



Research handbook guiding comparative, interdisciplinary empirical data collection on migrants in irregular labour conditions

Deliverable D2.2 of the Horizon Europe DignityFIRM project



Authors

Pascal Beckers, Pyke Haans, Nijmegen School of Management, Department of Geography, Planning and Environment, Radboud University, the Netherlands

Els Rommes, Faculty of Social Sciences, Radboud Social Cultural Research, Radboud University, the Netherlands

Hanane Darhour, Siham Marroune, Faculty of Languages, Arts & Human Sciences, Ait Melloul Campus, University of Ibn Zohr, Morocco

Nora Gottlieb, School of Public Health, Bielefeld University, Germany

Sandra Mantu, Tesseltje de Lange, Centre for Migration Law, Faculty of Law, Radboud University, The Netherlands

Imanol Legarda Diaz-Aguado, Platform for International Cooperation on Undocumented Migrants (PICUM), Brussels, Belgium

Alberto Horst-Neidhardt, European Policy Center (EPC), Brussels, Belgium

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Introduction

(i) Information on the DignityFIRM project

This practical research handbook presents guidelines for empirical data collection aimed at international research consortia, building on insights from the Horizon Europe project DignityFIRM (2024-2026). The project investigates and seeks to improve conditions of migrants working in irregular conditions in the Farm2Fork sectors agriculture and meat processing, delivery and hospitality across Italy, the Netherlands, Germany, Poland, Spain, Morocco and Ukraine. Its innovative characteristic is that it adopts a ‘regulatory infrastructure’ approach, where laws and policies shaping irregularity in F2F sectors are treated not in isolation, but as interacting elements across four areas: i) migration management and mobility frameworks, as both non-EU and EU nationals can find themselves in a position of irregularity and may be subject to informal employment and/or irregular stay; ii) rules and policies relating to the European Pillar of Social Rights; iii) the EU’s F2F strategy, with a focus on social aspects of sustainability, and iv) employers’ obligations and corporate social responsibility (CSR).

(ii) The handbook: aims and objectives

The handbook presents a set of five guidelines for empirical data collection that have guided the work of the project and that have generated critical debate and reflectivity among the consortium throughout our research work on migrants working in irregular conditions. These guidelines are shared in the following five sections including some evaluative reflections on how these guidelines have served the project implementation. The five guidelines relate to: Comparative research (Section 1), European law and policy (Section 2), Gender & intersectionality (Section 3), Work-related health & social protection (Section 4), and Participatory action research (Section 5).

We hope the handbook will support implementation of future research projects with a similar thematic scope as DignityFIRM and, therefore, we address it to the broad research community and especially interdisciplinary research consortia. To help you benefit from these guidelines, each section discusses (i) the background to the guidelines for data collection, (ii) the actual guidelines for consortium partners to follow and, finally, (iii) our evaluation of how the guidelines helped streamline the DignityFIRM project.

1. Comparative Research Guidelines

(i) Background to the guidelines

This chapter presents and evaluates the comparative research design inherent to DignityFIRM, a large-scale, multi-scalar, multi-domain international project that brought together scholars from various social science disciplines, including law, sociology, gender studies, migration studies, anthropology, human geography, political science, public administration, public health and economics. The interdisciplinary nature of our consortium enabled us to address complex topics that cannot be adequately described through the lens of a single discipline and thus require the integration of insights from multiple comprehensive perspectives (Menken & Kestra, 2016), as highlighted in the [DignityFIRM comparative working papers](#). Therefore, comparative research guidelines have been an essential continuous point of attention in our monthly meetings (DignityLABs) for streamlining and supporting project implementation. We then discuss how these guidelines facilitated our multi-scalar and multi-domain approach, the selection of sectoral case studies in Farm2Fork industries, the mixed-methods research design and co-creative implementation, which safeguarded the alignment of processes and outputs of consortium members and supported inter- and transdisciplinary innovation among scholars.

Multi-scalar and multi-domain: The interactions of the stakeholder spheres

The comparative research design of DignityFIRM to analyse the legislative frameworks governing the conditions of migrants working in irregular conditions (IWMs hereafter) are scattered across various policy domains (Böcker & De Lange 2021; Mantu 2022). We identify four policy domains relevant to our study: Migration and mobility; Social rights, including labour and health; Farm2Fork strategy & sustainability; Business responsibilities, due diligence and corporate social responsibility. The laws and policies in these domains are highly debated, and dynamics of change are influenced by the (lack of) actions and lobbying of different stakeholders. Following our previous research, we identify five stakeholder spheres: the EU level, the national level, the local level, F2F employers, and IWMs (see figure 1 below). The regulatory infrastructure governing IWMs is investigated using a comprehensive comparative model across these stakeholders and intersecting policy domains, aimed at presenting solutions for socio-economic transformation. Following this step, we identified three types of interactions that are key to the project: interactions between the law field, the policy field, and non-state stakeholders. These interactions have been integral to the comparative research design.

Fig. 1: DignityFIRM's comprehensive comparative model connecting four key policy domains and five stakeholder spheres



(ii) Guidelines for consortium partners to follow

Sectoral case studies in the Fark2Fork industries

A key element of the project's comparative research guidelines concerns the selection criteria for the sectoral case studies as comparative units across the consortium countries to showcase the interactions of the above stakeholder spheres. The project is committed to studying irregular working conditions of migrants in the Farm2Fork industries in the EU context of Spain, Italy, Poland, Germany and the Netherlands, as well as in the context of non-EU countries of Ukraine and Morocco. The latter are included to learn from countries that form an integral part of the European Farm2Form chain of industries with highly interdependent trade flows.

With regard to the selection of suitable cases for comparison, the project opted for regional case studies of specific industry sectors within the Farm2Fork chain of industries, in such a way that each country covers one case study on the Farm side of the spectrum and one on the Fork side of the spectrum. The choice for these case studies was motivated by the following criteria that have pointed towards relevant units of analysis:

- prevalent knowledge gaps relating to these region-industry combinations in the scientific literature;
- particularities in sector-specific national and/or local legislation and/or policy;
- accessibility of the targeted group of research participants and sufficient numbers of migrants working in irregular employment conditions;
- Sufficient variability in migrant group regarding identity markers from different legal statuses'
- Contextual comparability of the case studies within the consortium.

Finally, given ethical considerations of not wanting to overburden relevant stakeholders with research participation (simultaneously to this project's implementation, two similar EU projects were implemented), certain regional sector case studies were not pursued. However, we do have to admit that the project has had a strong focus on the agriculture and food delivery sectors, which are also researched to a considerable extent by other initiatives. Ultimately, for comparability reasons, the project opted to focus on regional case studies in the Farm industries of agriculture and food processing and the Fork industries of food delivery and hospitality. Uniquely, for Morocco a regional case study of the fishing industry was added, given the high relevance of this non-EU industry in bilateral trade arrangements affecting the EU Farm2Fork chain. The Ukraine research team had to cope with the Russian war throughout the project. Their agricultural sector was therefore not a feasible sector to investigate. They focussed on the fork end: food delivery and informal food stalls.

Mixed methods research design

To effectively implement the comparative research design of the project, a rigorous, mixed-methods research design is required to gain a comparative understanding of the multi-scalar and multi-domain phenomena central in the research. We discussed the rigor, validity and triangulation of the comparative case study design, as well as the motivation behind the selection of all methods of data collection of the project.

Rigor, validity and triangulation

To ensure the validity and rigor of the research in the DignityFIRM project, transparency of methodological choices is key. Also, the interdisciplinary collaboration across research teams within DignityFIRM adds to the validity and rigor of the research. For instance, to gain a comprehensive understanding of employer preferences for regular or irregular migrant and native workers, disciplinary insights from legal studies, economics and sociology of work are essential. These are provided by the interdisciplinary team members working alongside each other on the research. Besides collaboration of disciplinary expert scholars, a part of the project is also engaging in 'Participatory Action Research', see guidelines in section 5. Here, migrants in irregular working conditions - in the role of peer-researchers - are in charge of

implementing research and empowerment actions as migrant community co-creation, making this an intimate part of the research process.

To increase the validity of the study, the DignityFIRM research design entails a number of processes, including triangulation. This is done by employing different ways of data collection (mixed methods, i.e., carefully integrating aspects of both qualitative and quantitative methods) and via collaboration of multiple researchers across different disciplines. Within DignityFIRM, research teams used different research methods, including: survey experiments, focus groups, document analysis, stakeholder & network mapping, expert interviews and complementary action-driven research.

Data collection

To effectively implement the project's rigorous, mixed methods research design, the combination of methods of data collection has been carefully crafted. The motivation behind the selection of all methods is provided below.

1) Targeted desk research, literature review and document analysis

The review of existing data is an essential component of data collection. The various documents that already exist in the context of irregular migration in the form of legal and policy documents, case law and of course scientific literature are an important source of context and history (Ravitch, 2020). As such, document analysis creates a foundation to advancing knowledge and facilitating theory development (Webster & Watson, 2002), as you can build on previous findings and perspectives. In the DignityFIRM project all work packages include some form of document analysis, targeted desk research or literature review to start out with. The existing data in these documents supplements the forms of data that the DignityFIRM consortium collects.

2) Interviews

DignityFIRM researchers conducted semi-structured interviews with experts and officials to gain a deeper understanding of the motivations and reality of governance of irregular migrants from different perspectives, including employers, law- and policymakers, NGOs and other stakeholders. More broadly, qualitative interviews are used to gain insight into the lived experiences of the participant, to understand how the participant makes sense of reality in relation to specific events and experiences and explore how the individuals' own experiences and perspectives relate to other participants' knowledge and perspectives. Qualitative interviews are the best choice here because they help make sense of the dense and contentious context of irregular migrant work.

Similarly, most case study partners undertook 15–20 semi-structured interviews with irregular migrants in each case study to understand how legal infrastructures work in practice as they understood and experienced it themselves. The goal was to reveal gaps between formal rights and rights in practice and spot potential biases in the implementation of policies and legal infrastructures. Semi-structured interviews allow for a deeper, holistic understanding of the lived experience of the interview participants and help contextualise the implementation of policies in the life of participants.

3) Focus Groups

Focus groups are well-suited for studies that want to understand and explore attitudes, opinions and experiences of specific groups and contexts. Focus groups also allow participants to comment and build on each other's responses to develop a deeper analysis and understanding of their common framework (Ravitch, 2020).

In the DignityFIRM project focus groups were set-up with professionals that provide assistance to migrants working in irregular conditions, to discuss from their roles which legal infrastructures hinder or facilitate their assistance to these migrants. As such, the focus group as a method of data collection is fitting to create a deeper understanding of the challenges faced in the participants' experience working with these migrants and to gain a deeper insight through the participatory analysis of participant experiences.

Next to this purpose, focus groups have also been implemented in this project to bring together sector-specific expert stakeholders (representatives of employer associations and labour unions, government officials, NGOs, academics) with a deep understanding of conditions affecting employers' preferences to hire formally or informally, natives or migrants. The combination of expertise brought in from these stakeholders has been instrumental to triangulate findings from the qualitative interviews, mapping and employer survey data (more on the latter below).

4) Mapping of stakeholders & networks

Stakeholder and network mapping is a useful tool to gather descriptive community or institutional data. And are strong in collecting contextual and baseline data (Ravitch, 2020). The outcome is understanding the institutional terrain of the research field. In DignityFIRM mapping of national stakeholders in the four policy domains is undertaken, as well as the mapping of regional/ local actors and networks. All case study partners mapped the national migration histories (past 5 years), legislation and policies, which was used as a basis for exploratory expert interviews, leading to forming the foundation for the research on crafting. Similarly, the mapping of the local/regional actors and networks serves, based on analysis of official documents, as a basis for the research on frames and practices. As such, mapping in

DignityFIRM serves the purpose of understanding the research field and sets the context for further data collections.

5) Employer survey: revealed preference experiments

A revealed preference experiment is a survey method that infers people's preferences from their actual choices or behaviors rather than from what they say they would do – as respondents are asked about real past decisions. The strength of the method is that it reflects real-world behavior, making results generally more reliable and less biased than purely hypothetical preference questions (Tipoe et al, 2022).

The revealed preference experiments during the DignityFIRM project were included in a large-scale online employer survey amongst employers and temp work agencies (including platform economy of food delivery sector) in the Netherlands, Poland, Italy and Spain. The goal was to yield a better understanding of the mechanisms of irregular employment from the perspective of employers. A survey with revealed preference experiments fits well here to reflect the real-world preferences and behaviour of employers.

6) Complementary action-driven research (PAR)

The action-driven research used in DignityFIRM is 'participatory action research' or PAR (see PAR guidelines in chapter 5). Participatory action research wherein the "subjects" (migrants in irregular working conditions in this case) are seen as active partners and not passive subjects. The aim is to avoid extractive dynamics in data collection.

For undocumented migrants specifically, they often face institutional exclusion and exploitation; traditional methods of data collection might seem risky to them. PAR as a data collection method allows them to articulate their needs and shape the research and participate in decision-making about the research. This makes PAR exceptionally well-suited to approach such a cautious and vulnerable group as migrants in irregular employment conditions in the Dignity FIRM project.

Co-creation within the consortium: reflections on the role of DignityLAB and co-writing

To foster the comparative approach in both process and output, the DignityLABS were organized by the Project Coordinator. DignityLABS are monthly sessions (mostly online) that involve all of the DignityFIRM consortium. Each session has a different theme, including sessions on the research methodologies, thematic presentations, preparation for midterm review, updates on field work and work packages. The thematic guidelines were also discussed during the DignityLABS, and formed the basis for this research handbook.

The DignityLABS facilitated members of the consortium to raise practical & theoretical issues, and exchange field experiences; ideas; and findings – streamlining & integrating the project implementation activities. Depending on the different setting, work package leaders and case study leaders could play a central role – enhancing the interdisciplinary character of the DignityFIRM project.

The aim of the DignityLABS approach is to inform the design of research and integrate the various elements of DignityFIRM's case studies. As the case studies in DignityFIRM are cutting across different domains, and as they use different research methods, the DignityLABS reintegrate these disparate working parts of the consortium to come together as a whole in the DignityFIRM working papers series.

In addition to DignityLAB meetings, the collaborative writing of comparative working papers generated by this project have been an important implementation tool for the comparative project design. The comparative working papers bring the data from these different cases together in one spot, and as such bring together findings from the different research methods and disciplines. These different angles of the research subject form the triangulation of the research design, leading to deeper insights across research methods and disciplines. The various working papers delivered by the consortium capture the following comparative dimensions:

- Cross-country diversity
 - Institutional/legal frameworks and policies (migration, social, f2f, CSR)
 - Structural conditions (economic structures, labour market mechanisms, welfare state features)
- Cross-sectoral diversity
 - Sector-specific dynamics in employment relations, market and supply-chain logic, legal- and policy context, stakeholder interests
- Regional diversity
 - Territorial distribution and presence of migrants working in irregular situations in the economy (e.g. rural vs. urban settings)
- Micro-level diversity
 - Diversity of target groups of migrants (identity markers, legal status, employment situations)
 - Employer size and other relevant characteristics
- Novelty / gaps in literature
 - Relevant thematic debates to advance the scientific and policy debates

Thus, in these working papers the different stakeholder spheres, policy domains and legal fields come together, as well as empirical material from the different case studies – which employed mix-method research methods.

Next to the project's working papers, several cross-national comparative reports are also relevant as a means of integrating the project's comparative insights from the three main parts of the analysis, namely:

- 1) **migrant workers' labour conditions**, in the same sector but in different countries and in different sectors in the same country and in different countries.
- 2) **actors' strategies and frames**, again comparing the actors' strategies in the same country and the same actors' strategies in different countries; and
- 3) **interaction process**, comparing how different actors interact differently in different sectors and countries and how this may lead to different outcomes in terms of migrants' labour conditions.

(iii) Evaluation of how the guidelines helped streamline the DignityFIRM project

To evaluate how helpful the project's comparative research guidelines have been for the streamlining of the project implementation, we revert to two evaluations of the DignityLABS, in which these guidelines have frequently been discussed. These evaluations were completed by all consortium partners mid-way and towards the end of the project (+/- 20 anonymous responses). These evaluations have indicated that the DignityLAB sessions were effective in guiding the comparative research design, secured the implementation of DignityFIRM guidelines and addressed theory and policy updates. The DignityLABS set-up and formulation of research guidelines can be recommended for future research consortium engaging in similar large-scale, interdisciplinary research initiatives. Participants perceive this method of collaboration as effective for fostering interdisciplinary exchange, discussion on theoretical and practical issues and the alignment of project deliverables.

2. Research guidelines on EU law

(i) Background to the guidelines: Integrating law into empirical research

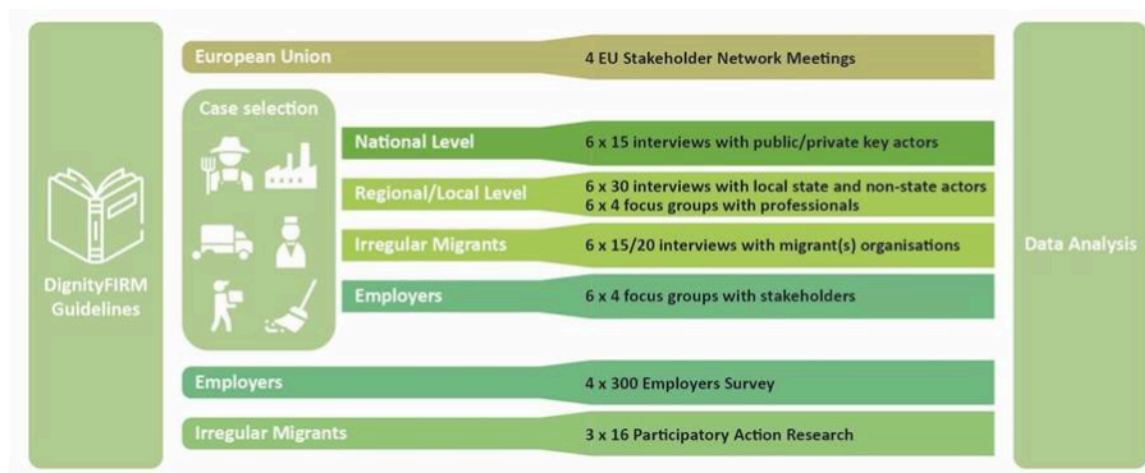
One of the project's aims is to identify gaps created by overlapping policy fields using different legal instruments with varying reach for relevant actors on the ground. Therefore, one of the project's starting outputs were research guidelines on EU law and policy to raise awareness of the potential of law and policy documents to impact the infrastructure that

shapes irregular migrant workers' access to rights and services. The project's national teams used the guidelines to design the questionnaires for collecting empirical data.

A challenge arising from this particular methodological approach is the need to engage researchers from diverse disciplines in recognising and considering the importance of law and legal instruments. Research undertaken in the DignityFIRM project shows that there is a growing mismatch between economic realities, labour market needs and migration policies in agri-food sectors which can be better understood when considering the role of (restrictive) laws and policies in creating barriers to employment, in fueling informal labour practices and in heightening the risk of exploitation (see [EPC Manifesto 3](#)). Where protective standards exist, ineffective implementation and weak enforcement add to the creation of significant gaps between legislation (at EU, national or local levels) and policies on paper and the reality of work in F2F sectors.

In this handbook-version of the DignityFIRM EU Law and Policy Guidelines we present the research design (see also figure 2 below) in four steps and explain in some detail what these steps entailed in our project, for use in future EU law and policy research projects.

Fig. 2: DignityFIRM mixed-methods research design (Phase I + Phase II)



(ii) Guidelines for consortium partners to follow

Research design

Step 1: Identify the relevant scales

Researchers are most familiar with their national contexts, so they tend to focus on national and local levels as relevant sites for policy formulation and analysis. Nonetheless, it is important to realize that all sectors examined in this project are affected by Europeanization. Methodologically, this requires capturing the EU’s growing influence on policy formulation and legislative instrument adoption since they influence national and local efforts.

The reach of Europeanization is influenced by the division of competences between the EU and its Member States. This division affects the protection of irregular migrant workers as the EU and its Member States share responsibilities in areas like migration, employment, and social rights. Moreover, it creates complex interactions between different levels of jurisdiction. For example, **migration policy** is a **shared competence**, meaning that both the EU and the Member States may legislate, but the Member States can only act when the EU has not already exercised its legislative authority. **Employment policy**, by contrast, remains primarily a **national competence**, although the EU increasingly sets minimum standards to address inequality and precarious working conditions across the Union.

While the EU's policy and legislative presence has expanded beyond migration, employment, and social rights as shown by recent developments concerning the introduction of social conditionality in CAP, significant gaps remain due to its limited competences and fragmented legislative landscape. The EU's mixed competences create inconsistencies and loopholes that particularly affect irregular migrant workers in F2F sectors. Sometimes national laws and policies operate alongside EU ones, adding to the complexity. The interplay between the EU, national and local levels is relevant for understanding why irregularity and vulnerability continue to characterize the experiences of migrant workers in F2F sectors despite the creation of important EU tools to protect such workers. The combination of shared competences, national discretion, limited enforcement, and policy fragmentation leads to uneven protection across Member States.

The gap between EU-level design and national-level practice is one of the major issues affecting the implementation of EU law relevant for migrant workers in F2F sectors.

Step 2: Identify the relevant legal frameworks

Central to the research design of the DignityFIRM project is the idea that multiple legal, economic, social and policy frameworks interact to produce irregularity and vulnerability. To understand and improve dignity and working conditions for migrant workers in F2F sectors requires looking beyond migration law alone. For example, the EU has expanded its role by introducing directives that set baseline protections for working conditions, the European Pillar of Social Rights, the European Labour Authority, and anti-discrimination legislation. EU action must comply with the EU Charter of Fundamental Rights, which applies to everyone, including undocumented workers, when EU law is implemented. The Court of Justice of the EU (CJEU) interpretation of these EU legal instruments expands protection to undocumented migrant workers and is mandatory for national and local authorities because of the primacy of EU law. Furthermore, EU policy relies on different types of legal instruments to achieve its goals, including regulations, directive, and soft law instruments (strategies, recommendations, etc.).

Reflecting the need to think beyond migration law, the project reviewed EU frameworks across four domains to show how each contributes to migrant workers' experiences: (1) migration management frameworks; (2) social rights and labour law; (3) EU Farm to Fork (F2F) Strategy, and (4) corporate social responsibility (CSR) and due diligence. For each domain, relevant instruments were mapped, and several were analysed in depth. Throughout the project regular [EU Policy updates](#) (9 in total) were provided to the team and published on the website, to inform of policy developments. These Updates were especially important because migration researchers, as said, do not necessarily follow EU policy developments

outside their field of expertise. Yet, awareness of the developments in the identified relevant legal frameworks is key to delivering useful policy recommendations.

The main conclusion was that the persistent siloing between policy fields operates as a major obstacle to effective implementation (see EPC final report). Migration law, labour law, agricultural policy, and internal-market rules are designed as if unrelated, and this fragmentation carries into their implementation. For example, labour inspectors may have mandates that inadvertently encourage reporting migrants to immigration authorities, which undermines labour enforcement. Similarly, agricultural instruments such as the CAP social conditionality mechanism are applied without adequate coordination with housing oversight, even though living conditions are a core component of dependency and vulnerability.

Table 1: Relevant legal domains, instruments, and findings

Domain	Instruments	In-depth analysis	Main findings
Migration law	1. Employers Sanctions Directive 2. Seasonal Workers Directive 3. Anti-Trafficking Directive 4. Victims' Rights Directive 5. Reception Conditions Directive 6. Single Permit Directive 7. Long-Term Residents Directive	1. Employers Sanctions Directive 2. Seasonal Workers Directive	These frameworks do <i>not</i> adequately protect (irregular) migrant workers. Many rights exist on paper but are inaccessible due to implementation gaps, fear of deportation, lack of information, or administrative obstacles.

<p>Social rights and labour law</p>	<ol style="list-style-type: none"> 1. Directive on health & safety at work 2. Directive on fixed-term & temporary Employment 3. Working Time directive 4. Temporary Agency Work directive 5. Directive on Adequate Minimum Wages 6. Directive on Transparent and Predictable Working Conditions 7. Directive on Platform Work (proposal) 	<p>Although most labour laws theoretically protect all workers, irregular migrant workers often cannot safely exercise these rights due to lack of firewalls, insecure residence, and employer dependency.</p>
<p>EU Farm to Fork (F2F) Strategy</p>	<ol style="list-style-type: none"> 1. EU strategy 2. CAP and social conditionality 	<p>While the strategy mentions seasonal workers and fair conditions, its social dimension focuses on farmers, not workers, and ignores irregular status altogether. Even new measures like CAP social conditionality remain voluntary in most states and benefit employers more than workers.</p>

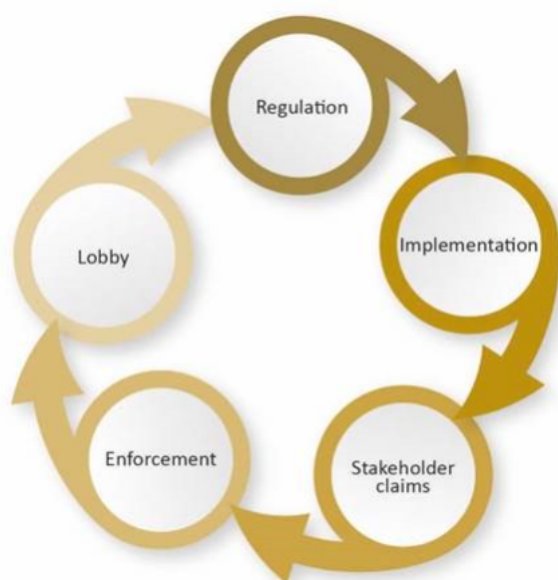
CSR and due diligence	<ol style="list-style-type: none"> 1. UN Guiding Principles 2. OECD-FAO Guidance 3. Corporate Sustainability Reporting Directive 4. Corporate Sustainability Due Diligence Directive (proposal) 5. Forced Labour Regulation (proposal) 		<p>Due diligence initiatives mainly target large companies, but most F2F employers are SMEs, so a major gap persists. Implementation and enforcement are still weak.</p>
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Step 3: Identify relevant questions

The legal mapping of the EU ‘regulatory infrastructure’ (see figure 3) was translated into practical questions for country teams to consider. The questions focused on identifying and understanding gaps and needs in relation to the four policy domains and to specific legal instruments. A questionnaire was designed reflecting the notion of a ‘legislative cycle’. The cycle starts from EU and national legislators’ choices, the norms put in practice, evidence leading to claims for enforcement and change, back to the legislators. The questionnaire reflects these different elements of the policy cycle with questions designed to gather information on i) structural barriers to access rights, ii) structural barriers to rights mobilisation (i.e., limited to no access to legal aid), and iii) the causes and consequences of these barriers for all identified stakeholders, not only irregular migrants.

Moreover, the questionnaire reflected the fact that migrant workers mostly do not have a direct democratic vote in the shaping of laws that govern their basic rights and access to services. They rely on others, such as NGO’s, labour unions, or legal aid providers to step up on their behalf. Questions were formulated about the roles of these actors as well as tried to identify judicial practices, where they exist.

Fig. 3: the legislative cycle



Step 4: Identify gaps and needs

Across all domains, the project identified systemic and interlinking gaps that require interventions across various actors and levels of jurisdiction. **Regulatory gaps** are linked to the fact that laws designed for migration control do not fit the reality of F2F labour markets. **Protection gaps** emerge because irregular migrants cannot safely report abuse without the risk of removal. **Implementation gaps** persist because complaint mechanisms exist in law but rarely work in practice. **Information gaps** affect both migrant who often do not know their rights and employers, especially SMEs that often do not know their obligations. Finally, **capacity gaps** occur because SMEs as employers may lack resources to comply with complex legal rules, unintentionally reinforcing informality. Because of the interlinked nature of these gaps, improvements require integrated reforms across migration, labour, social, agricultural, and corporate governance domains.

Overall, EU law implementation is constrained by limited administrative capacity, siloed policy design, dependency structures built into legal frameworks, weak reporting safeguards, inadequate monitoring, and national political priorities that diverge from EU objectives. The gap between formal rights and lived realities persists because implementation mechanisms are not sufficiently coherent, resourced, or insulated from competing policy logics. As a result, EU law often fails to meaningfully improve working and living conditions for migrant workers in high-pressure Farm-to-Fork sectors.

The DignityFIRM analysis reveals that migrant workers across Farm-to-Fork sectors face a set of deeply interconnected cross-sectoral challenges driven by fragmented and siloed governance, weak and uneven enforcement capacity, and structural dependency on employers and intermediaries. Slow, opaque, and mismatched legal recruitment channels push both employers and workers toward complex intermediation chains that diffuse accountability and heighten exploitation risks. At the same time, pervasive underreporting—linked to fear of retaliation, immigration enforcement, and insecure legal status—undermines the implementation of labour, social, and safety standards across agriculture, processing, and delivery work. These vulnerabilities are exacerbated by supply-chain cost pressures and a monitoring system that prioritises easily counted outputs over real-world outcomes, leaving key aspects such as housing, informal labour, and non-fatal risks largely invisible. Together, these cross-sectoral issues show that working and living conditions in the Farm-to-Fork economy cannot be sustainably improved without more coherent, better resourced, and genuinely cross-cutting EU and national governance.

(iii) Evaluation of how the guidelines helped streamline the DignityFIRM project

The purpose of these guidelines was to integrate a legal perspective into the empirical work of the DignityFIRM national teams and across the project to get a clearer and more comprehensive understanding of how legal and policy instruments impact the infrastructure that shapes irregular migrant workers' access to rights and services. The methodology used in DignityFIRM to investigate this specific regulatory infrastructure can be used in any research project concerning a reality covered by policy siloes that need understanding and bridging to address the issues at stake. Its advantage is that it required the national teams to collect empirical data that revealed a web of intersecting and overlapping legal and policy fields that participate in the governance of irregular migrant workers.

3. Gender & Intersectionality

(i) Background to the guidelines

In this section, several indicators and key questions are presented to review how intersectionality can be included in research methodologies. An intersectional analysis means to study the interconnection between, in this case, workers' identities and social categories (e.g. race, ethnicity, sex, religion, age and administrative status) and the inequalities they relate to. Which specific combination of interrelated characteristics and identities lead to privileges or (an accumulation of) disadvantages depends on the context. In the F2F labour market context, for instance, physical characteristics, and its interconnection with age,

able-bodiedness and sex, as well as the command of relevant languages has impact on workers' labour market position. Similarly, a focus on the position of irregularized migrants and regulatory framework centres the administrative and legal status as relevant for the experiences, rights and agency of workers.

In DignityFIRM, the choice was made to study regulations and policies at the EU, national and local level: we examined their effects, and ways employers and irregularized migrant workers deal with these legal frameworks. In this context, an intersectional lens means being aware of what and who is studied and which questions are used to do so, to ensure that relevant intersectionalities and their effects are captured. An analysis of laws and policies requires, for instance, not just paying attention to where texts explicitly mention intersectional identities but also analysing how seemingly neutral legal frameworks can work out differently for different groups and so lead to unintended inequalities. Moreover, it is important to not just study only immediately relevant legal frameworks, such as labour laws, but also adjoining policies and regulations that may influence the lives of migrant workers, such as policies related with pregnancy, housing or religious laws. And in the selection of workers to study it is relevant to select workers with relevant diversities.

We used various methods, such as large-scale surveys, legal and policy analysis, (focus group) interviews and participatory action research (PAR). Each method requires a different way of dealing with intersectionalities. In surveys, for instance, relevant variables need to be included, and the outcomes need to be calculated separately for relevant groups. In interviews and PAR, attention needs to be paid to power hierarchies between interviewer and those being interviewed, or to power hierarchies in group dynamics, which may lead to some perspectives being overlooked or prioritized. All in all, an intersectional lens means that attention is paid to where intersecting identities lead to inequalities, and needs to be used not just during the design of the methodology and the choice for specific methods, but also during the data collection process, analysis, interpretation and the presentation of findings.

(ii) Guidelines for consortium partners to follow

To ensure that an intersectional lens is applied throughout the entire project work, guidelines were formulated covering general overarching dimensions to be considered in the empirical data collection of all work, and more specific dimensions to be considered in some of the work to be completed. Table 2 below, presents the guiding dimensions, derived indicators and key questions that have been safeguarding the intersectional perspective throughout the implementation.

Table 2: Guiding dimensions, indicators and key questions ensuring an intersectional lens

Dimensions	Indicators	Key questions
<p>Cross-cutting dimensions across all project work: Decent work, Irregularity, Precariousness</p>	<p>Legal status & administrative status; socio-economic statuses (Gender, nationality, education, etc.); Conditions of work</p>	<p>How can policies urge employers to act fairly and ethically towards migrant workers, fomenting a culture of respect and equality in the workplace regardless of their status, gender, race, nationality, etc.?</p> <p>To what extent migrant workers resist their working conditions in response to the unfair treatment at work?</p> <p>Is equal treatment extended to IM workers with respect to protection of their human rights, and labour standards regardless of their legal, administrative or socio-economic status?</p> <p>What legal protection measures ensure equal treatment of migrant workers at work ?</p>

<p>Gender, Intersectionality, Occupational Health</p>	<p>Gender-responsive measures; Irregularity in migration status; Occupational health</p>	<p>Are there any policy measures to counter exploitative and abusive work relationships, violence, and harassment, including gender-based violence against migrant workers?</p> <p>What intersections of identity markers (legal, economic or social status markers) make irregular migrant workers more vulnerable and prey to exploitation and forced labour?</p> <p>Does the legislative framework on occupational safety and health provide protections to migrant workers?</p> <p>Which measures are available for diagnosis, prevention, care, rehabilitation and compensation of occupational diseases and injuries at work?</p>
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<p>Regulatory infrastructure at EU level</p>	<p>Patterns of irregularity at work; Discrimination on the basis of:</p> <ul style="list-style-type: none"> - Legal status - Administrative status - Gender - Nationality - Age <p>Implicit or explicit policies addressing migrant work in irregular conditions (IM work hereafter)</p> <ul style="list-style-type: none"> - Blind spots in policies 	<p>How do the seemingly neutral EU legal and policy frameworks co-create systemic intersectional discriminations and inequalities in precarious labour positions based on the intersection of migrant workers' administrative/legal status along with their gender, race, nationality, etc.?</p> <p>What effects can legislation have on categories of irregular migrant workers, such as seasonal workers with a long term status and others with a short term status and others with irregular status?</p> <p>What areas are left unregulated regarding migrant labour? How do these legal gaps intersect with issues of race, gender and immigration status? Which categories benefit from these regulatory oversights, and which rights remain undermined?</p> <p>Does EU Level Corporate Social Responsibility (CSR), through legal or moral obligations, offer a useful tool to enhance the protection of migrants working in irregular conditions (IWMs hereafter) irrespective of their status, gender, class, nationality, ethnicity, etc.?</p>
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<p>National regulatory infrastructure</p>	<p>General and Sector-specific policies addressing IM work (across the policy cycle):</p> <ul style="list-style-type: none"> -Agenda setting - Policy formulation - Policy implementation 	<p>To what extent intersectional inequalities are considered when setting the agenda on decent migrant work in F2F sectors?</p> <p>Do general and F2F sectoral public policies address the conditions and rights of (ir)regular migrant workers?</p> <p>Whose interests are taken into consideration in the general and sector specific public policies addressing IM work?</p> <p>Are these policies sensitive to the composite vulnerabilities of categories of irregular migrant workers, their gender, legal status, nationality, education, age, etc.?</p> <p>How do seemingly neutral national regulations and policies co-create (in practice) systemic intersectional discrimination and inequalities in precarious labour positions based on migrants' administrative/legal status, gender, race, nationality, etc.?</p>
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<p>Implementation of regulatory infrastructure at the local level (in practice)</p>	<p>Local governance structures; IM workers survival strategies</p>	<p>How do seemingly neutral practices in local governance structures co-create systemic intersectional discriminations and inequalities based on migrant’s administrative/legal status, gender, race, nationality, etc.?</p> <p>What socio-legal and economic identity markers make IM workers more prey to precariousness? Who are their allies?</p> <p>How would an intersectional approach to the inclusion of IM workers work out in practice? What strategies IM workers use to negotiate their entitlements to labour rights and social services?</p> <p>How do intersecting identities influence the work experiences of migrant workers?</p>
<p>Employer reliance on migrant labour</p>	<p>Employers identity and experience with migrant workers in irregular conditions</p>	<p>Why do employers rely on IWMs and which migrant workers are targeted in the low-skilled labour market?</p> <p>What function does intersectionality have in the enforcement of regulatory frameworks by employers?</p>

<p>Navigating the regulatory infrastructure by employers</p>	<p>The size of the enterprise (small enterprises tend to rely on informal labour)</p> <p>The number of IM workers involved</p>	<p>How do employers navigate the regulatory infrastructure to promote safer and healthier working environments considering the intersecting identities of their workforce? Which categories of IM workers are favoured and why? And in which sector there is an employers' dependence on IM workers?</p> <p>Would an employer with a migration background act differently than an employer without a migration background?</p> <p>How do intersecting social identities shape the implementation and effectiveness of workplace governance measures designed by employers, and what are the potential biases or gaps in these regulations?</p> <p>What categories of IM workers are favoured in franchises and independently owned enterprises?</p>
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<p>Irregular migrant mobilisations and agency</p> <p>Navigating the regulatory infrastructure by migrants</p>	<p>Individual forms of agency of IM workers vary with each one's status and intersectional identities</p> <p>Forms of IM workers organizing against precariousness and exploitation</p> <p>IM allies workers' and adversaries</p>	<p>What intersectional identity markers increase or decrease exposure to precarious F2F labour conditions?</p> <p>How do intersectional identity markers affect migrant worker's response and coping mechanisms with regards to labour precarity/irregularity?</p> <p>To what extent intersecting factors of seasonality and spatial workplace dynamics influence the experiences and treatment of IM workers, considering their diverse identities?</p> <p>How do IM workers, across their intersectional identities, organize themselves individually and collectively to stretch their entitlements and rights? Who are their adversaries and who are their allies?</p> <p>What coping mechanisms do IWMs use to challenge and change any neo-liberal, post-colonial, sexist and/ or racist discriminatory policies, practices, and cultural perceptions inflicted upon them?</p>
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<p>Dimensions related to dissemination, communication of projects results, impact</p>	<p>Inclusive and diverse dissemination of the project scientific publications, via the project’s website, social media and with conference participation</p>	<p>How does the dissemination of the projects’ activities and results cater for the needs of the population target, IM workers?</p> <p>Do the project dissemination activities and outputs reflect IM workers’ perspectives and expectations of the impact of the research?</p> <p>Do these activities help in changing the narrative about IM workers and improving their labour rights and entitlements?</p>
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(iii) Evaluation of how the guidelines helped streamline the DignityFIRM project

Although some of the researchers of DignityFIRM were inexperienced in analyzing intersectionalities, the guidelines and the tables we provided, as well as our feedback on the methods they proposed, ensured that intersectionalities were considered throughout the research project. We decided to focus mostly on three identities, of which we knew beforehand that they would be relevant. These were (ir)regularized employment status, sex, country of origin (including language). Researchers experienced in intersectional analysis contributed to several thematic working papers, national and comparative reports, which showcase that the intersectionality lens has been effectively incorporated into much of the project work.

4. Work-related health and social protection guidelines

(i) Background to the guidelines

Public health research has generated substantial evidence on health inequities affecting migrant populations. However, relatively little is known about how social inequalities – such as differential employment and working conditions – contribute to these inequities. Similarly, while a considerable body of conceptual and empirical research has examined the associations between work and health, migration has only been marginally considered within this literature. As a result, various questions concerning the interrelations between migration, work, and health remain unexplored.

Interdisciplinary projects such as DignityFIRM can contribute greatly to closing these gaps. Within such a project, public health offers a conceptual and analytical framework for integrating empirical insights across disciplines, and for developing policy-oriented outputs that are normatively grounded in equity, human rights and social justice. This section provides theoretical background and methodological guidance for integrating a health perspective into the empirical work of the DignityFIRM national teams and the across the project. We introduce key public health concepts in relation to DignityFIRM research, followed by a list of operational questions that can guide analyses of the interrelations between migration, work, and health.

What is public health?

Public health is the science and practice of promoting health, preventing ill health, and **reducing health inequities at the population level** (Bonita, Beaglehole & Kjellström 2006). To this end, it studies the distribution of health outcomes between and within populations, and of the risk factors and health assets influencing them. For instance, public health research might investigate

- **Differences in health outcomes** across worker populations, occupations, or over time. It would ask, e.g., to what extent people working in certain occupations have better/worse health outcomes compared to people working in other occupations? To what extent do some workers have better/worse health outcomes compared to others working in the same occupation? To what extent have health outcomes in a specific worker population improved/worsened over time?
- **Factors driving these differences.** Are differences in health outcomes associated, e.g., with exposures associated with a particular occupation? With risks associated with a particular identity marker (e.g., legal status, racialization, gender)? Or with changes in working conditions associated with a policy or contextual change (such as climate change, change in migration regime)?
- **Pathways and mechanisms that link the above said factors and health outcomes.** Here, questions would be, e.g., how do legal status, racialization, and gender shape work-related risks? How has a policy intervention or contextual change unfolded its effects on worker health?

Such analyses generate the evidential basis for interventions aimed toward better health for all; e.g., legal reforms, practice guidelines, development and application of technologies. Being focused on health inequities - i.e., inequalities that are systematic, avoidable, and thus deemed unfair (Braveman 2025) - and on political action and structural change as the “remedy”, public health is considered a social science (Mackenbach 2008). By the same token, it is inherently interdisciplinary and oriented toward normative principles of equity and social justice.

Occupational safety and health (OSH) is considered a separate discipline from public health that **focuses more narrowly on workplace safety and health**. **DignityFIRM adopts a public health rather than an OSH perspective** as it looks beyond the workplace, incorporating broader policy arenas such as migration and mobility, F2F, and corporate social responsibility.

What is health?

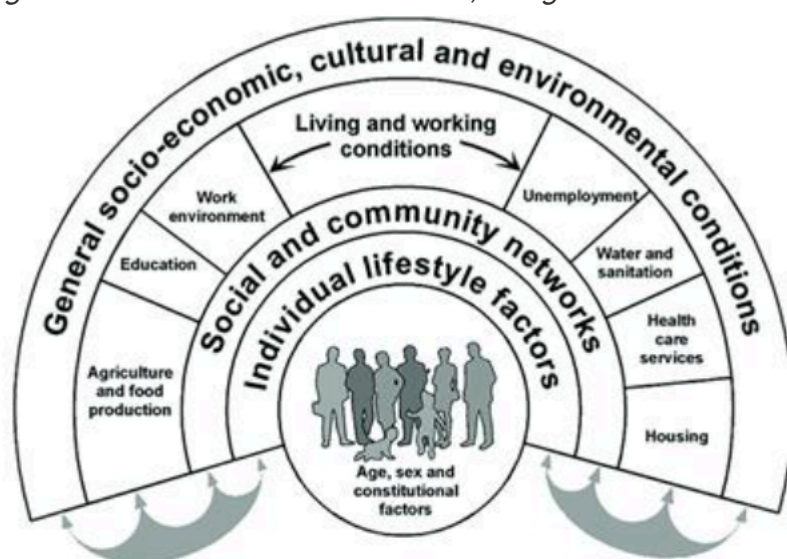
According to the World Health Organization (WHO), health is “**a state of complete physical, mental and social well-being** and not merely the absence of disease or infirmity.” (WHO 1948) The enjoyment of the highest attainable standard of health is broadly recognized as a **fundamental human right** under international law (see, e.g., UN CESCR 2000) and the EU Social Charter (Council of Europe 1996). It is thus also considered indispensable for exercising other human rights incl. mobility, education, work, social participation. In other words, health is both an end in itself and a means for people to fulfil their aspirations (Sen 1999).

Importantly, **health is not synonymous with healthcare**. While (access to) healthcare matters, its role for allowing people to live healthy lives is relatively minor within a broader interplay of social, economic, environmental, and political factors.

What are the social and structural determinants of health?

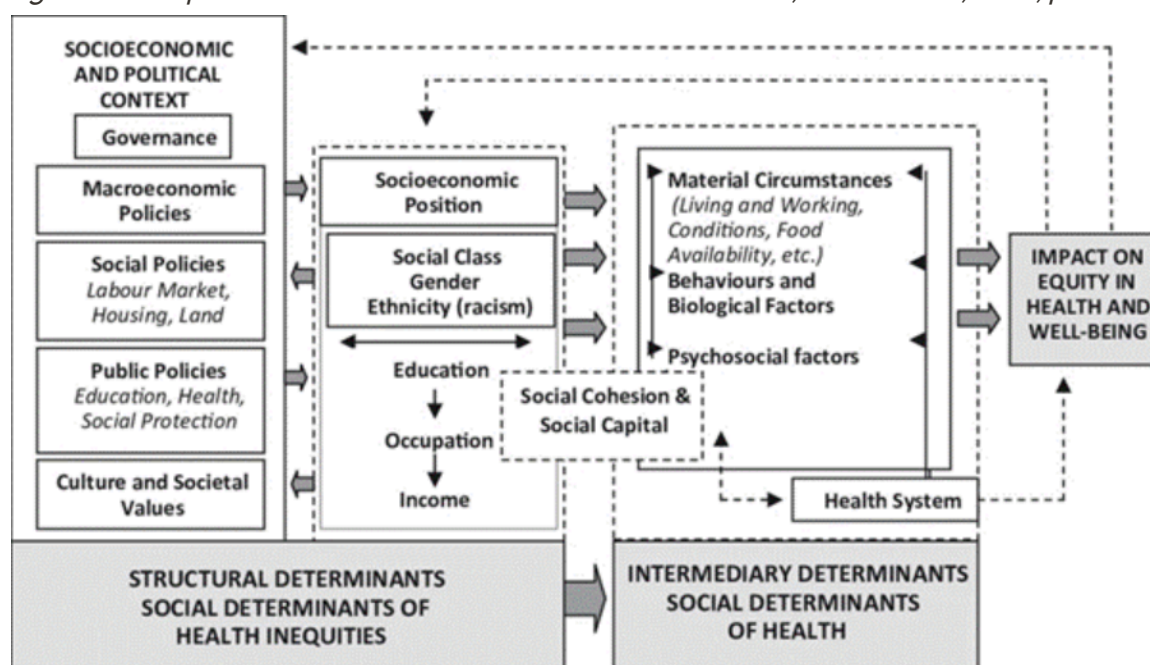
Public health emphasizes that **health outcomes interrelate with social, economic, environmental, and political conditions**. The Social Determinants of Health, e.g., are a key public health concept for systematizing the links between factors such as working conditions, agriculture and food systems, housing, social networks, and socio-economic conditions and health. Frameworks such as Dahlgren & Whitehead’s “Rainbow Model” (see figure 4) are intended to illustrate these links and facilitate intersectoral interventions (Dahlgren & Whitehead 2021).

Fig. 4: The main determinants of health, Dahlgren & Whitehead 2021, p. 22



The social determinants, in turn, are shaped by social, economic, and political structures. As the WHO Commission on the Social Determinants for Health noted: “The poor health of poor people, the social gradient in health within countries, and the substantial health inequities between countries are caused by the unequal distribution of power, income, goods, and services, globally and nationally, the consequent unfairness in the immediate, visible circumstances of people’s lives - their access to health care and education, their conditions of work and leisure, their homes, communities, towns, or cities - and their chances of leading a flourishing life. This **unequal distribution of health-damaging experiences is not in any sense a natural phenomenon but is the result of a combination of poor social policies and programmes, unfair economic arrangements, and bad politics.**” (Marmot et al. 2008, p. 1661) The public health literature relates to such factors e.g. as “structural determinants of health” (see figure 5).

Fig. 5: A conceptual framework of social determinants of health, Solar & Irwin, 2010, p.6



These models underscore the relevance of labour markets, immigration regimes, food system governance, and racism and social exclusion for public health. Public health research treats these aspects as determinants of health, with **health equity as a central outcome measure through which social conditions and inequalities become manifest**.

(ii) Guidelines for consortium partners to follow: Topics, questions and indicators

This section proposes a non-exhaustive list of public health-related topics, questions, and example measures that operationalize the interrelations between migration, work, and health (see table 3). These items are organized according to different policy domains and stakeholder spheres addressed by the DignityFIRM consortium partners (left-most column). The topics (second column from the left) distinguish between occupational exposure and occupational risks. The former term refers to being in contact with a work-related hazard; whereas the latter captures a person's interaction with that hazard, including their capacity to avoid, mitigate or manage it, and thus the likelihood that exposure results in an adverse health outcome. The questions and example measures (third and right-most columns) provide illustrative examples of how these topics can be approached and assessed in empirical research. They are merely suggestions and do not constitute the outcome of a systematic and validated indicator development process.

Table 3: Relevant topics, questions and example measures

Topics	Questions; e.g.	Example measures
Occupational exposure	<ul style="list-style-type: none"> • How do different social status markers direct migrants to certain high-risk industries and jobs? 	<ul style="list-style-type: none"> • % of migrant workers • Socio-demographic characteristics of migrant workers, incl. gender • Access to the formal labour market for migrants (f/m/d)? • Job characteristics; e.g. pay, formal skill & language requirements, prestige? • Main hazards, by gender (e.g., considering sexual and gender-based violence, differential susceptibility to chemical hazards)?
Occupational risk	<ul style="list-style-type: none"> • How do different social status markers intersect in shaping work-related risks? How do they shape migrants' means to avoid, mitigate, or manage hazards at work? 	<ul style="list-style-type: none"> • % of migrant workers with a work-related injury, by gender • % of migrant workers with a work-related illness, by gender • % of migrant workers with a work-related disability, by gender • Self-rated health, by gender • % of migrant workers with employer-provided protective gear • % of migrant workers who received safety training in their language • Pressures to prioritise speed over safety (e.g., per piece payment)? • Safety culture? Normalization of hazards such as heavy loads, extreme climatic conditions? • Workplace hierarchies & civility (e.g. verbal violence)?

<p>Social & health protection</p>	<ul style="list-style-type: none"> • Are migrant workers included in public health insurance? • Does their health insurance cover essential services, e.g. reproductive health, chronic disease management? • Are they included in social security schemes? Which ones (e.g., sick leave, parental leave, disability/old age pension)? • What criteria condition access to social security and health insurance (e.g., permanent residence status, employment)? 	<ul style="list-style-type: none"> • % of migrant workers with public/private health insurance • Coverage of migrant worker health insurance policies • Utilization of charitable healthcare provision (e.g., civil society-run clinics) by insured/ uninsured migrant workers? • Social benefit claims made by/paid to migrant workers • Health coverage claims made by/ paid to migrant workers • Employment- or employer-tied insurance schemes? • What social protection is available for migrant workers during pregnancy, postpartum, and with childcare responsibilities?
<p>Sources of support & power</p>	<ul style="list-style-type: none"> • Do migrant workers have access to a safe complaint mechanism? • Do unions engage with/on behalf of migrant workers? • Do civil society organizations or home country governments engage with/on 	<ul style="list-style-type: none"> • Ombudsman for gender issues? • Number of received complaints/ year? • Number of follow-up inspections and fines? • Data exchange with immigration authorities? • Activities of unions tailored to migrant workers? • Legal counselling, assistance, advocacy? Active consular presence?

	behalf of migrant workers?	
Data & visibility	<ul style="list-style-type: none"> Are data on migrant workers' occupational health available, accessible and of sound quality? 	<ul style="list-style-type: none"> Are migrant workers included in routine health monitoring and surveillance? Are data collected on/statistics disaggregated by gender, citizenship, legal status?
Occupational exposure	<ul style="list-style-type: none"> What EU level factors drive the concentration of migrant workers in high-risk industries? 	<ul style="list-style-type: none"> How do EU regulations relate to sectoral reliance on migrant labour? How do EU migration & mobility policies enable/restrict labour migration?
Occupational risk	<ul style="list-style-type: none"> How do EU regulations shape working conditions and occupational safety & health (OSH)? 	<ul style="list-style-type: none"> EU regulations on labour rights, employer duties, and OSH generally? ...in specific settings; e.g. industries, employment arrangements (posting, platform work)? EU regulations on diversity-accommodating implementation of labour rights and OSH; e.g. consideration of linguistic diversity, gender?
Social & health protection	<ul style="list-style-type: none"> How is migrant workers' social and health insurance regulated at EU level? 	<ul style="list-style-type: none"> EU regulations on social and health insurance coverage for migrant workers? Cross-border and transnational social protection schemes (such as European Health Insurance)? EU regulation of private insurance policies for migrant workers?

Sources of power & support	<ul style="list-style-type: none"> To what extent do EU regulations facilitate safe claims to labour rights and social protection? 	<ul style="list-style-type: none"> EU regulations on data protection (e.g., data protection, protection from deportation during legal action)?
Data & visibility	<ul style="list-style-type: none"> Are data on migration, work, and health collected? What is the role of data in EU policymaking? 	<ul style="list-style-type: none"> Availability of occupational health data, by citizenship, migration status, employment arrangement, gender Use of data in bills, parliamentary questions
Occupational exposure	<ul style="list-style-type: none"> What factors drive the concentration of migrant workers in certain high-risk industries/jobs in the particular national context? What are the typical employment arrangements (e.g. seasonal, subcontracted, platform work, informal, direct full-time hire)? What are typical hazards in the industry/ job in question? 	<ul style="list-style-type: none"> % of migrant workers National regulations re: migrants' access to the labour market (e.g. bilateral agreements; work bans)? Job characteristics; e.g. pay, formal skill level, language requirements, manual labour, main hazards? Discourses re: work shortages, migration, social systems? Who are the main actors (incl. interests, interrelations, sources of power)?
Occupational risk	<ul style="list-style-type: none"> How does their migration/ legal status shape migrants' 	<ul style="list-style-type: none"> % of workers with a work-related injury in the respective occupation % of migrant workers with a work-related illness

	<p>work-related risk in the particular national context?</p> <ul style="list-style-type: none"> Who is responsible for implementing, monitoring, and enforcing OSH at the local/national level? 	<ul style="list-style-type: none"> Sickness/Disability labour exit rate Are residence rights employment- or employer-tied (i.e., legal status dependent on continuous employment or on continuous employment by the same employer)? Number of OSH inspections per company/year?
Social & health protection	<ul style="list-style-type: none"> Are migrant workers eligible for public health insurance? Are migrant workers included in social security schemes? Which ones? 	<ul style="list-style-type: none"> Type of social and health insurance system (e.g., national/social ins.)? What criteria condition access to social security and health insurance (e.g., permanent residence status, employment)? % of migrant workers with public/private health insurance Coverage of migrant worker health insurance policies Social benefit claims made by/paid to migrant workers, by type: e.g., sick leave, parental leave, disability pension, old age pension Health coverage claims made by/paid to migrant workers Discourses re: migrants' deservingness for social and health protection
Sources of power & support	<ul style="list-style-type: none"> Consideration of migrant workers' health needs by political, industrial, and civil society actors, incl. unions? 	<ul style="list-style-type: none"> Bills, parliamentary hearings, campaigns related to migrant workers' health needs? How do different actors interrelate (alliances, opposition, conflicts)?
Data &	<ul style="list-style-type: none"> Are national data on 	<ul style="list-style-type: none"> National statistics on occupational

<p>visibility</p>	<p>migration, work, and health available?</p> <ul style="list-style-type: none"> • What is the role of data and evidence in national policymaking? • Media narratives re: migrant workers and their conditions? 	<p>health, by industry, citizenship/migration status, employment arrangement?</p> <ul style="list-style-type: none"> • How are data used in political debates and policymaking? By whom? • How are migrant workers and their conditions presented in the media?
<p>Occupational exposure</p>	<ul style="list-style-type: none"> • What are the typical employment arrangements in the context of the selected case-study? • What are typical working conditions? • What are the main hazards in the industry/ job in question? 	<ul style="list-style-type: none"> • % of migrant workers • % of migrant workers in non-standard employment (e.g., seasonal, subcontracted, platform work, informal) • Job characteristics; e.g., pay, formal skill level, manual labour • Physical hazards (e.g., heat, falls, cuts, noise, heavy loads, forced positions) • Biological/Chemical hazards (e.g., dust, pesticides, detergents) • Psychosocial hazards (e.g., job insecurity, time pressure, workplace violence, long/unusual work hours)
<p>Occupational risk</p>	<ul style="list-style-type: none"> • How does their migration/ legal status shape migrants' work-related risks (i.e., their means to avoid, manage, or mitigate hazards) in the context of the particular 	<ul style="list-style-type: none"> • % of migrant workers with employer-provided protective gear • % of migrant workers who received safety training in their language • Cases of migrant workers with a work-related injury or illness • Cases of migrant workers with a work-related longterm health issue or disability

	<p>case-study?</p> <ul style="list-style-type: none"> • Are migrant workers included in OSH measures? • Can workers demand better protection at work? • Is there an independent agency mandated to monitor and enforce OSH? 	<ul style="list-style-type: none"> • What typically happens if a migrant worker highlights a work hazard or demands protective measures? • Cases of employer reprisal? • Who monitors and enforces labour rights and OSH? • Data exchange with immigration enforcement?
Social & health protection	<ul style="list-style-type: none"> • Do migrant workers have access to healthcare? • Do migrant workers have access to social security? 	<ul style="list-style-type: none"> • % of workers with public/ private health insurance • What typically happens if a migrant worker gets injured or ill on the job? • What typically happens if a migrant worker cannot work for > 2 weeks due to ill health?
Sources of power & support	<ul style="list-style-type: none"> • Do workers have access to a safe and effective complaint mechanism? • To what extent are migrant workers organized or represented by works councils or unions? 	<ul style="list-style-type: none"> • Number of OSH complaints received/ followed-up? • % of migrant workers in works councils and unions • Mobilisations and frames around migrant workers' safety & health? around migrant workers' social and health protection?
Data & visibility	<ul style="list-style-type: none"> • To what extent are worksites, migrant workers, and working conditions under public 	<ul style="list-style-type: none"> • Media storms around cases of labour and human rights violations? • Framings of migrant workers' claims for/deservingness for social

	scrutiny?	and health protection?
Occupational exposure	<ul style="list-style-type: none"> • How do the working conditions (incl. hazards) influence the labour supply? • What arrangements are possible to recruit and employ labour migrants? • What are the consequences and costs for employers? 	<ul style="list-style-type: none"> • Labour shortages (constant, seasonal) • Labour turnover • Health-related absenteeism rate • Health-related exit rate • % of migrant workers • % of workers in non-standard employment (e.g., seasonal, subcontracted, platform work, informal) • What is the perceived cost/benefit of different OSH measures, in the given context? (e.g., provision of protective gear; ensuring of adequate rest times; provision of shade and water supply; safety trainings in different languages and under conditions of high turnover; safeguards for machinery) • % of inspections per company/ year, level of fines • Safety culture, normalization of risk and injury?
Occupational risk	<ul style="list-style-type: none"> • What are the employers' duties, costs, benefits, and risks in (not) implementing safety and health measures? 	<ul style="list-style-type: none"> • Legal duties and related costs, e.g., social and health insurance contributions/ full-time worker
Social & health protection	<ul style="list-style-type: none"> • What are the employers' duties, costs, benefits, and 	<ul style="list-style-type: none"> • Costs of private medical services • % of migrant workers with employer-sponsored health

	<p>risks in (not) providing migrant workers' social and health insurance?</p>	<p>insurance</p> <ul style="list-style-type: none"> • % of inspections per company/year, level of fines
<p>Sources of power & support</p>	<ul style="list-style-type: none"> • Employer-worker relations • To what extent are migrant workers' interests represented and organized? 	<ul style="list-style-type: none"> • What leverage do employers have over workers (e.g., employer-tied visa)? • Level of unionization and/or representation of migrant workers by works councils
<p>Data & visibility</p>	<ul style="list-style-type: none"> • To what extent are worksites, migrant workers, and working conditions under public scrutiny? 	<ul style="list-style-type: none"> • To what extent are worksites and workers, e.g., visible? Or remote and (spatially, socially) secluded? • Media storms about migrant worker conditions?
<p>Occupational exposure</p>	<ul style="list-style-type: none"> • What makes certain high-risk industries/jobs particularly accessible for migrants? • What are the typical employment arrangements (e.g. seasonal, subcontracted, platform work, informal, direct full-time hire)? • What are typical hazards in the industry/ job in question? 	<ul style="list-style-type: none"> • Who typically works in this job? • How do people typically arrive at this job? • Do workers typically have a written work contract? • How do workers get paid (per hour, per piece, monthly salary, in cash)? • What is the job like? (E.g. physically challenging? extreme climatic conditions, noise, chemicals, dangerous equipment? Time pressure, verbal abuse?)

<p>Occupational risk</p>	<ul style="list-style-type: none"> • What is workers' perception of and response to occupational risks? • Who takes responsibility for OSH? • Are migrant workers included in OSH measures at the worksite? • Do OSH measures consider migrant workers' needs? 	<ul style="list-style-type: none"> • How frequent is it that people get sick or injured on the job? • To what extent does your job jeopardize your health? • What do you do to protect yourself? • Does your employer provide protective gear? • Can you ask your employer for better protection; e.g., protective gear, safeguards, rest times? • Who is your employer? • Did you get instructions on how to stay safe? From whom? In what language?
<p>Social & health protection</p>	<ul style="list-style-type: none"> • Do migrant workers have access to healthcare? • Do they have access to social security benefits? 	<ul style="list-style-type: none"> • Do you have health insurance? Who purchased/paid for it? • Has it happened to you that you needed to see a doctor, but you didn't? Why? • What happens if you get sick? Do you continue working/ staying home? Will you lose income/your job? • What happens if someone has a bad accident at work? Who covers the bill? Do they lose income? Do they keep their job? What if they are left with some lasting health issue? • What happens if a worker is pregnant/has a baby?
<p>Sources of power & support</p>	<ul style="list-style-type: none"> • Do workers have a safe complaint mechanism? • To what extent are 	<ul style="list-style-type: none"> • If there is a problem at work (e.g., an acute danger, or harassment) – would workers typically report it or file a complaint?

	<p>migrant workers' interests organized or represented?</p> <ul style="list-style-type: none"> • Which institutions support migrant workers? 	<ul style="list-style-type: none"> • What would keep them from reporting a problem? • Is there a works council or a union for you and your co-workers? • Are you a member of a union? • Where else could you turn to for help, e.g., if you have trouble with your boss (e.g., unions, NGOs, churches, consulates, migrant communities)?
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(iii) Evaluation of how the guidelines helped streamline the DignityFIRM project

The purpose of these guidelines was to integrate a public health perspective into the empirical work of the DignityFIRM national teams and across the project as a whole. Over the course of the project, the guidelines and the collaborative engagement among the partners contributed to a clearer and more comprehensive understanding of public health within the consortium, extending beyond a narrow focus on healthcare access or infectious disease management. This broader conceptualisation helped highlight intersections between the consortium partners' work and public health research, thereby deepening inter- and transdisciplinary collaboration.

The degree to which a public health perspective could eventually be integrated varied across research activities and contexts. In some cases, integration occurred organically; e.g., where study participants themselves raised questions related to worker health, or where migrant workers' social and health rights were already central to the research focus. In other cases, integration was more limited; e.g., if a selected local case-study was not directly concerned with worker health. Here, only selected example measures were incorporated into the empirical data collection. This uneven integration of health-related questions and measures arguably constrained systematic comparative analyses, and it necessitated additional bilateral consultations and desk research to support cross-national and cross-sectoral comparisons. Despite these variations, the guidelines proved useful in enabling the public health task leader to systematically identify and extract health-relevant information from the diverse datasets generated by the country teams. This process facilitated the production of several public health-oriented outputs, incl. policy recommendations and directions for future research. Taken together, the experiences affirm the added value of a public health perspective as an integrative framework capable of bridging disciplinary boundaries and

policy domains. Applying a public health perspective thus allowed the consortium to capitalise on empirical findings across disciplines. By treating work-related health inequities both as an outcome in their own right, and as an analytical lens through which to understand labour markets, migration dynamics, and food system governance, this perspective enriched the DignityFIRM research and generated nuanced insights that foreground migrant workers' lived realities, needs, and rights.

In summary, a public health approach proved well-suited to an interdisciplinary project like DignityFIRM precisely because of its defining characteristics: it is inherently interdisciplinary and intersectoral, linking migration, work, and health; it is normatively grounded in equity, human rights, and social justice; and it is practice- and action-oriented, directed toward the formulation of policy recommendations and development of interventions to advance health for all.

5. Participatory Action Research guidelines

(i) Background to the guidelines: Introduction and Purpose of the Guidelines

This is a summary of the guidelines that were developed within the DignityFIRM project, which examines the living and working conditions of undocumented and irregularly employed migrant workers, particularly in sectors such as agriculture, food supply chains, hospitality, and related precarious forms of labour. Participatory Action Research (PAR) was selected as a central methodological approach for Work Package 7 (WP7). The guidelines were initially drafted in 2023, then revised in 2026 after PAR had been applied in three field sites: Amsterdam (Netherlands), Seville (Spain), and Wroclaw (Poland). The revision incorporates feedback, practical lessons, and reflections from grassroots organisations, migrant-led groups, and researchers. (Legarda Diaz-Aguado I., 2026)

PAR is positioned as an approach that treats undocumented migrants as **active partners**, not as passive “subjects.” Unlike traditional research that may unintentionally reproduce extractive dynamics, PAR emphasises collaboration, co-creation of knowledge, and action leading to social transformation. Because undocumented migrants often face exploitation, discrimination, fear of authorities, and institutional exclusion; approaches that allow them to articulate their needs, shape the research, and participate in decisionmaking help counteract the structural invisibility they experience.

Contributions from migrant-focused and migrant-led organisations across Europe, including groups in Belgium, Germany, Greece, Czech Republic, Spain, and the Netherlands, –were

crucial to shaping these guidelines. These organisations brought practical perspectives on both the potentials and the pitfalls of participatory research with undocumented populations, especially regarding trust, representation, and ethics.

Overall, the purpose of the document is to help researchers, NGOs, and community organisations employ PAR in ways that are ethical, realistic, empowering, and sensitive to the complexities of undocumented migrants' lived experiences and incorporate relevant reflections to keep in mind for any engagement with undocumented migrants in academia.

Conceptual Foundations, Origins, and Critiques of PAR

Participatory Action Research is described as an approach where oppressed or marginalised groups participate directly in defining research questions, collecting and analysing information, and generating solutions with the intention of political and social change. The document identifies three core elements of PAR:

1. **Ideological Position** – PAR explicitly aligns itself with oppressed or marginalised groups, acknowledging the political and structural nature of their conditions rather than treating them neutrally.
2. **Recognition of Agency and Knowledge** – Lived experience, practical understanding, and community-based knowledge are valued equally to academic knowledge.
3. **Action Orientation** – Research must lead toward transformation, not simply description or analysis.

PAR emerged from Kurt Lewin's 1940s action research and was significantly shaped by Marja-Liisa Swantz and Orlando Fals Borda. It has been expanded by scholars such as Freire and others working on decolonial, feminist, and community-based methodologies. Its evolution is tied to resistance against extractive academic practices that treat communities merely as sources of data.

The guidelines emphasise that while PAR can be powerful, it is also demanding and frequently criticised or misunderstood. Common critiques include:

- **Representativeness concerns** – some question whether a small group of participants can represent a broader community. The guidelines point out that such critiques often reflect biases, failing to recognise the legitimacy of experiential knowledge.
- **Institutional constraints** – academic structures, funding rules, and rigid timelines often conflict with the flexibility and long-term commitment that PAR requires.

- **Misuse of participatory terminology** – some projects adopt the language of participation without actually transferring decision-making power, leading to superficial or tokenistic involvement.
- **Intersectionality challenges** – if internal inequalities are ignored, participation may privilege the more vocal, visible, or less marginalised individuals and reproduce internal hierarchies.

PAR's transformative potential depends on carefully navigating these critiques and maintaining genuine commitment, flexibility, and reflexivity throughout the process.

Working with Undocumented Migrants: Barriers, Trust, and Practical Realities

Undocumented migrants face unique vulnerabilities that profoundly influence their ability to participate in research. These include constant fear of detection and deportation, concerns about data misuse, stress from precarious employment, unstable housing conditions, and experiences of discrimination. Many have limited time due to long working hours in exploitative conditions, and some may lack access to transportation, childcare, digital tools, or safe meeting spaces.

A central message in the guidelines is that meaningful PAR depends on **trust-building**, which requires long-term engagement, transparency, and relationships developed through community organisations or peer networks. Many undocumented migrants mistrust institutions, including universities. As a result, partnerships with grassroots organisations already trusted by the community—migrant-led, feminist, trade-union, or social-justice groups—are essential, together with the recognition of the time and effort it took for these groups to build this trust.

Peer research plays a key role: interviews and focus groups conducted by migrants themselves increase reliability of the data and deepen participation. Peer researchers understand cultural contexts, languages, and lived realities that outsiders may misinterpret or overlook. They also help create safe environments in which participants can speak freely.

The guidelines outline major subjective and material barriers to participation:

- **Fear** – of authorities, exposure, retaliation, or loss of livelihood.
 - Need for privacy and anonymity, ethical codes and safeguarding.
- **Time scarcity** – due to long or unpredictable work schedules.
 - Adapt to their schedules, constant flexibility, make sure it is useful for them to invest their time on the PAR, for instance linking it to capacity building

- **Stigma** — linked to being labelled “undocumented,” “vulnerable,” or “needy.” Also places associated with welfare services or institutions may deter attendance.
 - Make sure locations have no associated perceptions
 - Ensure that they are invited for their capacity for response, resist and organise, not as victims
- **Inaccessible language** — technical or academic terminology may alienate participants.
 - Use common easy language, clarify concepts and look for normal synonymous
- External proof-reading of people not involved in academia nor civil society
- **Material obstacles** — lack of devices, transport or other indirect expenses
 - Make sure every potential cost is funded, even minimal transportation
 - Offer food as part of the focus groups, provide child care if needed
 - Not assume everyone has devices and connection to Internet
 -
- **Compensation challenges** — financial payments may be restricted by law or create fears around personal data;
 - alternatives include vouchers, community funds, or indirect compensation.

(ii) Guidelines for consortium partners to follow

Implementation of PAR: Stages, Methods, and Practical Considerations

The guidelines outline 7 different stages that can often be included in a PAR project. However, keep in mind that the research design is adapted contextually and not each phase may be needed in all cases.

1. **Consultation and First Approach** — Building trust, explaining objectives, listening to community concerns, and understanding initial expectations. Informal conversations, preliminary group meetings, and personal networks play an important role.
2. **Formation of the Research Group** — Ensuring diverse representation, voluntary participation, clarity about roles, and multiple levels of commitment so participants can engage without overburdening themselves.
3. **Definition of the Problem and Research Question** — Identifying priority issues through collective reflection, root-cause analysis, mapping community assets, and validating problems with the wider community. Intersectional and contextual complexity should be acknowledged.

4. **Study Design** — Planning objectives, timelines, responsibilities, translation and transcription needs, ethical safeguards, training, and realistic resource allocation. The guidelines stress that translation is often underestimated in cost and time.
5. **Fieldwork** — Frequently involves peer-led interviews, focus groups, or collective reflection sessions. Pilot interviews help test sensitivity and functionality of questions. Emotional support, flexibility, and trauma-aware facilitation are essential.
6. **Action and Dissemination** — PAR must lead to action: advocacy, policy proposals, rights awareness, collective organisation, union training, communication capacity, and other practical initiatives. Actions must be realistic, contextualised, and co-created.
7. **Evaluation** — Participatory evaluation assesses both process and impact, identifying reasons for participation or withdrawal, monitoring outcomes, and ensuring learning feeds back into practice. Evaluations can be practical (decision-making focused) or transformative (empowerment-focused).

Conclusions: Potentials, Responsibilities, and Conditions for Success

The guidelines conclude that PAR is an effective methodology for studying and improving the conditions of undocumented migrants, particularly when it incorporates peer research and genuinely acknowledges migrants' lived expertise. Through collaborative knowledge production and action, PAR strengthens self-representation, builds collective power, and increases the likelihood that research leads to tangible improvements in working conditions, legal awareness, or access to support. However, PAR is complex and not always feasible. It requires:

- considerable time and financial resources,
- careful attention to ethics and power dynamics,
- flexibility incompatible with some academic structures,
- and strong, trusted relationships that cannot be rushed.

Without these conditions, participatory projects risk slipping into extractivism, tokenism, or unrealistic expectations. When implemented thoughtfully, with an intersectional lens and respect for the realities of undocumented life, PAR can facilitate genuine social transformation and empower people who are often excluded from public debate.

The guidelines ultimately stress that PAR is more than a method—it is a commitment to working *with* undocumented migrants rather than *on* them, and to creating research processes that recognise, strengthen, and support their agency.

(iii) Evaluation of how the guidelines helped streamline the DignityFIRM project

In keeping with the PAR approach, an evaluation to assess effectiveness or impact should also be participatory, as such, participatory evaluation can be conducted either during or after implementation, but it is desirable to have **periodic ongoing check-ins** that allow redirection measures to be taken. Considering the ongoing flexibility required by the PAR-approach, **impact indicators** need to be set in the initial planning, in high detail, for the evaluation to be effective.

The evaluation can be led either internally or by external professional evaluations using participatory methods. Depending on its aims, there are two main frames to classify the participatory evaluation:

- **Practical participatory evaluation** seeks to promote the use of evaluation for decision making
- **Transformative participatory evaluation** seeks to empower practice partners and mobilize social change.

Transformative participatory evaluation was chosen for the DignityFIRM project. Based on this evaluation below it is outlined how the guidelines helped streamline the DignityFIRM project, based on the experience of PAR during the project.

First of all, the guidelines helped to maintain a balance between guidance and autonomy with the PAR approach. In projects with complex coordination structures like Horizon Europe projects, it was necessary to strike a constant balance between providing methodological guidance and respecting the decision-making capacity of the organisations involved. This involves fostering monitoring and self-evaluation processes, whilst not shying away from providing clear instructions and methodological support where necessary by using the guidelines.

Using guided forms to structure proposals was helpful when issuing a call for organisations to help implement PAR. Asking detailed questions helps clarify what information is required and reduces ambiguity compared to general instructions. Ways can be found to include guiding questions whilst allowing for flexibility and autonomy in the proposals.

The clear written guidance of the guidelines on key issues such as data management, ethical considerations, reporting, the logical framework used in the design of actions, the formulation of public policy recommendations, and evaluation methods was instrumental in the success of the training of the PAR peer researchers.

Conclusion: Evaluation of the DignityFIRM guidelines shaped during the DignityLABS

To conclude this research handbook, we briefly reflect on how the guidelines have served the overall project implementation. We hope that this reflection may be valuable for fellow scholars engaging in similar large-scale, interdisciplinary research initiatives. In doing so, we revisit the two evaluations of the DignityLABS that were held half-way and towards the end of the project, as these DignityLABS have been the chosen format throughout the project to collectively shape and sharpen the guidelines as a whole of consortium effort. Given the centrality of the DignityLABS in the project, we view these DignityLAB evaluations as essential markers indicating how the project research design has performed in achieving the overall project objectives.

The guidelines were also helpful tools to bring expertise from one discipline (e.g. EU law) to another (e.g. Public Health). The disciplines intersect at different institutional levels. In this example the European Agency for Safety and Health at Work (EU-OSHA) sits at the intersection of these disciplines. Thus, this was an organisation we interacted with to discuss and disseminate our research findings. The guidelines thus facilitated the research and were helpful in identifying the institutional setting where best to share our research findings.

The coordinators were praised by the consortium members for using DignityLABS and the guidelines to encourage comparative research designs. However, they were also commended for remaining open to alternative methods based on the national context or specifics of a case study, as well as alternative data collection opportunities that emerged in the field. The guidelines were therefore used to provide guidance, rather than rigid prescriptions. The coordinators were keen to respect the professional quality and ethics of the researchers in the consortium.

Guiding innovative research design

As indicated by the respondents of the survey (filled in by consortium members), the DignityLABS were judged as a place where consortium members could raise practical & theoretical issues, an exchange for findings and field experiences. Similarly, respondents indicated that exchanging ideas and the streamlining of the project implementation was found.

Asking concretely how the DignityLABS fostered innovation in respondents' research, respondents largely focussed on the exchange of ideas as central. They could learn from new perspectives from different disciplines, backgrounds, and existing knowledge. As respondents indicate, during the DignityLABS there was space for discussion and reflection on such things as methodological issues, fieldwork experiences and research outcomes. The DignityFIRM

guidelines and instructions in methodological material were also appreciated. The exchange, sharing and discussing items of the guidelines in an interdisciplinary setting, fostered innovation in the DignityFIRM project.

Integrating the work of a large multidisciplinary consortium in a research design to support the DignityFIRM project activities is no easy task. The DignityLABS were the setting where all the different consortium members could align and exchange ideas. Based on the survey we conclude that the DignityLAB set-up was effective in fostering innovation thanks to its interdisciplinary setting where people from varying backgrounds (professional or otherwise) could exchange & reflect on ideas, findings, field experiences and reflect on & discuss practical & theoretic issues.

ANNEX

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