Communicating Effectively:
A guide to disseminating knowledge from the European Platform tackling undeclared work
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Step One: Sharing Platform results

1. Introduction

What does the European Platform tackling undeclared work seek to achieve?

Undeclared work involves any paid activities that are lawful in nature but not declared to public authorities, taking into account the differences in EU Member States’ regulatory systems.

Created in 2016, the European Platform tackling undeclared work (forthwith the Platform) aims to:

▶ enhance knowledge sharing and cooperation among national authorities and others involved in tackling undeclared work;
▶ help Member States to deal better with undeclared work;
▶ increase public awareness of undeclared work.

Why is it important to tackle undeclared work and how should it be approached?

Tackling the complex problem of undeclared work requires a holistic approach, with national governments joining up the policy areas of labour, tax and social security law at both strategic and operational levels. This approach also requires cooperation with social partners and other key stakeholders, such as local authorities, courts, border authorities, police, etc.

It is essential that key learnings shared with and developed by the Platform are disseminated to the appropriate national authorities and social partners. This allows for the development and implementation of effective national strategies and approaches to tackling undeclared work.

The role of Platform members and observers

As a Platform member or observer, you are considered an ambassador of the Platform. The Platform provides a space and opportunity for you to enhance the impact of the work you do at national level by:

▶ sharing information and expertise with your EU counterparts;
▶ identifying good practice (what works well in one country that could be adapted/applied to another);
▶ increasing your knowledge and evidence base of what works;
▶ engaging in closer cross-border cooperation and joint activities.

One of your roles is to help disseminate the Platform’s work and results (e.g. learning papers and good practices) among your colleagues, social partners and a wider audience at national level. Figure 1 illustrates your role as an ambassador of the Platform’s work.

Figure 1: Disseminating to stakeholders: your role between the Platform and stakeholders

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1 A glossary of key terms is available at [http://ec.europa.eu/social/main.jsp?catId=1323&langId=en](http://ec.europa.eu/social/main.jsp?catId=1323&langId=en)

2 Many thanks to Pål Lund, Norwegian Labour Inspection Authority for allowing us to adapt his model.
Who are the key stakeholders involved in tackling undeclared work?

Besides labour inspectorates and tax authorities, other stakeholders include:

- Ministries responsible for:
  * social affairs
  * finance/business/growth/economy
  * specific sectors (e.g. transport, construction, agriculture, tourism)
  * justice, security and immigration
- Social security departments/offices
- Social partners
- Health and safety authorities
- Sectoral workers associations
- Non-profit/non-governmental organisations
- Local/regional authorities
- Financial police
- Lawmakers/courts
- Embassies and authorities in other Member States
- Whistleblowers

Experience from the Swedish Work Environment Authority

As tackling undeclared work is high up on Sweden’s national political agenda, there is close collaboration between all national authorities and social partners, in addition to wider collaboration with other Nordic countries.

The sharing of information is made possible through a steering group and proactive programme office. Their dissemination activities include:

- sharing information about the work of the Platform at regular meetings (external and internal);
- national stakeholder meetings four times a year;
- regular newsletters to social partners and authority/ministry partners;
- sharing other relevant materials from working groups by email;
- other activities, such as organising presentations and events, and encouraging different authorities to attend and act as ambassadors for the Platform.

In 2017, Swedish Platform members organised a series of five national seminars, inviting national institutions to discuss how to boost the fight against undeclared work and how the resources created by the Platform could help. Each seminar focused on a specific issue, and these events helped to define a common language and understanding of key concepts and roles. See Annex 1 for an example national seminar agenda.

Experience from the Central Customs Authority, Germany

Recognising that combating undeclared work is not only a task carried out by public authorities, the Federal Ministry of Finance set up a nationwide Action Alliances with employers’ associations and trade unions in nine sectors. The representatives of the Federal Ministry of Finance, the Central Customs Authority, social partners and other organisations exchange information at annual working group meetings. There are also regional Action Alliances through which important regional aspects of national issues are discussed. The social partners in the alliances receive sector-based data and provide information about possible cases of undeclared work, leading to better inspection outcomes. The Alliances have also undertaken joint actions such as publishing leaflets and raising awareness. In order to be effective, the information given by social partners needs to be precise, so an online form was developed to facilitate information sharing. The public act of signing up to an Action Alliance has also been a success factor, as it gives employers’ associations and trade unions the chance to raise their public profile and engage in dialogue about developments in the relevant industries.
2. Q&A: Answering questions on the tip of your tongue

Who is the toolkit for and why do we need it?

This toolkit has been developed to support Platform members and observers to communicate with their national stakeholders, to disseminate the Platform’s results and outputs, and raise awareness of its work.

The toolkit will help you to:

1. Share knowledge: disseminating the Platform’s outputs will help spread messages, knowledge, lessons learned and so much more. Sharing information across agencies will strengthen the impact of learnings developed by the Platform. In addition, the valuable feedback you get from colleagues and stakeholders can be channelled back into the Platform.

2. Build credibility as an expert: disseminating information from the Platform will make our joint efforts more visible and build your authority as an expert in fighting undeclared work. Your colleagues and external partners will appreciate it if you share the Platform’s results in an easy, accessible way. Depending on the circumstances, sharing information could also lead you to expand your network and make new connections.

3. Increase awareness of the Platform: Another benefit of disseminating Platform outputs is to increase general awareness of the Platform, and to promote the credibility and reach of our combined efforts. In turn, we hope to build a strong network that will support our overall effort to tackle undeclared work across the EU.

Do you need to be a communications expert?

No.

We are aware that most Platform members are not trained communications experts. For this reason, we have produced a whole spectrum of dissemination activities and tools (see Figure 4) that you can use to share the Platform’s results. It identifies several ways to help you share key messages and outcomes, no matter how much or how little time you have. Where possible, we suggest that you also collaborate closely with your internal and external communications colleagues for expert advice in developing and implementing activities.

What is in this toolkit?

This toolkit is packed full of guidance and resources that are designed to help you communicate the Platform’s work and results, engage with stakeholders and spread your collective success.

It is a handy and easy-to-use guide on communication and dissemination. In it, you’ll find a range of methodologies, tips, and sample support materials to improve dissemination of the Platform’s results at national level, and to monitor the impact and effectiveness of those activities. These approaches have been discussed with Platform members and reflect feedback received at the Communicating Effectively dissemination seminar in September 2018 (Brussels).

You might also like to read a further toolkit called Information tools and approaches to reach out to workers and companies in the fight against undeclared work.3 This guide for practitioners showcases examples of how Platform members use information tools to tackle undeclared work effectively.

3. The dissemination spectrum: reaching audiences through the right activities and tools

Sharing Platform results with your colleagues and other relevant partners is likely to be in addition to your normal job. So based on Platform members’ feedback we propose a spectrum of dissemination activities and tools (see Figure 4) to help you weigh up and carry out the activities that best suit your circumstances.

Your level of involvement can vary from sharing existing content to organising information or training sessions for certain work groups, and anything in between. For example, it could be going for a coffee with a colleague to discuss the workshop you attended, or tailoring some Platform outputs to your local context.

It is important to choose dissemination channels that will work well for the target audience, and for the type and complexity of message to be communicated. Each Platform member can choose the approach that best fits their own audience, environment and resources at a particular time and, ultimately, the style that they feel most comfortable with.

3 See: http://ec.europa.eu/social/udw
This could include, for example, posting Platform materials on your website as the European Builders Confederation has done.

*Figure 2: Including Platform outputs on your website*

Or, for inspiration on using Twitter to help with dissemination, check out [@bart_stalpaert](https://twitter.com/bart_stalpaert) and #undeclaredwork.

*Figure 3: Using social media to share Platform outputs*
Moreover, the communication tools and activities complement each other and can function together at different moments. For example, your target audience can be exposed to several different tools at different stages of your activity timeline, such as:

1. Receiving a newsletter from the Platform;
2. Receiving an executive summary covering the key points discussed at a seminar, or a short article about a new report that has recently been published;
3. Discussing key points during an informal 1-to-1 meeting or as part of a bigger event.

Experience from the Labour Inspectorate, Ministry of Social Affairs and Employment, the Netherlands

To emphasise the importance of tackling undeclared work and create a common approach within the Netherlands, the Platform representative mapped out and prioritised the relevant stakeholders. Certain target groups and offices were encouraged to send representatives to Platform events and national seminars. Event participants later shared the learning with their own stakeholders (multiplier effect), which resulted in increased understanding and interest in the Platform’s work.

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4 See the Annexes for samples. For real examples from Platform members, see also the Toolkit on information tools and approaches to reach out to workers and companies in the fight against undeclared work.
**Activity Levels**

**Share existing materials**

The Platform’s newsletter and any other materials (videos, infographics, executive summaries, short articles, etc.), once uploaded to the Platform website or collaborative space, or provided by other Member States, can easily be shared with certain target groups by email or through blogs, the intranet or social media channels. Several Platform Members share Platform materials with their colleagues by email or other internal communication tools. For instance, Belgium, Ireland, Greece and Lithuania upload relevant materials to their intranet sites. Twitter is also used by several Platform members to share information with their networks.

**Adapt, create or translate**

Some existing materials need to be adapted or translated in order to be more relevant for certain target groups or communication channels. See section 7 on tailoring the Platform’s messages to your audience. Other tools will need to be created from scratch, including:
- a short article or elevator pitch to summarise a lengthy report;
- an infographic or chart to make the information more visual.

**1-to-1 meetings**

Short 1-to-1 discussions can be a very efficient way to keep key colleagues or stakeholders up-to-date with news from the Platform or best practices from other countries, or simply to persuade them to get involved in certain actions. An elevator pitch and one-slide summaries are always handy tools for this kind of approach to get the conversation going.

**Events and existing workshops**

Regular meetings or existing workshops can be used to bring certain news or aspects of undeclared work to the attention of different stakeholders or policymakers. For example in Latvia there are quarterly meetings of heads of divisions and regional inspectorates as well as special working group meetings of coordinators of undeclared work inspections.

Dedicated workshops can be organised for colleagues over lunch or breakfast (with food provided) to give Platform updates, as well as plan and discuss future activities.

Webinars should be considered when physical events or meetings are more difficult to organise.

**Consider partnerships**

Some countries may have similar issues or solutions and could therefore use similar dissemination tactics. A simple assessment can help identify potential partners at national and EU level to generate managerial and operational support. Once partnerships are in place, more impactful tools (whether creative videos or engaging infographics) can be developed, as more financial and knowledge resources are available. Some Platform members have already set up working groups to coordinate dissemination activities (e.g. the Nordic group).
Experience from the Labour Inspection Authority, Norway

In Norway, learning from the Platform is cascaded down to national and regional stakeholders through a sequence of actions. After attending a Platform event, the delegate from Norway uses an internal communication guide to help with dissemination. This involves preparing a report that highlights the most relevant findings to colleagues within the Labour Inspection Authority. The key messages are shared within the team, in 1-to-1 meetings with the head of the unit, and with other relevant staff members. The head of unit shares the Platform knowledge with regional managers through informal exchanges, and specialised training and seminars are arranged for inspectors.

Platform learning is also shared with external stakeholders, firstly through the authority group, and secondly through a social partner group. The authority group is composed of senior representatives from the tax, revenue, police and social welfare services, and meets with the Platform representative every three months. The group also has access to the Platform’s collaborative workspace. Each group member shares the learning from the Platform within their respective institutions, tailoring the information to their interests.

The social partners group brings together eight social partners, and was specifically created as a forum to discuss the messages from the Platform and their relevance to Norway. This approach has helped to generate interest in the topic and political support for tackling undeclared work.

Effort investment vs. impact

Feedback from Platform members indicates that building and maintaining with both national and cross border stakeholders is critical. Increasingly, Platform members have formal structures at national level to bring together the diverse organisations needed to tackle the complex issue of undeclared work. The following examples show how Finland, France and Belgium have set up formal structures with key partners.

Share materials

Written communications such as reports, newsletters, manuals, notices and announcements are an ideal trigger for electronic or face-to-face interaction because recipients can follow up if questions arise.

Electronic communication channels include email, Internet, Intranet and social media platforms such as Facebook, LinkedIn, Twitter and YouTube. These channels should not be considered as mass communication methods; they enable personalisation and tailoring, and are better perceived when they are crafted in a ‘1-to-1’ (sender-to-recipient) style. Newsletters (Annex 2) and Fiches (Annex 3) are two examples of these methods.

1-to-1 meetings, events and workshops

Face-to-face or personal communication is one of the richest types of interaction. Physical presence, tone of voice and body language help audiences to interpret the message as intended by the speaker. Audiences will only retain 20% of the content they are exposed to, so your messages need to be short and repeated often. Face-to-face communication is best used for complex or emotionally charged messages. Dissemination tools that are especially useful for face-to-face communication are elevator pitches5 (Annex 4) and PowerPoints (Annex 5).

Partnerships

In your work and participation in the Platform, you may benefit from creating partnerships with other countries and Platform members. A group of neighbouring countries could join together to identify a common target audience and share dissemination tools such as videos (e.g. the Nordic group). Likewise when a country authority is notified of nationals participating in undeclared work practices in another country, the two countries could consider a partnership to tackle common challenges with policy and communication actions.
Experience from the Ministry of Economic Affairs and Employment, Finland

Finland has a comprehensive legislative framework and high-level political commitment to tackling undeclared work. As a result, the Platform member is proactive in promoting measures to tackle undeclared work and sharing successful approaches that have been tried and tested in other Member States. Finland has created a ‘mini Platform’ at national level, with a steering group that leads dissemination activities such as organising events and meetings, providing website content on the most relevant policy topics. Each member of the national Platform is responsible for sharing the information with their respective institutions. Rather than being a ‘signposting service’ for the members, the mini-Platform tailors key lessons to national needs and priorities. This approach has helped to ensure commitment from different stakeholders, and improved knowledge and expertise on undeclared work.

Actions that require more effort, such as tailored/large/organised workshops, will create greater impact and generate wider discussion around selected topics. Actions which require less effort, such as disseminating existing material, may be overlooked and have less visibility. While we recommend that Platform members invest as much effort as possible, even low effort actions should create some impact and inspire further reflection.

Experience from the Labour Inspectorate, France

The French administration has strengthened cooperation between the different authorities in charge of fighting fraud by creating operational departmental committees against fraud (CODAFs). CODAFs bring together services which include the tax, customs, labour and social security authorities to share data, experiences and training. This allows cross-authority collaboration to identify complex and large-scale types of fraud.

Experience from the Labour Inspectorate, Belgium

The Belgian Labour Inspectorate has increased its cooperation with various national institutions, including the tax department, police and prosecution office, in order to help tackle the issue of letterbox companies. This national level cooperation is considered to be successful in deterring the establishment of letterbox companies, identifying those that already exist and bringing about criminal proceedings.

4. Materials and tools to disseminate

The Platform produces different types of materials, from brief executive summary reports to detailed step-by-step toolkits. These different types of outputs can be used to communicate the Platform’s messages and results directly. A key message from the dissemination seminar (Brussels, September 2018) is to tailor these resources in line with the national context as this can create more impact. Examples are provided throughout this toolkit and in the Annexes. In addition to the collaborative space, which is an internal communication tool enabling the Platform to share materials, there are a number of publicly available resources that can be accessed through the Platform’s website.⁵

- **The Platform’s newsletter**: this is sent out twice a year and is available on the Platform’s website. It features news about the latest and upcoming Platform activities, and could also include stories from Platform members and observers about relevant national developments. Platform members can invite relevant national stakeholders to subscribe to the newsletter.⁶
- **Videos**: these raise awareness of the Platform and the importance of tackling undeclared work. The video presenters are Platform members, observers and key figures in the effort to tackle undeclared work in their country or in Europe, and the short clips can be promoted on social media.
- **Learning resource papers**: these reports on the key discussions and findings at Platform events, supplemented by additional research and analysis, are publicly available.
- **Toolkits**: these are developed alongside some of the Platform’s mutual learning events.
- **Practice fiches**: transferable examples and approaches are documented in practice fiches that are available in the virtual library on the Platform’s website.
- **Study reports**: studies and surveys looking at specific topics help Platform members and observers to increase their knowledge and understanding of key issues around undeclared work.

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⁵ [http://ec.europa.eu/social/udw](http://ec.europa.eu/social/udw)
Disseminating Platform outputs requires good communication so that people can access and act on the information provided. This section of the toolkit gives you tips on planning for success, getting started, sustaining interest and spreading your message. You can work through the different sections or dip into particular parts of it that you are most interested in. Engaging with different target audiences is not always easy. We have discussed the issue with some Platform members in order to better understand the main communication challenges they face when it comes to dissemination. While the learnings are not exhaustive, some of the common challenges are summarised below. Solutions on how to handle these challenges with the help of the Platform and this toolkit are listed alongside them.

### Figure 6: Dissemination challenges and solutions

<table>
<thead>
<tr>
<th>Dissemination challenge</th>
<th>Solution</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Interest in a complex topic</strong></td>
<td>Tailor your messages to the audience you are addressing. While some general subjects can be relevant for everyone; colleagues, stakeholders and policymakers deal with different aspects of undeclared work and therefore have different communication needs and expectations. Learn more in section 7 on tailoring the Platform’s messages to your audience.</td>
</tr>
<tr>
<td><strong>Lack of time or communications knowledge</strong></td>
<td>Use the methodology and tips provided in this toolkit and examples from other countries as inspiration. Aim to integrate communication activities into your weekly routine. Also try to involve communications experts within your organisation (if available) as often and early in the process as possible.</td>
</tr>
<tr>
<td><strong>Lack of resources</strong></td>
<td>Use the resources at your disposal by requesting tools developed by other countries and tailoring to your needs. This encourages cross-border collaboration and partnership.</td>
</tr>
</tbody>
</table>
Language

The Platform’s materials are in English and this can be an obstacle in some countries or for certain working groups. Furthermore, practice examples from other countries can sometimes be difficult to follow as they are available only in the local language.

While some materials can be disseminated in English, we recommend translating the more complex ones before sharing them. There are free translation tools which cut down the work and cost involved but they always need careful quality checks. If you are interested in an information tool from another country, reach out to the country representative for a brief description in English and get more insights into how you could use it in your work.

Inaccessible format

Some materials can be difficult to follow, especially those produced by people who are not experts in the topic. Although extensive reports and detailed studies are very informative, they can take too long for people to read.

Focus on the executive summaries and report conclusions. Simplify the content, keep it short and make it as visual as possible with the help of the samples provided in the Annexes to this toolkit. Include key points and links to further information. In meetings or events which require face-to-face conversations, provide an overview which covers the main ideas.

Lack of knowledge about what works best

When planning a communication activity, it can sometimes be difficult to understand which approach is effective when sharing learning practices with national stakeholders.

Use the information in this toolkit for advice on different approaches. To evaluate the effectiveness of the selected dissemination activity, try to implement monitoring mechanisms that are proportionate.

Source: Authors, based on feedback received from participants in the dissemination seminar (Brussels, September 2018)

No matter what challenges you face, or the types of activities and tools you choose to use to disseminate Platform outputs, we present some common guidelines to follow in the next sections.
6. Developing clear goals and objectives

A key step in developing a dissemination activity is to take the time to agree what you want to achieve. A starting point is to identify the ‘problem’ and what perception, attitude or behaviour you want to generate in the target audience(s). Once you have established a policy-related goal, it is important to define it clearly and support this with ‘SMART’ (Specific, Measurable, Attainable, Relevant and Timely) objectives so that you can measure your progress.

Figure 7: Developing clear goals and objectives

Turn a policy goal...

Example: ‘Increase political commitment to promoting the transformation of undeclared work in the informal economy into declared work in the formal economy.’

into a communication objective...

Example: ‘Bring together all key partners to develop a national strategy to be implemented within X months.’

then, develop SMART objectives.

7. Identifying your target audience(s) and who to involve for help

Make sure you are talking to the right people – your key stakeholders – as they are vital to your success. It is also worth considering who else influences those people.

Platform members and observers need to ensure that the outputs and messages are shared with all relevant parties within their organisation and country (see Figure 1). It is important to identify who needs to receive what information and when (e.g. your colleagues, your manager, social partners, etc.).

There are multiple stakeholders that you may need to connect, engage and interact with given that undeclared work is a cross-cutting issue. These include:

- **Organisations**: labour inspectorates, tax authorities, social security authorities, social partners, police, customs, other relevant authorities (e.g. ministries of foreign affairs for bilateral agreements), authorities involved in procurement (e.g. construction), and small and large businesses;

- **Audiences**: policy level (e.g. ministers and policymakers); operational level (e.g. labour inspectors, employers and workers on-the-ground in large companies, and in small and medium sized enterprises); and broader audiences to raise awareness (e.g. media and general public, including young people at universities and schools).

Categorise your target audience in relation to your objectives. This will allow you to determine the best approach in terms of messaging and outreach. For example, as suggested at the dissemination seminar (Brussels, September 2018), you could choose to disseminate to operational level staff who can test approaches and monitor progress, or you could choose to disseminate to senior management to support policy changes.
8. Tailoring the Platform's messages to your audience

Now think about the Platform's messages and results, and how they can be made relevant to your target audiences. What do you want your audiences to know, think and do with information from the Platform?

As identified in section 4, undeclared work is a complex topic with different aspects that are of interest to different targets. While some general subjects can be relevant for everyone, colleagues, stakeholders and policymakers deal with different aspects of undeclared work and therefore have different communication needs and expectations.

Before trying to communicate with the target groups, it is important to understand their starting point. What are the needs of your target groups? For example, the information your colleagues need may be different from what your manager needs. Why should they care about the information you are sharing, and how does it affect them? What obstacles do you expect?

Another way to think about it is: what do your audiences need to remember? The answer to this question might be different for different audiences.

Next, the best way to make sure people pay attention and use the information you are sharing is by tailoring your message to the audience you are addressing. This can mean adjusting content according to:

- **Tone**: for policymakers, communication needs to be policy-relevant, whereas for the general public, it needs to be straightforward and simple. Similarly, a different approach may be required for large companies than for small and medium-sized enterprises. While business communication is generally formal, your approach really depends on the situation. For example, if you are writing to an individual business person, chances are that they will prefer your writing to have a more direct, personalised and friendly tone. However, if writing to a group of senior managers, a certain level of professionalism combined with a conversational style is recommended.

- **Language**: Platform outputs are all produced in English. However, your colleagues or local partners may prefer to have a short summary of the material in your local language. This will make it easier for them to re-use.

- **Location**: did you know that Finnish media prefer to have facts and figures that compare regions within Finland, rather than comparing Finland to the EU average? Knowing the media landscape’s preferences in your local context can help make sure you give them the information they are most interested in. The same is true for your colleagues and social partners.

As circumstances change, you will need to update your messages accordingly, while all the time ensuring that new messages continue to reinforce your overarching key message. A useful formula to help you tailor messages (especially for elevator pitches) can be found in Annex 4.

**Tips for tailoring messages**

When tailoring or creating new messages, make sure they are clear, concise and consistent:

- **Clear**: relevant, and free of jargon and overly-technical language;

- **Concise**: no more than 2-3 key points that can be delivered or read in 7-8 seconds to ensure you have more control over the message;

- **Consistent**: messages must be repeated if they are to sink in, so your efforts need to keep reinforcing the same messages over and over again.

**Countering possible resistance**

It is also important to anticipate and handle potential resistance and/or apathy from your audience, particularly as this is one of the key challenges identified by Platform members in their outreach and communication efforts. For example, you could aim to change the belief that ‘the Platform is not relevant to me because I do not work on cross-border issues.’ Your communication about a specific learning resource therefore needs to show how the learning produced from that event is relevant to your colleagues or social partners in your country, to help them tackle various aspects of undeclared work more efficiently and effectively. Specific key messages could be identified, such as good practice examples from other Member States that are relevant to your country. This might include providing information on any evaluations carried out, and the impacts that this good practice has on tackling undeclared work, so as to stimulate interest in evaluating potential transferability. Participants at the dissemination seminar (Brussels, September 2018) emphasised the importance of providing facts and evidence in order to demonstrate that particular approaches to tackling undeclared work are successful, and then to quantify the potential return on investment. You could also consider sending a one-slide summary of the key points along with the longer report (see Annex 4).
9. Monitoring and measuring impact

Measuring impact during and after dissemination activities in order to determine how effective your activities have been is a final step to consider. Evaluation is key to understanding what works well and what to take into account for future planning, and it should be proportionate to the scale of the activity you are carrying out. Refer to Annex 7 for a simple template for monitoring dissemination activities.

Evaluation means going back to the start: use your goals and SMART objectives to set the parameters (refer to section 6 on developing clear goals and objectives). Monitoring and measurement should be carried out on a regular basis rather than waiting until the end. That way, you can adjust tactics if needed.

What do you measure?

- **Quantitative**: event attendance, newsletter downloads, website visitors, questions answered on social media, number of requests for cross-border inspections, number of practices and initiatives that are implemented, etc. These are all factors that can be counted and reported on.
- **Qualitative**: focus groups, feedback forms, interaction from followers, responses from colleagues, surveys, etc. These are factors that can offer subjective feedback, such as whether information was useful or too complex, or whether colleagues’ knowledge or mindsets have changed.
- **Internal review**: remember to consult with your project team on what went well or could improve.

10. Conclusion: Striking a balance – sharing knowledge and being a good communicator

Undeclared work is a complex topic with different aspects that are of interest to a wide range of stakeholders. The Platform researches and develops many tools and materials to help you share information about undeclared work. These resources are evidence-based and include a variety of national approaches to tackling undeclared work across the EU. Whilst they tend to be several pages long, not all of the information and examples will be relevant to your national stakeholders, depending on the priorities and situation within your country. That is why this toolkit promotes the adaptation and tailoring of content to different audiences.

This does not mean the longer reports should be ignored. Quite the contrary. Platform members are encouraged to ‘hook’ stakeholders with shorter, more visual content (when appropriate) in order to give them a snapshot of the vast knowledge the Platform has to offer. A short newsletter article or one-page infographic can lead the viewer’s attention to a longer study report if they are interested in more detailed information. That way, people are first made aware that the information exists and can then access it in more depth if needed.

Using a ‘dissemination spectrum’ will help you to choose the dissemination channels that work well for your target audience, and the type and complexity of message to be communicated. Platform members and observers can use the guidance and examples presented in this toolkit to help share knowledge from the Platform on how best to tackle undeclared work, and develop their own (preventative) communication approaches.

Annex 1: National seminar event example
Annex 2: Newsletter sample and methodology
Annex 3: Fiche sample and methodology
Annex 4: Elevator pitch sample and methodology
Annex 5: PowerPoint sample and methodology
Annex 6: Leaflet sample and methodology
Annex 7: Dissemination monitoring activity sample
Annexes

Annex 1: National seminar example

National seminars

The aim of arranging national seminars within the framework of the Platform is to bring together the different national authorities and bodies involved in preventing and deterring undeclared work. Such events provide a good forum for discussing objectives and possible activities to fight undeclared work more effectively and efficiently. They also enable the sharing of new, useful knowledge and offer networking opportunities, as well as stimulating action and building long-lasting cooperation.

Finland, France, Romania, Sweden and the Netherlands all held national events in 2017. Common success factors included the following:

- A clear focus for the event. For example: the benefits of (and conditions needed for) more target-focused cooperation between national authorities tackling undeclared work (Sweden); social dumping (France); or labour-market fraud and bogus schemes (Netherlands);
- Time for sharing views. The structure was a mix of plenary presentations and small working group sessions. In the case of the Netherlands, there was a ‘discussion game’ based on a practical example;
- High-level political support. In the case of Sweden, the Secretary of State from the Ministry of Employment gave the opening address;
- Active involvement of social partners;
- Follow-up activities to ensure momentum for action.

Example agenda from Sweden

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.00 – 9.05</td>
<td>Welcome: Senior representative to the Platform</td>
</tr>
<tr>
<td>9.05 – 9.15</td>
<td>Opening address: Secretary of State, Ministry of Employment</td>
</tr>
<tr>
<td>9.15 – 9.30</td>
<td>European Platform tackling undeclared work: Representative from the European Commission</td>
</tr>
<tr>
<td>9.30 – 9.45</td>
<td><strong>Sweden:</strong> priorities and practical approaches to undeclared work and unhealthy competition</td>
</tr>
<tr>
<td>9.45 – 10.30</td>
<td>Coffee break</td>
</tr>
<tr>
<td>10.45 – 12.00</td>
<td>The concept of trust</td>
</tr>
<tr>
<td>12.00 – 13.00</td>
<td>Lunch</td>
</tr>
<tr>
<td>13.00 – 15.00</td>
<td>Small group workshop aimed at closer and better cooperation in fighting undeclared work in practice:</td>
</tr>
<tr>
<td></td>
<td>• The concept of trust – how can it contribute to reaching our joint goals?</td>
</tr>
<tr>
<td></td>
<td>• Looking into the risks of fraud – a case-study around the table.</td>
</tr>
<tr>
<td>15.00 – 15.20</td>
<td>Coffee break</td>
</tr>
<tr>
<td>15.20 – 16.00</td>
<td>Reporting back plenary and closing words</td>
</tr>
</tbody>
</table>
Annex 2: Newsletter sample and methodology

Newsletters

Use your organisation’s existing newsletter to share outputs from the Platform. There are two options:

1. Share materials from the Platform by drafting 2-3 sentences about the subject and hyperlinking to where they can be found on the public website.
2. Create your own article.

Steps to take:

3. Review the background materials for key points and learnings. Checking the table of contents for an overview and reviewing the introduction and conclusion are the basic starting points. If you have more time, read other sections.
4. Create a summary of the key messages and learnings: focus on what information is going to appeal to your audience most (e.g. new findings, figures, concrete examples, etc.).
5. Draft content.
   a. Keep it short and simple. We suggest 500-750 words for a lead article⁷.
   b. Reference the sources or other relevant hyperlinks directly in the text. You can also add a ‘Find out more’ section.
   c. Use a clear and catchy title and sub-headings to guide the reader.

Tips:

- Contextualise content as much as possible. If there are broader EU findings, analyse how the information about your country compares with others or an EU average. If there is a country example that you think could be replicated or adapted, specifically mention the connection to your national context.
- Use the ‘inverted pyramid’ structure. The most important and newsworthy information is presented first, followed by the details or an example. General background information is presented last.
- Readers like lists. When it makes sense to do so, organising information into lists is a great way to keep people reading.

Source materials:

Copies of the Platform’s newsletters can be found here

These different newsletter articles can be copied, tailored and used freely.

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⁷ This depends on the existing format and length of your newsletter.
Example newsletter content

Cooperation is ‘of the utmost importance’
in tackling undeclared work

In Belgium, the introduction of an advanced IT-based risk assessment system has enabled the inspection success rate to increase from 35% to 75-80% of all checks. How do these risk assessment tools, indicators and red flags work? How are outputs used in scheduling and implementing inspections? What lessons can be learned about the interoperability of information systems?

These were some of the questions that prompted the Hellenic Labour Inspectorate to take part in a staff learning visit, hosted by the Belgian National Office for Social Security.

The following learning outcomes were identified from the visit, among others.

1. The fight against cross-border fraud and undeclared work requires effective cooperation

Both inspectorates recognise that undeclared work and social fraud is a growing problem that does not respect national borders. Participants in the visit reached a bilateral agreement to optimise cooperation and share knowledge, information and best practices.

2. Interoperability of databases is needed to set up effective risk assessment systems

The Greek participants found the Belgian Crossroads Bank of Social Security to be an inspiring example of a structure that enables data to be exchanged swiftly, effectively and securely.

3. A risk analysis tool helps detect fraudulent situations and offers more effective controls in the field

Greek participants wanted to find ways to increase the use of risk assessments by inspectors in the field, and found the Belgian approach of using specialists to be a good potential solution. Belgian inspectors liked the Greek approach of using minimal investigations carried out by inspectors and focusing on data mining instead.

The staff visit took place in September 2018, as part of the activities of the European Platform tackling undeclared work. The Greek delegates gained valuable information about how the Belgian inspection authorities work, which will help them set up and evaluate their own risk assessment system. As well as reaching a common agreement to set up a legal framework between the two institutions, a follow-up meeting was also agreed to look at operational matters in more detail.

For more information, contact [email and telephone; website]
Annex 3: Fiche sample and methodology

Fiches:

How findings from the Platform can be adapted to a national context

Steps to take:

1. Review the background materials for key points and learnings. Checking the table of contents for an overview and reviewing the introduction and conclusion are the basic starting points. If you have more time, read other sections.

2. Create a summary of the key messages and learnings: focus on what information is going to appeal to your audience most (e.g. new findings, figures, concrete examples, etc.).

3. Organise the information by theme or in another simple structure, when possible.

4. Draft content.
   - Keep it short and simple.
   - Reference the sources or other relevant hyperlinks directly in the text. You can also add a ‘Find out more’ section.
   - Use a clear title and sub-headings, or questions to guide the reader.

5. Include images or icons that add extra interest.

6. Share the factsheets in person or digitally.

Tips:

- **Contextualise content** as much as possible. If there are broader EU findings, analyse how the information about your country compares with others or an EU average. If there is a country example that you think could be replicated or adapted, specifically mention the connection to your national context.

- **Consider translation**: it will make the materials more accessible to your national audience.

- **Format**: Depending on where and how it is distributed, the format can be a simple two-sided word document or more stylised (e.g. a bi- or tri-fold PDF leaflet).

Source materials for the example:

- Executive summary of the Platform seminar: Tools and approaches to tackle undeclared work in the road transport sector (2 pages)

- A learning resource from the road transport seminar of the European Platform Undeclared Work (17 pages)
Example fiche:

**Tackling undeclared work in the road transport industry:**

**Context**

<table>
<thead>
<tr>
<th>Why focus on undeclared work within the EU’s road transport sector?</th>
<th>Undeclared work in the road freight transport sector has gained attention across the EU because of systematic failures by companies to comply with general and sector-specific regulations. There are cases of tax and social security fraud, and underpayment of workers in international road haulage. The classic form of undeclared work (e.g. underreported working time, overtime or cash-in-hand work) is prevalent in 'last mile' road freight transport. This is the result of an increase in e-commerce and home delivery.</th>
</tr>
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<tbody>
<tr>
<td>Undeclared work takes many forms in this sector in the EU</td>
<td>It can have a cross-border and national dimension. In both, undeclared work can take the form of underreported work (working hours, driving and rest time) and the false registration of employees. This seems to happen more when contractors are involved in multi-level subcontracting. Such strategies exploit regulatory loopholes and wage differentials, and make it complicated to verify compliance.</td>
</tr>
<tr>
<td>What is bogus self-employment?</td>
<td>Bogus self-employment (also referred to as false self-employment) is a form of disguised employment. It refers to people who are registered as self-employed but whose conditions of employment are, in effect, equivalent to dependent employment. For example, drivers in disguised employment receive payments from a client (most often a transport company) through an intermediary. However, the relationship with the client is such that, were the drivers paid directly, they would be employees of the client. The clients and drivers are therefore disguising an employment relationship to save on national insurance and taxes. This is a key issue among heavy-goods vehicle drivers, particularly in the UK.</td>
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</table>

**How the UK is tackling bogus self-employment in the transport sector**

To prevent drivers from falsely registering and classifying themselves as self-employed, the Road Haulage Association (a UK employers’ association) launched a campaign for its members. It provides information leaflets, direct contact with members, advisory services and a self-employment test for drivers to check their employment status. The test includes questions that help drivers think about work situations and their relationship with clients.

**But the problem is not just in the UK**

In cross-border road haulage, undeclared work arises, for example, when drivers are not declared as posted workers or when they are falsely registered in one country while providing services abroad.

**What are key challenges that Platform members have identified?**

- Ineffective implementation of European regulations at national level;
- Insufficient number of inspectors;
- Complicated inter-institutional and cross-border cooperation of competent authorities;
- Lack of education and training within and between authorities;
- Inefficient use of digital control devices and data sharing in a sector with highly mobile and dispersed workers.

**How can changes be made?**

- More efficient use of digital control devices;
- Better data management with data sharing;
- Enforcing regulations by improving cooperation of authorities;
- Encouraging voluntary compliance by using awareness campaigns;
- Promoting cooperation between labour inspection bodies and social partners to improve prevention and influence policymakers.
**Examples from other EU Member States:**

**Training and joint inspections to improve inter-institutional cooperation and detection of infringements**

<table>
<thead>
<tr>
<th>Focus on Italy: Fostering cooperation between police and the labour inspectorate</th>
</tr>
</thead>
<tbody>
<tr>
<td>The national labour inspectorate authority (INL), cooperates with the police authority. Both authorities have different competences for controlling road transport, and the INL is responsible for inspecting employment, contracts, and driving and rest time at the company's premises. The police authority is in charge of monitoring driving and rest times, and reading tachograph data at road-side inspections.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Focus on France: Enhancing controls and sanctions against non-compliant operators of light-duty vehicles</th>
</tr>
</thead>
<tbody>
<tr>
<td>The French labour and transportation ministries work jointly to tackle undeclared work in road transport, notably that involving light-duty vehicles. The ministries undertake joint and coordinated inspection of French and foreign light-duty vehicles, in partnership with police and labour inspectorate agents at key crossing points. The joint inspection aims to provide workers with information about their rights (wages, working hours and rest periods); assess the scale of undeclared work; and notify the company and impose fines (where applicable) in cases of infringement. When violations recur, the authorities launch an in-depth investigation against the company.</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Moving forward...</th>
</tr>
</thead>
<tbody>
<tr>
<td>New digital tools and databases are improving the detection of infringements, although only specific authorities have access to the systems for data protection reasons. However, it is clear that when authorities share and compare data, and assess high-risk and/or suspicious companies, inspections become better coordinated and targeted.</td>
</tr>
</tbody>
</table>

So far, policy measures have largely focused on deterrence and detection approaches. To improve outcomes, the focus needs to be on prevention and incentive measures. Digital resources also need to be widely used, including digital tachographs and the European Register for Road Transport Undertaking. Such measures could lead to more effective and efficient controls.
Annex 4: Elevator pitch sample and methodology

Elevator pitches

Methodology: how to prepare a winning elevator pitch

An elevator pitch is a compelling description of the problem you are trying to solve and who you will solve it for. A key benefit that distinguishes it from other formats is that it is spoken out loud, to a person or group. It can follow this basic structure:

For (target user), who has (user need), (concept/tool/product [name]) is a (market category/idea) that (one key benefit). Unlike (competition),⁸ the product (unique differentiator).

Before drafting a pitch, you should answer the following questions:

▶ What (concept/tool/product) am I promoting?
▶ Who is it for?
▶ Why do they need it?
▶ What are the benefits?
▶ Who else offers a similar concept/tool/product?
▶ Is the concept/tool/product different?
▶ What is the key benefit/quality/factor that sets the concept/tool/product apart?
▶ What makes it unique?

With these questions answered, you will have all the elements you need to draft the pitch.

Examples: elevator pitches to promote the use of risk assessment

Please note that these pitches are examples derived from the Executive summary of the thematic review workshop: risk assessment for more efficient inspections. By following the formula presented above, the person making the pitch should be able to tailor the elevator pitch to each individual situation or topic. Keep in mind that pitches are supposed to be short and specific: the aim is to leave the person with a clear idea of what they want to learn more about (or buy, in a commercial context).

These sample elevator pitches would be pitched by the relevant representative who wants to get support for introducing and sustaining risk assessment. The first pitch (30-second pitch) targets labour inspector management, whereas the second one (60-second pitch) targets policymakers.

⁸ As Platform members may not want to 'name and shame' or appear to discriminate between national/regional practices, the phrasing of this sentence needs to be carefully considered.
Examples: Elevator pitches to promote the use of risk assessment

### 30-second pitch

For labour inspector managers who need to predict, detect and prevent undeclared work, using a risk assessment model is a helpful way to use staff resources efficiently by identifying employers and/or sectors that are at risk of infringements. Risk assessment helps authorities design and prioritise their strategy for tackling undeclared work or working on prevention activities.

### 60-second pitch (including a specific example in your pitch can make it stronger)

For national authorities that need to detect and prevent undeclared work, using a risk assessment model is a helpful way to use staff resources efficiently by identifying employers and/or sectors at risk of making infringements. Risk assessment can help authorities design and prioritise their strategy for tackling undeclared work or working on prevention activities.

Take Spain for example: it used a risk assessment approach to identify a key benchmark (such as most workers having part-time contracts) and sent letters to 14,000 companies about potential violations. In response to that simple letter, 15% of the companies contacted made changes to their employment practices in order to become compliant. To make sure risk assessments are effective, it is important to define the input and output benchmarks for key indicators of undeclared work.

### Example: 60-second pitch from the Swedish Work Environment Authority, Unfair competition in working life

Companies that deliberately violate the work environment regulations in order to gain a competitive advantage create unfair competition in working life. Such companies can be found in all industries. The Swedish Work Environment Authority works very actively against unfair competition in working life, both on its own initiative and on the request of the government. One of the authority’s strategic objectives is for fewer companies to deliberately violate its regulations in order to gain a competitive advantage. In order to achieve this objective, the authority adopted a 2015-2017 strategy on 11 June 2014 to combat unfair competition in working life, along with an accompanying action plan. An additional task from the government is to develop and implement information campaigns that are specifically targeted to sectors and companies in consultation with social partners.

**Tip:**
- Personalise the pitch and use ‘you’ where appropriate.
Annex 5: PowerPoint sample

Elements of a preventative approach towards undeclared work report: Ways to condense, simplify and illustrate information

FORMALISATION SUPPORT TO START-UPS

**Germany**
The start-up premium, Gründungszuschuss, (GZ), is available to recipients of unemployment benefits to start their own business. In addition to unemployment benefits, recipients get a monthly grant of EUR 500 for the first 6 months. If successful, an additional EUR 500 is received for another 9 months.

**Croatia**
The “Work cleanly – be employed” project revealed 99% of cleaning jobs are in the undeclared economy. This initiative for unemployed people enables them to start their own business by providing non-repayable support to start cleaning and maintaining activities.

**Other examples of initiatives** to smooth the transition to self-employment:
- **Austria**: the business start-up programme for the unemployed
- **Belgium**: jobrurvalf
- **Estonia**: business start-up grants
- **Finland**: comprehensive support for self-employment
DEMAND-SIDE INCENTIVES (PART 1)

Sweden

Since December 2008, citizens have been able to apply for a tax deduction amounting to 50% of the labour cost for the renovation, conversion and extension of homes, and for household services including cleaning, basic gardening, babysitting...

Denmark

From June 2011 to the end of 2013, it was possible for each member of a household over the age of 18 to deduct up to DKK 15,000 (EUR 2,000) from their taxes to cover the costs of employing tradespeople or domestic helpers, under a pilot scheme called the Home-Job Plan (Bolig-Jobplan).

Finland

Since 2001, there has been a demand-side incentive that uses direct tax incentives to bring household services in the undeclared economy into the declared economy.

DEMAND-SIDE INCENTIVES (PART 2)

Targeted indirect taxes

- In the 2017 Annual Platform Survey, 30% of Member States responding stated that they provide targeted indirect tax incentives (e.g., VAT reductions) to purchasers of declared goods and services to tackle undeclared work.

Incentivising electronic payment systems and deterring cash payments

- Make point-of-sale (POS) terminals available across all sectors, including bars and taxis.
- Full transition towards electronic payments.
- Provide incentives for using cards at the POS.

Incentives for customers to request receipts

- In the 2017 Annual Platform Survey, 26% of Member States responding have developed initiatives for customers to request receipts (e.g., a lottery for receipts) to tackle undeclared work.
Annex 6: Leaflet sample and methodology

Leaflet/handout on Platform outputs

Steps to take:

1. **Review the background materials** for key points and learnings. Checking the table of contents for an overview and reviewing the introduction and conclusion are the basic starting points. If you have more time, read other sections.

2. **Create a summary** of the key messages and learnings: focus on what information is going to appeal to your audience most (e.g. new findings, figures, concrete examples, etc.).

3. **Organise the information by theme** or in another simple structure, when possible (e.g. approaches and transferable tools).

4. **Draft content**.
   a. Keep it short and simple.
   b. Reference the sources or other relevant hyperlinks directly in the text. You can also add a ‘Find out more’ section.
   c. Use a clear title and sub-headings to guide the reader.

Tips:

- **Contextualise content** as much as possible. If there are broader EU findings, analyse how the information about your country fits with others or an EU average. If there is a country example that you think could be replicated or adapted, specifically mention the connection to your national context.

- **Consider translation**. It will make the materials more accessible to your national audience.

Source materials for the example:

- Executive summary of the Thematic Review Workshop: Information tools and approaches to reach out to workers and companies (2 pages)

- A Learning resource from the Thematic Review Workshop: Information tools and approaches to reach out to workers and companies (26 pages)

- Summary report on the follow-up visit on information tools and approaches to reach out to workers and companies in the fight against undeclared work (7 pages)
APPROACHES

1. Introduce a preventative approach: this is typically more cost-effective than deterrence measures. It could, for example, mean approaching young workers, employers and students at the start of their working or businesses life, in order to create a culture of complying with labour law, based on the benefits of declared work.

2. Identify and understand target groups: get to know their motivations, attitudes, influencers and information needs. Here, cooperation and data sharing arrangements between authorities and with social partners can help identify targets.

3. Agree messaging – deterrence and/or positive:
   a. While positive messaging can lead to wider societal acceptance of declaring work e.g. by emphasising the support provided by public authorities, you can ‘nudge’ identified risky employers by negative messaging (threatening enforcement) if they do not get in touch with the respective public authority.
   b. It’s important to make sure that messaging is backed up with evidence.
   c. Simple, plain messages, use of humour and ‘story-telling’ can be helpful to achieve behavioural change.

4. Work with partners: Testing tool(s), message and dissemination activities with input from focus groups and/or social partners can better highlight what works best for whom before beginning large-scale outreach. For example, face-to-face consultations are more appropriate for those with limited internet access. Certain tools may also work best for specific sectors. Social partners, trade/industry associations, local and national authorities can also help you promote and propagate your messages among targets.

5. Evaluate impact: while measuring impact is challenging, social media, simple surveys and web analysis are useful and inexpensive ways to gather feedback and measure the results of tools.

TOOLS FOR CONNECTING WITH WORKERS AND COMPANIES IN THE FIGHT AGAINST UNDECLARED WORK (UDW)

Creating awareness and ultimately changing the values, beliefs and norms towards UDW of workers and employers is at the heart of organised communications and outreach activity undertaken by UDW Platform members. This is a handy list of approaches and tools that you can use to help you get it right!
TRANSFERABLE TOOLS

Many of the tools used by Platform members can be adopted in other countries. Interested countries could, for example, translate the tools, methods and communication strategies into their national language, or use other countries’ experience for developing and upsaling their own practices. An exchange of experts could offer support in adapting tools.

The following are the most common tools used by UDW members. See the UDW Platform Learning Resource Paper on Information tools and Approaches for more information.

- **Videos/infographics**: visual ideas are very attractive for all countries and video messages can easily be shared between countries; they need to be mobile friendly and culturally relatable to appeal to young people.

- **Digital tools**: digital communication is relatively inexpensive and is good for target audiences who are active online and/or working in the ‘gig’ economy. Informational and educational materials can easily reach (young) people if presented through a digital tool such as a mobile phone app, game, online checklist, or TV and social media content, e.g. on Facebook, Twitter, etc.

- **Leaflets/brochures**: these need to be tailored to local contexts. Placing leaflets on public transportation and in other public places is recommended.

- **Websites**: easily transferrable and can provide useful information on legislation, procedures, country fiches, employee entitlements, etc.

- **Notifications**: sending notification letters to risk groups of people or firms can be easily replicated. This approach requires a good risk-assessment methodology and quality information/databases.

- **Checklists**: checklists for identification of self-employment status or for issues of compliance an inspector will check, etc. are easily transferrable. Checklists need to be agreed or jointly elaborated among multiple stakeholders such as government agencies, employer groups and unions.

- **Surveys**: highly transferrable, particularly with regard to attitude questions.

- **Calculators and apps**: used by workers and even employers to calculate wage/tax/incomes.

- **Awareness campaigns**: have the advantage of including a multitude of information tools and dissemination channels that can target various groups and sectors individually. They are typically well-planned, long-term initiatives. Their promotional elements attract social partners and other supporters, thus strengthening the networking effect. Awareness campaigns are the most recommended tool for educating about the costs of undeclared and/or benefits of declared work.
## Annex 7: Dissemination monitoring activity sample

<table>
<thead>
<tr>
<th>Activity number</th>
<th>Reporting period</th>
<th>Name of organisation</th>
<th>Platform output/source of information (name + link)</th>
<th>Type of activity (e.g. share, adapt, create, etc.)</th>
<th>Tools used (e.g. ppt, elevator pitch, leaflet, etc.)</th>
<th>Date of activity</th>
<th>Location of activity</th>
<th>Number of participants in the activity/Other quantitative measurement</th>
<th>Short description of activity (+ qualitative feedback)</th>
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Getting in touch with the EU

In person
All over the European Union there are hundreds of Europe Direct Information Centres. You can find the address of the centre nearest you at: http://europa.eu/contact

On the phone or by e-mail
Europe Direct is a service that answers your questions about the European Union. You can contact this service
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– at the following standard number: +32 22999696 or
– by electronic mail via: http://europa.eu/contact

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Open data from the EU
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