CJI about PDA1 based on risk management platform called SIBILLA

Italy

GENERAL INFORMATION	
Name of the organisation	Istituto Nazionale di Previdenza Sociale - INPS
Type of organisation	Social Security Organisation
Address	Via Ciro il Grande 21, Rome, 00144, Italy
Web page	https://www.inps.it/it/it.html
Contact person	Name and surname: Lorenzo Campanella Job position: N/A E-mail: Lorenzo.campanella@inps.it
Topic of the good practice	Other
Geographical focus	Cross-country
Duration	4/1/2025 - ongoing
Summary of the good practice	INPS (the Italian National Institute for Social Security) has developed a Business Intelligence System, called SI.B.I.L.L.A., based on a data lake architecture that uses big data technologies to identify and combat social security fraud at the national level. The Business Intelligence System and its tools are continually evolving to enhance INPS' anti-fraud efforts in response to new fraud patterns. The primary tool developed within the SI.B.I.L.L.A. framework is the Employers' Compliance Dashboard. This tool was designed to identify and forecast potentially fraudulent activities at a central level. Additionally, it allows INPS regional offices to perform independent intelligence operations that take into account the unique characteristics of their respective regions. Analyzing data and company relationships helps to identify risks of contribution evasion, to understand organizational aspects of fraud, and to map company networks. The added value lies in visualizing at a glance all the key information regarding a company's behaviour, its interactions with INPS and other public bodies (i.e. Revenue National Agency), as well as all other companies linked for any reason. INPS is gradually enhancing SI.B.I.L.L.A. by incorporating additional data, to

identify potential fraud at both national and international levels.

A recent example of a practical application of the risk management platform involved PDA1 forms issued for workers posted from Italy to other Member States was integrated into the Business Intelligence System. The raw data from A1 forms provided by INPS in 2023 were analyzed, by cross-referencing the employer registration numbers of posting companies with primary data collected in the Employers' Compliance Dashboard. This cross-analysis identified numerous risk situations. Fraud inspectors conducted analysis of the highest-risk cases and identified one employer for social security and labour inspection. This employer, a temporary work agency headquartered in Poland with a permanent establishment in Italy, had posted approximately 300 workers to Belgium in 2023. These postings represented nearly 90% of its workforce. The fraud analysis revealed significant irregularities: the majority of the posted workers were not Italian citizens, and almost all of them had never worked in Italy before being hired by the company. What is particularly striking is that many of the foreign workers hired and posted abroad did not have a residence or domicile address in Italy and their Italian tax codes were issued precisely at the time of hiring and posting. In some cases, the tax code was even issued after the employment notification and after the application for the A1 document. INPS successfully extracted all information regarding workers posted to Belgium by the company over the past five years. INPS contacted ELA to seek support in setting up a concerted joint inspection (CJI) with Belgian social security and labour inspectors, in order to effectively address the issue from the host Member State's perspective and to ensure full compliance with EU regulations concerning the coordination of social security systems. An initial inspection was conducted in April 2025 at the Italian headquarters of the inspected company, identifying additional irregularities which are currently being addressed by Italian and Belgian inspectors (i.e. violation of salary standards and collective agreements, etc.). Further operations will follow and the results of the CJI will be available in the coming months. Meanwhile,

	INPS is working to implement the cross-analysis on a larger scale with the goal of formalizing this type of control.
OBJECTIVES AND ACTIVITIES	
Background/context What challenge, need or gap were you trying to solve or respond to? Why was this issue relevant or urgent in your context (sector, region, country)?	▶ INPS developed the SI.B.I.L.L.A. Business Intelligence System to address the growing complexity and sophistication of social security fraud at the national level. The challenge was to detect fraudulent employer behavior using advanced data analysis. The urgency of this issue stems from the need to protect the integrity of the Italian social security system and to ensure compliance with EU regulations, especially in the context of cross-border postings of workers. The integration of data from A1 forms revealed new fraud patterns that required immediate attention and coordinated inspection efforts.
Objectives What were the main goals of this practice (e.g. better compliance, faster processing, improved worker protection)? (Please limit to three) Who or what were these goals intended to help or change? (Please limit to three)	▶ Main goals: 1. To identify and prevent social security fraud through advanced data analysis. 2. To support targeted inspections by providing risk-based intelligence. 3. To enhance cross-border cooperation in fraud detection and enforcement. Intended impact: 1. Improve the effectiveness of labour and social security inspections. 2. Detect fraudulent posting practices and contribution evasion. 3. Strengthen institutional coordination between Member States.
Main activities What were the main steps or actions you carried out to put the practice into effect? Were any tools, materials, partnerships, or processes created?	▶ The practice involved the development and continuous enhancement of the SI.B.I.L.L.A. system, particularly the Employers' Compliance Dashboard. This tool was designed to identify and forecast potentially fraudulent activities at a central level. Additionally, it allows INPS regional offices to perform independent intelligence operations that take into account the unique characteristics of their respective regions. A key activity was the integration of data from PDA1 forms into the

	system, followed by cross-analysis with employer registration data. This led to the identification of a high-risk employer and the initiation of a concerted joint inspection (CJI) with Belgian authorities. The first inspection took place in April 2025, uncovering further irregularities.
Funding/organisational resources	The development and implementation of the SI.B.I.L.L.A. platform, including all its dashboards, has been co-financed by the European Union. More specifically, 75% of the funding comes from the PON Legalità and the PN Sicurezza per la Legalità programmes, both of which are largely supported by the European structural funds, namely the European Social Fund and the European Regional Development Fund.
PARTICIPATION	
Stakeholders involved Organisations or entities actively contributing to the design, implementation, monitoring, or support of the good practice (e.g. labour inspectorates, social security institutions, trade unions, employers' associations, or other).	▶ The key stakeholders include: • Belgian social security and labour inspection authorities • Italian National Labour Inspectorate
Target groups Main groups or categories that the practice is directly aimed at, who should receive its services or who engage with it (e.g. employers, mobile or posted workers, labour inspectors and social security officers, or other).	▶ The key target group of the good practice are: • employers involved in the posting of workers abroad • social security and labour inspectors
Final beneficiaries Individuals or groups that ultimately benefit from the outcomes of the practice, even if they are not the direct target or user (e.g. mobile or posted workers, vulnerable workers at risk of exploitation, employers benefiting from clearer rules or reduced admin burdens, or other).	▶ The final beneficiaries of the good practice are: • posted and mobile workers ▶ social security system of the country where fraudulent practices are detected
GOOD PRACTICE CRITERIA	

Achievements and outcomes What specific results did the practice achieve? (e.g. How many workers or employers were reached, number of publications created? What processes became faster?) What kind of broader benefits did it bring? (e.g. Did it improve understanding of rights and obligations, enhance cooperation between authorities, or reduce legal uncertainty and inconsistent application of rules?)	▶ The practice led to the identification of a high-risk employer posting nearly 300 workers to Belgium. INPS successfully extracted five years of posting data and initiated a joint inspection with Belgian authorities. The April 2025 inspection revealed violations of salary standards and collective agreements. In total, 690 workers were involved in the inspection, and INPS inspectors identified 1,112 A1 forms that were deemed non-compliant with applicable regulations.
Cost effectiveness How did you keep costs low while still achieving results? (e.g. Did you reuse existing tools, automate processes, or share resources across teams?) Can you show that the outcomes were worth the investment? (e.g. Did small changes lead to big improvements, or were expensive tools avoided?)	▶ The initiative was cost-effective because it built upon existing infrastructure, the SI.B.I.L.L.A. system, and reused available data sources such as A1 forms and employer registration records.
Transferability What are the key features that make this practice work well? (e.g. a digital platform, clear guidelines, a joint inspection process, or strong coordination) What would another country or organisation need to make this work for them? (e.g. certain laws, IT systems, or staff training)	▶ Key features that make the practice effective include good IT and administrative capacity to implement a Business Intelligence System. To replicate this practice, other countries would need a similar IT infrastructure.
Sustainability **How is the practice sustainable from a social, financial or environmental perspective?** **What makes this practice able to continue over time? (e.g. It is now part of regular work or has been built into law or procedures?) and how are you making sure it lasts beyond the pilot or project phase?**	▶ The practice is sustainable because it is embedded in the INPS's ongoing digital and anti-fraud strategy. The SI.B.I.L.L.A. system is continuously evolving, with new data sources being integrated over time.
Innovativeness What makes this practice new or different in your field or country? (e.g. Is it the first of its kind, or does it combine actors who	▶ This practice is innovative because it applies big data technologies to social security fraud detection, which is not commonly used in this field. It combines employer behavior analysis with cross-border data to uncover

don't usually work together, or activities not performed before?) How does it improve older or less effective approaches? (e.g. By reaching more people, using data better, or simplifying complex procedures)	complex fraud schemes. The integration of PDA1 form data and the use of predictive analytics represent a significant advancement over traditional inspection methods.
Digitalisation What kind of digital tools or platforms were used in this practice? (e.g. online portals, automated case tracking, data sharing, digital databases or other) How did these tools help in reaching your goals? (e.g. Did they save time, facilitate access to data in real time, reduce errors, help detect fraud, or improve coordination between authorities?)	▶ The SI.B.I.L.L.A. system and its Employers' Compliance Dashboard are central digital tools used in this practice. The integration of A1 form data allowed cross-border fraud detection.