



**1 May Labour Decree:
new employment incentives and fair wage rules.
But is it all really fair?**

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Fair wages.

The Italian cabinet met on Tuesday, 28 April 2026 to approve the new Labour Decree, a broad, structured package that takes a major step forward in employment policy and worker protection. The decree introduces urgent provisions on fair wages, employment incentives and measures to combat exploitation, particularly in digital platform work. It is built around the principle of a fair wage, understood as overall pay that reflects the quantity and quality of the work performed.

More specifically, Article 7 states that a fair wage is to be assessed by reference to the overall pay package set out in national **collective bargaining agreements signed by the most representative employers' and workers' organisations at national level. The provision also addresses collective agreements signed by organisations that do not meet this representativeness threshold.** In these cases, **the overall pay package may not be lower than that provided for by the national collective bargaining agreement most closely connected with the employer's actual activity** — taking into account the sector and production category concerned, the employer's main or predominant activity, and its size and legal form.

The decree also makes clear that the benefits set out in it (as below) are available only where the “fair wage” principle is complied with.

The decree provides that, once Parliament has approved the decree-law and it has become ordinary legislation, vacancies published on the SIISL platform (Italy's digital system for jobseekers and labour intermediation) must indicate the alphanumeric code of the applicable national collective bargaining agreement, as well as the pay linked to the relevant job classification and contractual level for the duties assigned to the worker.

Interpreted literally, the new provision would appear to focus on the equivalence of the pay arrangements provided for by national collective bargaining agreements. This would include not only basic pay, but also other pay-related elements, such as additional monthly payments, allowances, premium rates and seniority increments. However, some uncertainty does linger over items such as performance bonuses and company welfare benefits. Conversely, the provision refers only to national collective bargaining. In practical terms, this means that any arrangements under second-level collective agreements, whether territorial or company-level, are not part of the fair wage assessment.

There is no doubt that the decree introduces a new benchmark for fair wages. At the same time, it raises a number of questions that will only be resolved over time, as official guidance is issued, legal commentary develops, further trade union agreements are reached and the courts

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begin to rule on the provision.

Doubts remain in particular for sectors without collective bargaining agreements. In these cases, applying the same criterion indicated above, the overall pay package must be at least equal to that provided for by the national collective bargaining agreement most closely connected with the employer's actual activity — taking into account the relevant sector and production category, the employer's main or predominant activity, and its size and legal form. Further questions also arise in sectors where several collective agreements may be relevant, especially where they are not clearly distinguished on the basis of size.

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Hiring incentives.

The second key area covered by the decree concerns employment incentives. The aim is to reduce regional gaps and support the hiring of young people and women. The decree introduces a new framework for 2026, rather than simply extending the existing measures. However, employers will need to wait for the relevant implementing guidance, in particular the expected INPS circulars, before they can actually claim the forms of relief outlined below.

Four main employment incentives are envisaged, with two of these explored below.

2026 Youth Hiring Bonus

Private-sector employers that hire young people on permanent contracts between 1 January 2026 and 31 December 2026 are entitled to full relief from the social security contributions payable by the employer, excluding INAIL insurance premiums, for up to 24 months. The incentive applies to workers who, at the date of hiring, are under 35 and have been unemployed for at least 24 months. For specific categories of disadvantaged workers, the required unemployment period is reduced to at least 12 months. The relief is capped at €500 per month for each worker. This rises to €650 per month for hires made in the regions included in the Special Economic Zone for Southern Italy.

The incentive can also be used for workers moving from another permanent employment relationship where a previous employer has already used part of the relief. Access to the incentive is subject to a number of conditions: the hire must result in a net increase in employment compared with the average workforce over the previous 12 months; and

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the employer must not have made any individual dismissals for objective business reasons or carried out collective redundancies in the same production unit during the previous six months. Executive, domestic or apprenticeship contracts are not covered by the incentive. In addition, if the employer dismisses

the subsidised worker, or another employee with the same qualification, in the six months following the hire, the benefit is revoked and any amounts already used must be repaid. The funds allocated to the measure are subject to spending limits and will be monitored by INPS, which will stop accepting applications once the available funds have been used up. The incentive cannot be combined with other forms of contribution relief. However, employers can still combine it with tax measures that increase the deductible labour cost for new hires, provided they comply with EU State aid rules.

2026 Youth Contract Conversion Bonus

The decree introduces an incentive designed to support stable youth employment by encouraging employers to convert fixed-term contracts into permanent contracts. Private-sector employers are entitled to full relief from the social security contributions payable by the employer, excluding INAIL insurance premiums, up to a maximum of €500 per month for each worker and for a period of up to 24 months.

The relief applies to contractual conversions between 1 August 2026 and 31 December 2026. It covers fixed-term contracts with a duration of no more than 12 months that were entered into by 30 April 2026. The workers concerned must be under 35 and must never previously have had a permanent employment relationship.

The benefit is subject to a number of conditions. First, the conversion must produce a net increase in employment compared with the employer's average workforce over the previous 12 months. In calculating that increase, the employer must apply specific rules for part-time workers and must also factor in changes in headcount within associated or controlled companies. Domestic and apprenticeship contracts are not included.

The relief is not available to employers that have made individual dismissals for objective business reasons or carried out collective redundancies in the same production unit during the previous six months. In addition, if the employer dismisses the subsidised worker, or another employee with the same qualification, within six months of the conversion, the incentive is revoked and any amounts already used must be repaid.

The measure will need to be authorised by the European Commission and will apply only within the allocated spending limits, with INPS responsible for monitoring take-up. Employers cannot combine the incentive with

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other forms of contribution relief available under current legislation, but they can still use it alongside the increased deduction for labour costs on new hires.

Digital platform work, notably riders

Chapter III of Decree-Law no. 62 of 30 April 2026 introduces new rules for digital platform work, with a particular focus on the risk that such platforms, as well as apps or algorithmic systems, may be used to organise and exploit workers unlawfully. In Italy, this is referred to as **caporalato digitale** — basically digital gig-work exploitation. The main aim is to increase transparency, safety and controls over work carried out through apps or platforms. The decree focuses on the proper management of employment relationships where automated or algorithmic systems exercise powers normally held by the employer, such as organising, directing and monitoring work. In this context, the decree strengthens both the information that must be provided to workers and the communications that must be made to the competent authorities. The latter is also designed to help tackle undeclared work.

For riders specifically, the decree amends certain provisions of Legislative Decree no. 81/2015, increasing the protections available to them. The primary aim is to make sure that the person using the platform is **clearly and properly identified**. Riders will only be able to access delivery platforms using one of Italy's recognised digital identity tools — the Public Digital Identity System (SPID), the electronic identity card (CIE) or the national services card (CNS) — or using an account issued by the platform itself and linked to a single tax code. In the latter case, the account must use multi-factor authentication and **must not be transferable to anyone else**. A breach of this rule carries an administrative penalty of between €800 and €1,200. The decree also sets out that platforms may not issue more than one account for each tax code. A breach of this rule carries a penalty of between €1,000 and €1,500 for each additional account linked to the same tax code.

A further protection is being introduced from 1 July 2026, when platforms will be required to prepare and provide workers each month with the **Libro Unico del Lavoro** (LUL), Italy's mandatory employment register recording key payroll and employment information. For riders, this document must also show the total number of deliveries made.

Lastly, workers using such platforms and apps (notably riders) will be required to complete **mandatory workplace safety training** through the **SIISL platform** within 30 days of their first shift. If the worker does

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not complete the course within the required deadline, this will be reported to the platform company commissioning the work. The company will be liable to financial penalties if it continues to use the services of a worker who has been flagged for non-completion of the required training.

New certification for family-friendly policies and contribution relief

Paragraph 6 of the Labour Decree introduces **UNI/PdR 192:2026 certification, designed for public and private organisations that invest in maternity, paternity, care responsibilities, organisational flexibility, company welfare, health and career continuity.** It does not replace the existing gender equality certification, now increasingly common, but sits alongside it.

Companies that obtain the certification will be entitled to relief from social security contributions payable by the employer. The relief may not exceed 1% and is capped at €50,000 per year for each company, in compliance with State aid rules. The exemption is recalculated and applied on a monthly basis. It will also be adjusted according to the funds available.

SIISL PORTAL

Use of the SIISL portal for mandatory communications and hiring incentives .

Article 5 of Decree-Law no. 48 of 4 May 2023, converted into law with amendments by Law no. 85 of 3 July 2023, established the Sistema Informativo per l'Inclusione Sociale e Lavorativa (SIISL). Literally the Information System for Social and Labour Inclusion, SIISL is a digital platform based at the Ministry of Labour and Social Policies and technically developed by INPS.

SIISL was created as a single platform to help employers and jobseekers connect, while also supporting training and routes back into work.

To access the platform, employers, workers and intermediaries must use one of Italy's recognised digital identity tools: the Public Digital Identity System (SPID), the electronic identity card (CIE) or the national services card (CNS). For workers, registering with SIISL makes their professional profile visible to companies, gives them access to training opportunities and allows them to receive targeted job offers. A significant number of users are already in the system because recipients of NASpl and DIS-

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COLL unemployment benefits have been enrolled automatically since the end of 2024.

Decree-Law no. 159/2025 gives SIISL a more central role in active labour market policies and employment incentives by making the platform part of the process for accessing contribution relief. Private-sector employers that want to claim relief on new hires must, before or at the same time as the employment relationship begins, publicise the position by posting a job listing on SIISL.

In this sense, publishing job offers is not merely a way to provide information. It is also set to become a condition for accessing hiring relief, as part of a recruitment process that can be tracked and verified by the competent authorities, in line with the broader aim of making active labour market policies more robust.

In Message no. 1153 of 31 March 2026, INPS clarified that, for the time being, these provisions apply only on a trial basis. Use of the system will become mandatory only if and when a further implementing decree is issued — and no such decree has yet been issued.

From 1 April 2026, companies and authorised intermediaries, including employment consultants, can also use SIISL on a trial basis to report the start of an employment relationship electronically, using the UNILAV form. They can also use the platform for any subsequent extensions, conversions or terminations.

Here too, the system is an alternative rather than a mandatory channel. The traditional regional systems remain fully operational. At least for now, SIISL is therefore an additional channel, not a replacement for the existing tools.

REMOTE WORK

REMOTE WORK: mandatory health and safety risk notice.

Important changes for companies using Italy's "smart working" arrangements — broadly, remote or hybrid work under a formal agreement — came into force on 7 April 2026, **significantly strengthening health and safety obligations.**

The main change concerns information about risks. Employers must provide employees working remotely, as well as the Workers' Safety Representative (Rappresentante dei Lavoratori per la Sicurezza, RLS), with a written notice clearly describing the general and specific risks connected with remote work. This notice must be provided at least once a year and updated if there are significant changes.

This obligation already existed under Italy's smart-working rules. The real change introduced by Law no. 34/2026 is that failure to provide the notice is now expressly subject to penalties.

Failure to comply may trigger penalties, including criminal penalties, ranging from two to four months' imprisonment to a fine of up to €7,403.96.

This change confirms an established principle: even when employees work remotely, responsibility for protecting their health and safety remains fully with the employer. Remote work is no longer simply a way of organising work. It is now part of the company's health and safety system, requiring closer attention, clear evidence of compliance and active worker involvement.

In light of these changes, companies should promptly check that the required notice is in place and adequate, and that they have evidence it has been provided to workers.

WORKPLACE INJURIES

Workplace injuries and returning to work: what changes under inail circular no. 17/2026.

In Circular no. 17 of 29 April 2026, INAIL clarified the rules on medical certification for workplace injuries and on returning to work after an injury.

The key clarification concerns when the worker can return. If the latest medical certificate sent to INAIL states that the injury-related absence runs until a certain date, the worker can return once that period has ended (the prognosis period). There is no need to wait for an additional “final” certificate confirming the end of the injury.

A final certificate can still be issued, but it is no longer a condition for returning to work at the end of the prognosis period. INAIL may issue one if the worker asks for it or if INAIL carries out its own medical and legal checks, including remotely by telemedicine.

If, however, the worker wants to return before the prognosis period ends, a medical certificate is required to bring the end date forward. This certificate may be issued by any doctor authorised to issue workplace injury certificates. Without it, the employer cannot allow the worker to return to work.

When the worker returns after an injury, health surveillance by the relevant physician — i.e. the company-appointed occupational physician — may still be required, depending on the worker’s duties and the company’s procedures, in order to assess fitness for the role.



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