluator to refine theories on what works, for whom and under which circumstances.

In the context of social change typical of public policies, actions are differentiated, strongly linked to the contexts in which they take place and complex (numerous actors, non-linear causal relationships, unclear interactions between elements). It is challenging to isolate the factors influencing the outcome and use them as homogeneous statistical units- not only because of the difference in contexts and mechanisms but also because of the diversity of outcomes according to the community.

The Pawson's model offers a practical outline of how to conduct a realist evaluation (Table 1).

Table 1: Outline of a realistic evaluation of the intervention's impact

Define the scope of the evaluation	Identify the question	• What is the nature and content of the intervention? • What are the circumstances and context? • What are the policy objectives? • What is the nature and form of its outcomes or impact? • Undertake explorative searches to inform discussion with decision-makers
	Clarify the purpose of the evaluation	• Theory integrity — does the intervention work as predicted? • Theory adjudication — which theories about the intervention seem to fit it best? • Comparison — how does the intervention work in different settings, for different groups? • Reality testing — how does policy intent of the intervention translate into practice?
	Find and articulate programme theories	• Search for relevant theories in the literature • Group, categorise or summarize theories emerging from the literature. • Design a theoretically based evaluative framework to be populated with evidence
Search for and appraise the evidence	Search for the evidence	• Define the sampling strategy. • Define search sources, terms, and methods to be used
	Appraise the evidence	• Test relevance — does the research address the theory under test? • The rigour of the tests — does the research support the conclusions drawn by the reviewers?

Followed ...

... follows

Extract and
synthesise
outcomes

Extract the results

- Develop a data collection system
- Extract data to populate the evaluative framework with evidence

Synthesize findings

- Compare outcomes with those in the literature (both positive and negative)
- Refine intervention theories in the light of empirical evidence gathered

Draw conclusions
and make
recommendations

- Involve decision-makers in review of findings
- Draft and test out recommendations and conclusions based on findings with key stakeholders
- Disseminate findings, conclusions, and recommendations

Source: Adaptation based on R. Pawson et al., *Realist synthesis: An introduction* (ESRC Research Methods Programme, University of Manchester, Paper 2/2004).

Evaluation of the Three-year Plan

The **ex-post evaluation** of the effects of the Three-year Plan, both as a whole and at the regional level, should consider three factors:

1. National and regional level actions include very different interventions, even within single Priority Actions. Some of these interventions are easily circumscribed to a specific target group (e.g., labour inclusion of victims of labour exploitation); others are more articulated and almost universal (e.g., interventions to ensure decent housing for seasonal workers);
2. Interventions include both initiatives addressed to geographical areas, particularly at risk of labour exploitation (e.g., labour inspections and awareness-raising of companies on ethical production in a specific province) and measures to be implemented throughout the country (e.g., provision by Job Centres of services dedicated to workers and entrepreneurs in the agricultural sector).
3. The number of institutions involved in implementing the plan at the national level and of institutions at the regional and territorial level could lead to different evaluation questions; this would take a lot of work to achieve through a single evaluation method.

The approaches to appraise the effects of a social policy ex-post are complementary rather than competing. The most logical approach, therefore, is to use counterfactual evaluations for punctual, circumscribed, and binary interventions. In contrast, all the others could be evaluated with a realist approach.

The evaluation of interventions aims to synthesise the outcomes of the different analyses and draw a logical conclusion on the Plan's overall value and the regional strategy to tackle labour exploitation in agriculture.

The following box offers insights into the evaluation approaches that can be considered for the interventions foreseen in some Priority Actions at the national and regional levels. It can be used to initiate a discussion with participants on the most suitable methods to evaluate the different interventions foreseen in the Priority actions. In this regard, the ILO *Guide to methodologies for ex-post evaluation of the effects of policies to tackle labour exploitation* provides a comprehensive overview of the evaluation approaches that can be used for each Priority action in the Three-year Plan.

Table 2: Possible evaluation approaches for some Priority actions of the Three-year Plan

Priority action	Main expected outcomes	A possible evaluation method
Action 2 Agri-food supply chain	- Completing the regulatory framework on unfair agricultural and food supply chain trade practices. - Strengthening and expansion of incentives on supply chain contracts for investment, technological innovation, corporate social responsibility, and producer aggregation. - Access by agricultural enterprises to investments under the Innovation Credit and other measures in the National Enterprise 4.0 Plan.	The expansion of incentives available to agricultural enterprises (both the supply chain contracts and the allocations of the Enterprise 4.0 Plan) represents a circumscribed intervention with well-defined recipients (agricultural enterprises) and binaries (participants and non-participants). For these interventions, it is possible to use a counterfactual impact evaluation to verify whether the enterprises that receive the incentives (treatment group) give more added value to producers than those that do not benefit from them (control group).
Action 3 Network of quality work in agriculture	- Revision of the regulatory framework of the Network of Quality Work in Agriculture (types of eligible enterprises, access requirements, territorial organisation, operational tools, and resources). - Increasing the number of enterprises joining the Network of Quality Work in Agriculture and developing a system of incentives for member enterprises. - Geographical spread and expansion of the territorial sections' functions and activities. - Creating of an online platform for managing and consulting enterprises registered in the Network of Quality Work in Agriculture. - Dissemination of joint responsibility practices in agri-food supply chains. - Participation of farms in ethical certification systems based on compliance criteria. - Greater awareness of the network's role in promoting agricultural products and decent work in the sector.	This priority Action presents both circumscribed interventions aimed at agricultural enterprises (registration incentives), and interventions of a non-binary nature (expansion of the functions of the territorial Sections), which are functional to the attainment of the final objective of the Action (increase in the number of enterprises participating in the Network of Quality Work in Agriculture). Punctual interventions, such as membership incentives, can be evaluated with a counterfactual method to check whether incentives increase the probability that agricultural enterprises join the network. A counterfactual evaluation could also be used to test whether participation in the network increases the likelihood of member enterprises adopting joint responsibility practices and participating in ethical certification schemes. Finally, a realist approach would make it possible to verify the existence of a causal chain between the Action's interventions and the outcome (increase in registered enterprises).
Action 5 Housing	- Definition of quality criteria for housing solutions for the design, management, and delivery of services at the local level. - Availability of long-term housing solutions for agricultural workers. - Implementation of emergency housing interventions and company guesthouses as an alternative to spontaneous settlements in areas at greatest risk of labour exploitation. - Improving the quantity and quality of accommodation services provided by local administrations to agricultural workers.	Although most of the housing interventions under this Action are amenable to a counterfactual impact evaluation, this method may not be feasible due to the difficulties of obtaining accurate data on agricultural workers living in critical housing situations. Two additional factors are likely to influence the outcomes: (i) the number of actors involved in the measure implementation (State, Regions, Municipalities) and (ii) the heterogeneity of interventions, since some areas are more exposed to spontaneous settlements than others. Theory-based evaluation with a realist approach would allow the evaluation of different mechanisms and contextual situations that influence the achievement of the outcome.
		Follows ...

... followed

Priority action	Main expected outcomes	A possible evaluation method
Action 6 Transports	- Guidelines and memoranda of understanding for designing and implementing integrated regional transport plans for agricultural workers. - Creation of regional registers for companies interested in providing transport services for seasonal agricultural workers. - Promotion by bilateral bodies of transport services for seasonal agricultural workers. - Improving the quantity and quality of dedicated transport services, including through the implementation of rural development programmes.	In this priority Action, two interventions of a circumscribed and binary nature could lend themselves to a counterfactual impact evaluation, namely the regional registers of private transport companies and the promotion by bilateral bodies of transport services. The data needed to measure the impact will likely be available since the counterfactual approach would have to verify the lower probability of unlawful recruitment (gangmaster system) situations in regions with regional registers and provinces with transport services promoted by Bilateral Bodies. A theory-based evaluation with a realist approach could provide valid answers for the evaluation.
Action 8 Enforcement	- Planning and implementing surveillance and law enforcement activities based on spatial mapping and the agricultural crop calendar. - Strengthening of National Labour Inspectorate (INL) s inspection services, including human and technical resources. - More effective coordination between the various inspection bodies (establishment of joint task forces at the territorial level and support from agriculture specialists). - Improving the supervisory system using information from other administrations. - Increase in the number of agricultural enterprises and workers inspected. - Development of guidelines and implementation of training programmes for inspection authorities on labour exploitation. - Training modules on identifying and combating labour exploitation for use by enforcement authorities, including violence and harassment in agriculture.	Almost all interventions aimed at strengthening surveillance and law enforcement have a universal (they affect all agricultural workers and enterprises in the sector) and non-linear, as priority will be given to areas with the highest risk of labour exploitation. Therefore, theory-based evaluation with a realist approach should be used. The only intervention a counterfactual evaluation could measure is the coordination between the different inspection bodies. Based on the assumption that: (i) in geographic areas where there is coordination between supervisory bodies (measurable in terms of the number of joint task forces established), a better coverage of workers and farms subject to inspection should be achieved, and (ii) not in all risk areas will joint task forces be established, the counterfactual evaluation will have to check whether the presence of joint task forces has a statistically significant impact on the probability that workers and enterprises in the agricultural sector are inspected (controlling for several workers and agricultural enterprises and several inspectors in the treatment and control areas).

Follows ...

... followed

Priority action

Action 9
Protection and
assistance

Main expected outcomes

- Planning and implementation of an integrated service system (referral) for the protection and assistance of victims of labour exploitation in agriculture.
- Development of guidelines on the referral system for operators of protection and assistance services for victims of labour exploitation.
- Harmonisation and strengthening of forms of protection for foreign victims of trafficking and labour exploitation to promote their social reintegration through access to decent work.
- Provision of protection and assistance services for victims of labour exploitation.
- Implementation of socio-occupational pathways integrated with referral services and protection and assistance mechanisms.

A possible evaluation method

All interventions in this Action have a universal nature (i.e., protecting all identified victims) but are non-linear (the number of victims benefiting from protection services will vary by geographical area according to the identified victims). The evaluation to be performed on the impacts of the interventions should therefore use **theory-based methods with a realist approach**, possibly in combination with **participatory evaluation** (involving implementers and final recipients), especially regarding the quality of the services rendered.



PART C

QUESTIONNAIRES



C1

Analisi bisogni formativi

Training need assessment

A. Personal data

(1) First name: _____ Last name: _____

(2) Date of birth: __/__/__ (dd/mm/yyyy)

Address: _____

City: _____

(3) Telephone _____ (4) e-mail _____

(5) Indicate the name of the relevant Sector, Department or Office.

(6) Indicate your function within your Sector, Department or Office.

B. Education and training

(7) Indicate the level of education:

Upper secondary education ☐

Bachelor's degree ☐

Master's degree ☐

Others (specify) _____ ☐

(8) Indicate the disciplines covered during the above studies.

(9) Indicate your training courses on labour and/or social policy monitoring.

Title of the training course(s)	Topics covered

C. Current assignment

(10) Indicate the tasks you performed that are relevant to prevent and tackle labour exploitation (e.g., development and/or implementation or monitoring of policies, specific actions, project coordination and/or monitoring).

(11) Which areas of preventing and tackling labour exploitation fall within your tasks?

- a) Data collection and processing ☐
- b) Victim protection and assistance ☐
- c) Labour intermediation ☐
- d) Socio-occupational reintegration of victims ☐
- e) Initiatives on ethical products and/or services ☐
- f) Accommodation for seasonal workers ☐
- g) Transport to and from workplaces ☐
- h) Supervision and inspection ☐
- i) Information and awareness-raising initiatives ☐
- j) Monitoring and evaluation of interventions ☐
- k) Others (specify) _____ ☐

(12) Indicate the main monitoring activities you have performed

(13) Evaluate the relevance of the Three-Year Plan to tackle labour exploitation and unlawful recruitment in agriculture (2020-2022) to your territorial context or working environment

(14) Is your Sector, Department, or Office involved in implementing the Three-year Plan? If the answer is affirmative, please indicate the activities performed

D. Training needs and expectations

(15) What are your expectations of the training programme?

(16) What topics should the training course cover? (Indicate up to three areas)

- a) Information on the development and implementation of the three-year plan ☐
- b) Priority actions of the Three-year Plan ☐
- c) Indicators of labour exploitation ☐
- d) Collection and analysis of relevant data ☐
- e) Development of monitoring indicators ☐
- f) Collection of monitoring data ☐
- g) Disaggregation of monitoring data ☐
- h) Analysis of monitoring data ☐
- i) Preparation of monitoring reports ☐
- j) Other (specify) _____ ☐

(17) Among the areas/functions listed in the previous answers, identify strengths and areas needing improvement

(a) Strengths	(b) Areas needing improvement

(18) Indicate three issues you would like to discuss to improve the monitoring of actions to prevent and tackle labour exploitation

1. _____
2. _____
3. _____

(19) Other observations or comments useful for the development and implementation of the training programme



C2

Evaluation of training programmes

Evaluation of training programmes

Seminar:	
Place:	
Date:	

Dear participant,

We kindly ask you to answer the questions in this questionnaire listed below. It is a valuable tool for evaluating aspects of the training programme you have attended.

The questionnaire is anonymous, and answers will only be processed and shared in aggregate form.

Thank you for your cooperation.

1 – Were the seminar’s objectives, content and method clarified before it began?	Fully	
	Sufficiently	
	Partially	
	It could be improved	
	Not at all	

2 – After this seminar, I believe that:	Fully	Sufficiently	Partially	It could be improved	Not at all
The training programme met my expectations	☐	☐	☐	☐	☐
The contents were interesting	☐	☐	☐	☐	☐
The training programme focused on relevant issues	☐	☐	☐	☐	☐
The contents were comprehensively covered	☐	☐	☐	☐	☐
Discussions and debates were given adequate space within the seminar	☐	☐	☐	☐	☐
The trainers/coordinators were helpful and took participants' feedback into account	☐	☐	☐	☐	☐
The trainers were professional and competent	☐	☐	☐	☐	☐
The training methods were appropriate and well structured	☐	☐	☐	☐	☐
The duration of the course was appropriate to the topics covered	☐	☐	☐	☐	☐
The group of participants contributed to my learning	☐	☐	☐	☐	☐
The venue was suitable to the participants' needs	☐	☐	☐	☐	☐

3 – After this seminar, I believe that:	Fully	Sufficiently	Partially	It could be improved	Not at all
The objectives of the training programme were achieved	☐	☐	☐	☐	☐
What I learnt will have a positive impact on my work	☐	☐	☐	☐	☐

4 – Overall, I consider the training programme of this seminar:	Very relevant			
	Relevant			
	More or less relevant			
	Scarcely relevant			
	Irrelevant			
☐	☐	☐	☐	☐

5 – What could be improved for this type of initiative? (Select one or more options)
☐ Provide more information before the
☐ Reducing the content covered
☐ Updating content
☐ Making group activities more stimulating
☐ Making business less difficult
☐ Slowing the pace
☐ Devote more time to the initiative
☐ Clarifying the objectives of the training programme
☐ Increasing the content covered
☐ Improving teaching methods
☐ Improving the organisation
☐ Making business more difficult
☐ Accelerating the pace
☐ Reducing the time of the

6 – After this exchange of information, how relevant do you consider the following topics?	Very relevant	Relevant	More or less relevant	Scarcely relevant	Irrelevant
Monitoring and evaluation systems	☐	☐	☐	☐	☐
Monitoring and evaluation of interventions (at the national and/or local level)	☐	☐	☐	☐	☐
Project Performance Monitoring and Evaluation	☐	☐	☐	☐	☐
Collection and analysis of monitoring data	☐	☐	☐	☐	☐
Ex-post evaluation of interventions to tackle labour exploitation	☐	☐	☐	☐	☐

7 – Which parts of the training programme were most valuable and why?

8 – Which parts of the training programme could have been more helpful and why?

9 – Further observations and comments

► **International Labour Organization**

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