



Participatory analysis of the regional and local initiatives to prevent and tackle labour exploitation in agriculture

Executive summary of the final report

“Support to strengthening the inter-institutional governance in the field of labour exploitation in Italy”



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The Italian Ministry of Labour and Social Policies (MLPS) – with the technical support of the Italian Office of the International Labour Organisation (ILO) and the DG REFORM of the European Commission – has promoted a participatory analysis, within the framework of the *Three-Year Plan to tackle Labour Exploitation and 'Caporalato' in Agriculture (2020 - 2022)*, which features the involvement of a range of stakeholders – institutional actors, social partners and regional/local operators – with the aim of investigating the relevance of the priorities set out in the Plan at regional and local level. The objectives of the analysis were (i) to verify the relevance of the Plan's priorities at regional and local level; (ii) to examine the initiatives implemented at regional and local level, in relation to the prevention and contrast of labour exploitation in agriculture; and (iii) to analyse the institutional capacities and emerging needs regarding the consistency of the initiatives and the possibility of strengthening them by way of coordination and monitoring actions. The ILO methodology was applied for the functional analysis of the labour institutions, adapted to take into account the specificities of regional and local contexts. The report that follows contains a summary of the information collected during the launch seminar (December 2020); legislative texts, policy documents and other material; and a series of bilateral meetings with officials and experts from Regional Administrations; Prefectures; Interregional and Territorial Sections of the National Labour Inspectorate (INL); Regional Employment Agencies; Job Centres (CPI); Employers' Organisations and Trade Unions; Territorial Sections of the Quality Agricultural Work Network; Bilateral Bodies; Municipalities and Unions of Municipalities; and Non-Governmental and Third-Sector Organisations.

The phenomenon of labour exploitation in the regions of Lazio, Puglia and Piemonte shows substantial differences not only between regions, but also between different locations within the same region, depending on the crops, production cycles, the type of businesses involved, and the number and characteristics of the workers employed. In **Lazio**, the most critical points are found in the Agro Pontino area of the province of Latina, in fruit and vegetable farming and the floriculture and dairy production sectors. Businesses here include both large and small farms supplying the local markets. Harvesting and production is carried out by Italian workers and by permanent and seasonal migrants – mainly from the Indian Punjab region and Eastern Europe (Romania, Poland, Albania). Generally speaking, Indian workers are recruited in the villages of Punjab by compatriots who offer “all-inclusive packages”, including travel, accommodation, residence and work permits. Those who lack the financial means to buy such packages generally contract a debt with the recruiters, which they then pay back through their work. In **Piemonte**, labour exploitation concerns both the province of Cuneo, in the orchard farming sector, and the Langhe and Monferrato wine-growing areas. Workers from sub-Saharan Africa are mainly employed in fruit picking in the Saluzzo area (province of Cuneo), while workers from Eastern Europe (Macedonians, Albanians and Bulgarians) are employed predominantly in grape harvesting in the Langhe and Monferrato areas (provinces of Asti and Cuneo). Not all the workers who come to Piemonte for the harvesting season manage to find accommodation and many are forced to sleep rough, in the streets or abandoned buildings. In **Puglia**, the phenomenon of labour exploitation is widespread throughout the region, with peaks in the provinces of Foggia, Lecce and Bari and in the fruit and vegetable farming sector. The situation in Puglia differs from the other two regions for several reasons. Firstly, Puglia is interested by three different types of migration flows: (i) transit flows (migrants who land in the region but want to reach other parts of the country); (ii) extensive settlements of migrant workers; and (iii) seasonal flows driven by the need for labour in agriculture. Secondly, the widespread

presence of informal settlements, some of which are quite large and which provide the *caporali* (illegal labour brokers) with a vast pool of labourers from which to draw and make large profits. Finally, the illegal recruitment and informal labour methods are more longstanding here.

The factors common to the three regions are the importance of the agricultural sector within the regional economy, accounting for a significant and growing turnover; the increase in the number of foreign workers involved in the farming activities; and the type of violations committed. The latter include illegal or misleading intermediation; remuneration below the minimum established by collective bargaining and/or subject to unlawful deductions; long working hours beyond the maximum legal limits, without rest or holiday entitlements; breaches of the occupational health and safety regulations; oppressive and violent surveillance methods; and degrading accommodation in overcrowded situations. The main areas of activity of the "*caporali*", namely, labour intermediation, accommodation and transport, are the same in the three regions, but vary in intensity according to local specificities and circumstances.

The strategy adopted by the region of **Lazio** to combat the phenomenon of labour exploitation is based on a tripartite Memorandum of Understanding, signed in 2019, which focuses on labour intermediation and transport, and which has since been implemented, on an experimental basis, in the province of Latina, and on the promulgation of a regional law covering almost all the areas of the three-year plan (intermediation, transport, housing, ethical supply chain, fairness indexes, conditions for companies looking to obtain public grants, Quality Agricultural Work Network, victim support services). The Regional government funds and coordinates the measures, which are implemented through a range of actors engaged in preventing and combating the exploitation (regional institutions, local authorities, employers' associations and trade union organisations, third-sector organisations, cooperatives and voluntary organisations). The policies implemented by Lazio are structural in nature and envisage medium- and long-term strategies based on consultation with the social partners and building on the results of the experimental trials carried out in specific areas of the region. Both the tripartite consultation and the trials facilitate the adoption of the necessary tools and mechanisms, which, however, may be difficult to implement, at least initially, such as the fairness indexes and conditions for businesses looking to apply for regional grants. This *modus operandi* enables integrated actions against labour exploitation, ranging from labour brokering, reception and transport to the protection and assistance of the victims, followed by their socio-occupational reintegration. However, a strategy based primarily on medium- and long-term actions could delay the resolution of emergency situations that require immediate intervention to protect the most vulnerable workers.

The strategy adopted by **Puglia** is based on the 2009 regional law on the inclusion of migrant workers and on a system of integrated services (work, education and welfare) and on the Experimental Protocol signed in 2016 on intermediation, housing, transport, health & safety, training and work placement. In the past, the regional strategy had a purely emergency response approach aimed primarily at offering housing alternatives to the inhabitants of the informal settlements, while the more recent approach combines emergency interventions and structural measures in the areas of labour, migration, housing policies, welfare and social inclusion. However, emergency interventions still seem to prevail, with actions on housing and transport far more widespread on the ground than those aimed at matching labour demand and supply, surveillance, agri-food supply chain, ethical production, protection, assistance and the socio-occupational inclusion of the victims of exploitation. This situation is partly due to the widespread labour exploitation in the Region, but also partly to the type of funding the Region has had access to in recent years. The own and other financial resources, in fact, involve a large number of implementers, which considerably hampers all coordination efforts. The Regional government is engaged in a coordinated effort with the Prefectures at the provincial level (Foggia, Bari and Lecce), with the local branches of the Agricultural Work Quality Network and with other mechanisms. The large number of actors involved has the advantage of pooling a broad range of competences, which

can be useful in solving critical issues, while the downside is the risk of a scattergun approach and of less consistency in responding to the needs of workers and agricultural enterprises.

The **Piemonte** Region has not yet adopted a strategy to prevent and combat labour exploitation. There are regional laws that regulate the temporary accommodation of seasonal workers on farms or through municipal initiatives. The priorities of the 2019 Memorandum of Understanding, which has not been renewed, involved transport, medical and health care, the use of confiscated or state property for accommodation, community-based job information and guidance projects, the preparation by the Job Centres of reservation lists and the implementation of training programmes in Italian. However, all these interventions seem to prefer an emergency response approach, limited to accommodation solutions, in the Saluzzo area only, subject to renewal on a year-by-year basis. Coordination is ensured by the different branches of the local governments. The *Labour Policies Unit* is responsible for coordinating labour exploitation activities, while the Memorandum of Understanding is coordinated by the *Agenzia Piemonte Lavoro*. The *Equal Opportunities, Rights and Inclusion Policies Unit* coordinates the project financed by the Asylum, Migration and Integration Fund (FAMI), while the Institute for Economic and Social Research (IRES) is primarily involved in managing project activities and coordinating with local partners in the Saluzzo area.

Despite the different policies and strategies put into place by the regions, their interventions mainly concern labour intermediation, transport and housing. Other types of interventions falling within the scope of the priority actions of the Three-Year Plan are either experimental in nature or limited in scope, also in terms of financial investments. Interventions concerning labour intermediation aim primarily to improve matching labour supply and demand through online applications, with less attention paid to the use of mobile one-stop-shops for bringing services closer to the workplaces and the workers and to the implementation of intermediation monitoring systems, especially in the private sector. Housing measures range from temporary guesthouses to forms of community-wide accommodation, including co-housing solutions. With regard to transport, measures include both free public transport and the implementation of public-private partnership solutions (demand responsive shuttles).

All three regions share some common critical points, concerning the involvement and participation of farm businesses in the planned and implemented interventions; such as the mechanisms put in place to promote the participation of farm businesses in the activities of the local branches of the Quality Agricultural Work Network (reward or condition based systems); as well as facilitating access to remedies for the victims of labour exploitation, organising protection and assistance for victims and services for socio-occupational inclusion. Finally, the lack of effective performance monitoring systems and impact assessments prevent the development of evidence-based policies on what works, where and why.

Implications for the policies and programmes in the three Regions

A. Development and implementation of policies and strategies

- 1. Adopting an integrated approach to prevent and contract labour exploitation in agriculture.** Several critical issues in the fight against labour exploitation emerged, during the analysis, with regard to the areas of competence of the national authorities, such as the commercial practices of large-scale retail trade and their involvement in preventing and combating labour exploitation; the management of foreign worker flows; the scope and quality of inspection activities; the simplification of recruitment procedures for seasonal workers; the reduction of labour costs in the sector; and the reform of employment services (scope and quality of the services, human and financial resources, simplification of procedures). Addressing these issues would enhance the effectiveness of the actions planned and implemented at regional level. Implementation at regional level

has demonstrated the added value of the interventions on labour matching, housing and transport. However, in order to achieve the expected effects, the three interventions should: (i) be structural in nature, rather than based on an emergency response mechanism; (ii) be implemented concomitantly, with the same progression; and (iii) ensure a good territorial coverage. The lack of any one of the above elements might shift the phenomenon to other geographical areas or prompt the “*caporali*” to concentrate on the weaker market segments or worsen the state of need and vulnerability of some workers compared to others. Less attention is paid to the other thematic areas of the three-year plan at the regional level, such as the agri-food chain, the Quality Agricultural Work Network, fair trade certification, surveillance, and the protection, assistance and reintegration of the victims of labour exploitation. However, the Regions should make a more committed effort to protect, assist and reintegrate the victims, given their competences in social and welfare policy planning and their integration with the health services, as well as their competences in employment services, training and active labour policies.

2. **Combining emergency response policies and interventions with medium-to-long-term structural approaches.** The analysis of the policies and strategies implemented at regional level to combat labour exploitation in agriculture has confirmed the importance of approaches that include both emergency interventions responding to the more urgent needs of seasonal workers besides migration, labour, welfare and social inclusion policy measures based on a medium-to-long-term strategy. The Regions, however, are failing to factor agricultural and rural development policies into the “policies-strategies-interventions against labour exploitation” equation. These well-funded policies are essential for dealing with issues related to the agri-food chain, crop profitability and investments, as well as issues related to low generational replacement, rural depopulation, production competitiveness, environmental protection and maintaining biodiversity.
3. **Calibrating demand-side and supply-side policies and tools.** The tendency to integrate interventions aimed at tackling labour exploitation into regional policies on labour, occupational health and safety, migration and inclusion is a priority for all three regions. This path could be pursued by drawing on the tools that can impact labour demand, such as, for example, agricultural and regional development policies serving as an incentive for the type and production levels of farm businesses, product quality, marketing and production organisation, including staff recruitment and management methods. The need to draw on these policies is shared by the labour representatives, albeit with different viewpoints, which, however, could be reconciled to a certain extent through dialogue. For example, there is a widespread opinion among employers that the funding made available by these policies should offer “rewards” to businesses that apply a code of ethics and social responsibility. On the other hand, the trade unions think that the funds should be made subject to the satisfaction of certain “conditions” regarding respect for workers’ rights.

B. Providing services and implementing measures

4. **Strengthening the Quality Agricultural Work Network’s local branches.** This Plan priority action is a critical factor shared by the three Regions. Even in the areas where the Network has been established, its mandate, functions and operational aspects still seem to be unclear and ineffective. The manner of operation and performance of each branch seem to depend on the skills of the local coordinator rather than on objective and uniform countrywide criteria. Even in the Regions which promote adhesion to the Network in their policies, the limited adhesion by businesses and erratic operation of the local branches has

led to the general disheartenment of decision makers and the definition of alternative instruments. Rethinking the Network's functions and role, as well as the incentives to join and promotion of the member businesses (such as the case of Emilia Romagna, which requires registration to the Network in order to become eligible to receive grants out of the regional development fund), could give new impetus to the Network as an important part of the overall system for preventing and combating labour exploitation. Besides the expectations of the trade unions, businesses could also remove the risk of being excluded from national and international orders, in cases where the areas they operate in are plagued by "*caporalato*" activities. However, to achieve this it will be necessary to enhance the visibility of and promote the businesses that join the Network, as envisaged in the National Plan. The registration of so-called "landless businesses" with the Quality Agricultural Work Network remains a priority in all the regions to avoid the spread of "modern-day *caporalato*".

- 5. Improving supervisory and inspection activities.** The need to strengthen supervision, in terms of both increasing the number of inspections and the timeliness of the response by the competent bodies has been expressed by several stakeholders, in particular the trade union representatives. This priority action would also require greater coordination and/or integration with other actions at local level. The tendency of the southern regions to set up regional Committees mirroring the national Committee could foster a greater exchange of information and more coordination and integration, with a view to considering these activities not as a "world apart" but a "link in the same chain".
- 6. Developing a protection, assistance and socio-occupational integration system also by building on the trials and the project-based experience.** The participatory analysis has revealed the "immaturity" of the protection and assistance initiatives, also with regard to the socio-occupational integration of the victims of labour exploitation. The three Regions have launched some interesting projects in this field (e.g., Lazio recently involved the employment centres in the *FairLabor* initiative and tested a multifunctional centre offering integrated services, along the lines of a "one-stop-shop" model; Piemonte has involved the employment centres in providing services aimed at preventing and combating labour exploitation in agriculture and a series of project initiatives are being implemented in Puglia which envisage a combination of protection and assistance services with support in social and labour inclusion). None of the regions have designed a system of services and programmes based on victim identification and referral to specialised services, access to remedies and participation in transition to decent work services and programmes. The lack of such a system could frustrate the prevention and law enforcement efforts made in other priority areas. This could produce what is known as a labour policy "carousel" effect or "re-victimisation" process in the area of labour exploitation and forced labour, resulting in the workers being trapped in a vicious cycle of exploitation as they move from one exploiter to another. Implementing a system based on protection and assistance measures and including support in transitioning from exploitative to "decent" work can improve the effectiveness of other actions and break the vicious circle of exploitation. The regional authorities, in order to build a system better adapted to the local circumstances, could draw inspiration from the initiatives implemented in other countries, also with a view to fulfilling the international obligations on human rights and fundamental labour rights.
- 7. Applying a gender-based approach to planning and implementing policies and programmes for the prevention and contrast to labour exploitation.** Planning the interventions for preventing and combating labour exploitation in agriculture according to a gender-specific focus is a need that has been expressed by all the stakeholders participating in the analysis. Significant gender-based imbalances in power relations,

greater gender-related vulnerabilities and multiple and interconnected forms of discrimination that undermine the right to equality and non-discrimination in employment and occupation should be taken into account when planning and implementing interventions. Therefore, viewing these interventions through a “gender lens”, besides involving Equality Advisers (not mentioned by any of the stakeholders), could kickstart a more responsive process towards the needs and individual characteristics of the workers. This would help make the interventions fairer and more effective.

C. Coordination and consistency

- 8. Rethinking the activities of Municipalities by promoting local multisectoral plans.** The governance of the three-year plan requires that the Municipalities and Unions of Municipalities may prepare multi-sectoral plans for interventions by the Network's local branches, the Regional governments, the “*Caporalato*” Committee and the Network's Steering Committee. Although the interviewees agreed on the central role played by the municipalities in the fight against labour exploitation, the municipal authorities are rather reluctantly involved in the interventions by the Regions for the following reasons: the low priority given by the municipal authorities to labour exploitation in agriculture; the scarcity of human and financial resources to formulate, manage and monitor the interventions; and the lack of effective tools for communicating with the local communities. The establishment of an *ad hoc* facility to provide technical support to any interested municipalities could be useful to promote their participation in planning and implementing the interventions.
- 9. Broadening the vertical coordination between the Central and Regional governments in relation to project planning activities.** Vertical coordination between the Central and Regional governments, in respect of the policies and strategies for combating labour exploitation in agriculture, does not seem to extend to the design and implementation of specific projects. This hinders the involvement of the entities responsible for implementing the projects in the activities of the regional and local authorities, with a negative effect also on horizontal coordination locally. To overcome these difficulties, the Regions have emphasised the need to establish closer coordination with the authorities, at the national and other levels, in the management of the financial resources allocated through calls for tender and projects, to avoid the duplication/overlapping of interventions, promote their coherence and maximise their results.
- 10. Implementing initiatives fostering horizontal collaboration between the Regions in relation to labour exploitation.** Many Regions are implementing initiatives aimed at preventing and combating labour exploitation in agriculture. However, there is still no mechanism in place for cooperation among the Regions to exchange experiences, share tools and other materials, and implement joint training and capacity-building activities.
- 11. Expanding the tools to provide the victims of labour exploitation with access to remedies.** The remedies for victims of labour exploitation should be reconsidered, at both national and regional level, in particular the advance payment of back wages and of the physical and moral damages suffered. Interviews, especially with the trade unions and third sector organisations offering legal assistance, have highlighted critical issues in relation to (i) the judicial control of companies, which often leads to job loss and re-victimisation of workers, even where a special administrator is appointed; (ii) the lengthiness of court proceedings, which discourages appeals for damages; and (iii) the lengthiness of dispute settlement and conciliation procedures for the payment of back wages. Moreover, the sum of 1,500 euros payable by the Anti-Trafficking Fund requires a prior court judgment for the victim to be eligible for compensation. In order to overcome

the lengthiness of legal proceedings some European countries pay the victims of labour exploitation in advance, with the State then claiming compensation from the perpetrators after due process of law. These mechanisms are in line with the State's responsibility to ensure respect for human rights, including labour rights, and to return any ill-gotten gains from the violation and abuse of these rights.

- 12. Improving monitoring of the phenomenon and of performance and impact evaluation.** Formulating and implementing policies and strategies that aim to effectively address the complex nature of labour exploitation requires a data collection and processing system, in order to provide policy-makers with accurate information on the different forms of the phenomenon in the different areas, agricultural production trends (crops, profitability, average plot size), the labour needs of businesses, and employment (characteristics of jobseekers, contracts, hours worked, wages), but also on the effects of the interventions implemented with regard to agricultural workers and, above all, the victims of exploitation. A monitoring and evaluation system, based on a set of quantitative and qualitative performance indicators and including impact assessments (of the more far-reaching interventions), would provide the necessary information for evidence-based policymaking.

Implications for the specific policies and programmes of each Region

Lazio

- 13. Adapting the areas of intervention to the regional strategy.** The strategy adopted by Lazio – centred on a tripartite approach, on medium-long term structural interventions and on experimental testing – provides the opportunity to broaden interventions, in terms of both their thematic priority (with actions targeting all the key areas for preventing and contrasting labour exploitation) and their geographical and sectoral scope. The long implementation timeframes, however, can lead to failure in addressing situations that require immediate action to safeguard the workers' fundamental rights. Complementing the actions already underway on intermediation, transport and housing by accelerating the measures that target other priority actions of the three-year plan would benefit from important synergies and maximise the results and their impact.
- 14. Defining the intervention priorities on the basis of the data and other available resources.** The interventions planned by the Region require considerable financial outlays, which, however, is only partially satisfied in the policy documents adopted so far (Regional Law 18/2019 and implementing regulation 5/2020). One possible strategy to maximise the available regional resources and the expected results is to prioritise interventions based on objective data. In particular, the combination of interventions on intermediation, transport and housing with assistance and protection measures for the victims would make it possible to address most of the problems on the supply side, and then move on to actions on the demand side (fairness indices, incentives to businesses, rewarding ethical production). The ideal situation, however, would be to substantially increase the budget for synchronous action to be taken against labour exploitation in all the priority areas.
- 15. Supporting the launch of the initiatives with information and communication activities to encourage greater involvement.** Communication and information activities regarding ongoing and planned interventions should be improved, especially those targeting farm businesses and the communities most exposed to labour exploitation. This would make it possible to understand which improvements to make to the available tools (e.g., the Fair Labour mobile application) and which incentives can more effectively achieve

the desired results (e.g., the willingness of municipalities to accept community-wide migrant reception strategies).

- 16. Accelerating the creation of a Regional Observatory and testing innovative trial methods.** The Region should consider speeding up the establishment of the Regional Observatory on Work in Agriculture and upgrading its overall intervention monitoring and evaluation system. This would increase the availability of timely, reliable and accurate information for decision-makers and lead to a better understanding of what works, for whom and under which circumstances. The evaluation and analysis of the effectiveness of the results achieved through the experimental trials carried out by the Multi-purpose Centre could be usefully replicated in other areas of Lazio and other Regions.

Piemonte

- 17. Developing a strategy for preventing and combating labour exploitation in agriculture.** The Region should consider adopting a strategy to prevent and combat labour exploitation in agriculture, which could support the emergency measures currently being implemented by introducing further migration, labour, agriculture and social inclusion policies. This is because agriculture accounts for about 36% of land use and the agri-food sector as a whole accounts for about 4.5% of the Region's added value, while at least three of the Region's eight provinces are affected by serious forms of labour exploitation in agriculture (Alessandria, Asti and Cuneo)
- 18. Encouraging the involvement of various actors in formulating and implementing the regional interventions.** In planning its initiatives to prevent and combat labour exploitation the Region could provide for a greater involvement of the local actors (employment centres, provinces, municipalities, employers' associations, trade unions, third sector organisations). The lack of knowledge at the local level about the initiatives and tools put in place to improve matching labour supply and demand and ensure the reception of seasonal workers could be due to the limited involvement of the local actors. It could be possible to strengthen their involvement – in particular of farm businesses, local authorities and municipalities at higher risk of labour exploitation – in conjunction with the implementation of information and awareness-raising activities, for both operators and communities, about the interventions under way. This would also be aimed at analysing: (i) the reasons for the limited use by employers of the job app developed by the Piemonte Employment Agency; and (ii) the tools that can better help overcome the reluctance towards adopting community-wide forms of reception, among the authorities and the population, in some municipalities at risk. Even if actions to involve the actors and the population at large can be seen as increasing transaction costs, they do bear fruit in the implementation phase, especially if they are able to balance and mediate among the interests of all the stakeholders.
- 19. Broadening the fields of intervention and geographical areas.** Regional interventions should be broadened – in terms of both scope and geographical reach – to avoid the responsibility for providing assistance to workers in areas at risk from falling squarely and solely on the shoulders of the municipalities, third sector organisations and trade unions. This would require more resources, which could also be accompanied by the conclusion of public-private partnerships.
- 20. Evaluating the interventions implemented to date and distilling the lessons learned.** The experience built up by the Region of Piemonte in strengthening and involving the employment services in the prevention and combating of labour exploitation in agriculture could also inspire other regions. Therefore, it would be appropriate to evaluate the quality,

effectiveness and impact of these interventions and distil the lessons learned, in view of further initiatives that could be carried out by the Region and sharing the results with other Regions. It could be a good idea to evaluate the initiatives and analyse the lessons learned regarding the accommodation made available (i) by the farms, on the basis of regional law 12/2016, (ii) by the former Filippi barracks in Saluzzo (video surveillance, continuous police supervision, prohibition of enter/leave the premises outside the established hours), and (iii) by community-wide reception programmes in the rural municipalities concerned.

Puglia

21. **Continuing to ensure the consistency of the labour, migration, welfare and social inclusion policies also by defining and implementing dedicated measures and/or projects.** For some years now the Region has adopted a mix of employment, migration, welfare and social inclusion policies with emergency housing and transport measures. Structural interventions, however, are still too few and far between. The Region should consider rebalancing its priorities and interventions by introducing more incisive measures affecting the supply chain (agricultural and rural development policies) and, above all, the protection, assistance and socio-occupational reintegration of the victims.
22. **Redefining the use of resources, through improved integration and public-private partnerships.** Integrated strategies combining emergency interventions with policy measures require considerable financial outlays. Therefore, the region should play a stronger role in directing the financial resources from national and European sources and exploring the possibility of concluding public-private partnerships to finance specific interventions (e.g., house-sharing initiatives and the rehabilitation of rural villages).
23. **Activating the Regional Committee for preventing and contrasting labour exploitation to foster coordination beyond the Regional Administration.** The current coordination system, which involves both regional and provincial Committees and a division of the Presidency of the Region (*Public security, Migration Policy and Social Anti-Mafia Division*), has been operational for a number of years. In light of the multiplicity of project interventions currently under way and the fact that there is no integrated monitoring system, it would be appropriate to consider establishing a more straightforward system based on coordination and monitoring activities by a Regional Committee on the prevention and combating of labour exploitation and the formulation of participatory interventions (also on the basis of thematic and territorial groups). This would facilitate the regional governance processes.
24. **Speeding up the establishment of a regional Observatory on Migration.** The Region could speed up the establishment of a regional Observatory on Migration, like the one in Lazio, also in support of the development of an intervention monitoring and evaluation system to inform the decision-making processes.

Implications emerging during the restitution seminar

25. **Preparing a summary of the results of the participatory analysis** for the three representatives of the Regions, so that they can be shared with the other Regions.
26. **Assessing the opportunity of reproducing the inter-regional joint design and coordination mechanism** on labour exploitation by five southern Italian Regions (with Puglia as the lead partner) in the central and northern (or north-western and north-eastern) Regions with the coordination of a lead partner.

27. **Considering the creation of inter-regional Observatories** on preventing and combating labour exploitation and promoting decent work in agriculture, with a view to capturing and monitoring macro-indicators on agricultural labour trends across regional boundaries. These Observatories could be linked to the National Observatory on the labour market, established by Decree No. 34/2020, in coordination with the conversion law No. 77/2020 and with the emerging information system on the quantity and quality of work in agriculture – Action 1 of the National Plan).
28. **Considering the development of a horizontal coordination platform between the Regions** aimed at exchanging experiences, sharing instruments and mutual learning in relation to the prevention and combating of labour exploitation.
29. **Defining the two Regions that could launch the trial of a system for protection, support and socio-occupational inclusion** in collaboration with the MLPS and with the technical support of the EC and ILO. For continuity purposes and based on the knowledge acquired through this participatory analysis, it would be desirable for the two Regions to be selected from among those analysed in this report.