

LESSONS LEARNT

for single national websites
on the posting of workers.



ELA Working Group INFORMATION, April 2023

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Disclaimer:

This booklet is a practical document of the European Labour Authority (hereinafter ‘the Authority’) developed from the experiences and insights obtained in the framework of the provision of information assistance service to the Member States.

The views and content in this document are intended to serve solely as practical examples of possible future approaches for the development of national websites related to posting of workers, and they do not constitute any policy, position, decision, or endorsement nor any formal proposal by the Authority.



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Objectives of the booklet

In the context of the Working Group on Information (2021 and 2022), the European Labour Authority (ELA) facilitated four peer review rounds of single national websites on posting of workers. When it comes to the posting of workers, EU directives¹ specify obligations for the EU Member States to provide up-to-date and accurate sets of information on a single national website². As reiterated by the Directives, the transparency and the accessibility of information are fundamental components of legal certainty and law enforcement. In the course of the peer reviews, Member States can volunteer to have their single national website (regarding the posting of workers) reviewed by another Member State. The topics covered include: accessibility, user-friendliness, and the quality and completeness of the content related to remuneration and posting declarations. A User Journey was produced in order to represent the experience of the user navigating it. In essence, the peer reviews aimed at improving the availability and quality of national information regarding rights and obligations in the area of cross-border labour mobility.

With that objective in mind and thanks to the resulting collection of needs and challenges that appear to be recurrent in conceptualising the single national websites on labour mobility, the present booklet aims at:

- Building on the results of the conducted peer reviews by focusing on **good examples and lessons learnt**;
- Presenting an ‘optimal’ User Journey for a single national posting website from both the employer and employee perspectives;
- Offering **tips and tricks** to support the Member States in the further development and fine-tuning of their single national posting websites. These tips and tricks contain practical information, examples and quick-wins to improve the website.

¹ [Directive 2014/54/EU](#) (Article 6), [Directive 2018/957/EU](#) (recital 21 and Article 1).

² [Directive 2014/67/EU](#) (Article 5).

IMPORTANT!

This booklet intends to offer practical examples for the further development of the Member States' single national websites on the posting of workers.
It serves only as a suggestion to be voluntarily considered by Member States, and is in no way to be understood as an obligatory guide.

1.

Key insights stemming from the peer review sessions and tips and tricks for improving single national websites

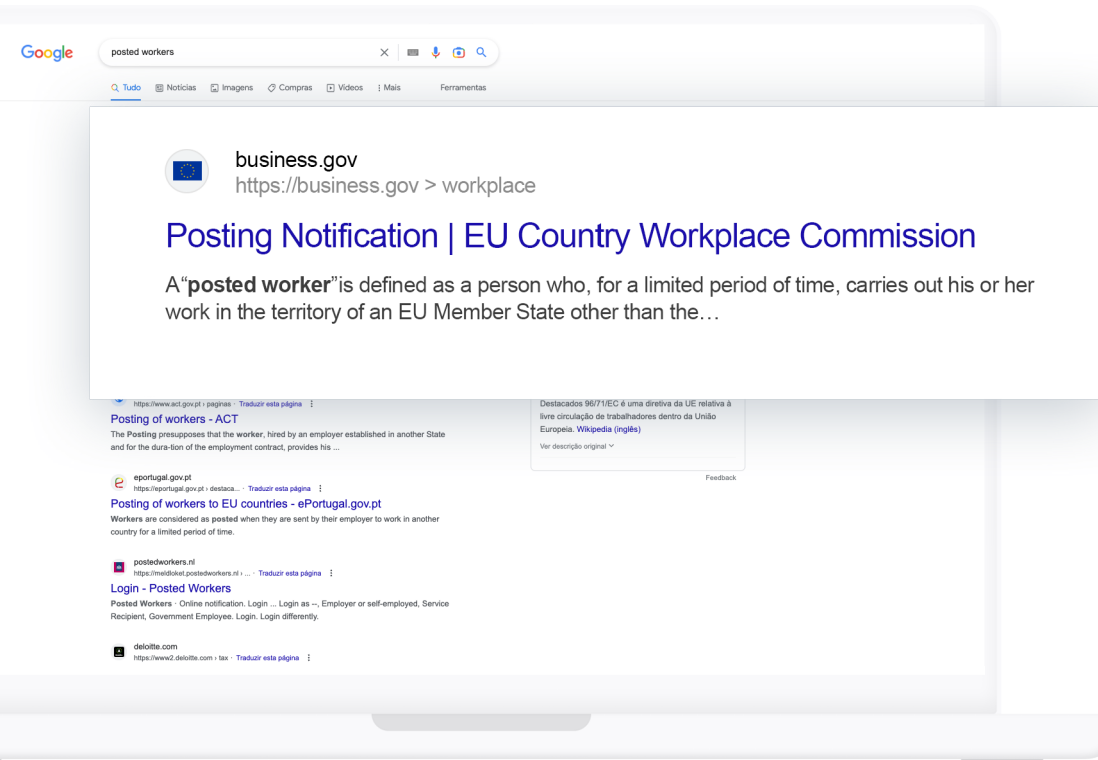
This section presents the results of the peer review sessions of 18 different national posting websites. It is structured like most of the peer reviews, with an initial focus laid upon findability and accessibility, followed by insights on user-friendliness, and finally observations on the content. As it draws from the reviewers' feedback during these sessions, this section presents observed points of attention and areas of improvement, as well as suggestions formulated to tackle the identified challenges and examples that were highlighted as useful. This section also presents a series of suggestions for Member States to further develop and fine-tune their posting websites. These suggestions are based on the peer review sessions and the optimal User Journey resulting from the observation sessions.

1.1 Findability and accessibility

1.1.1 Key insights on findability and accessibility

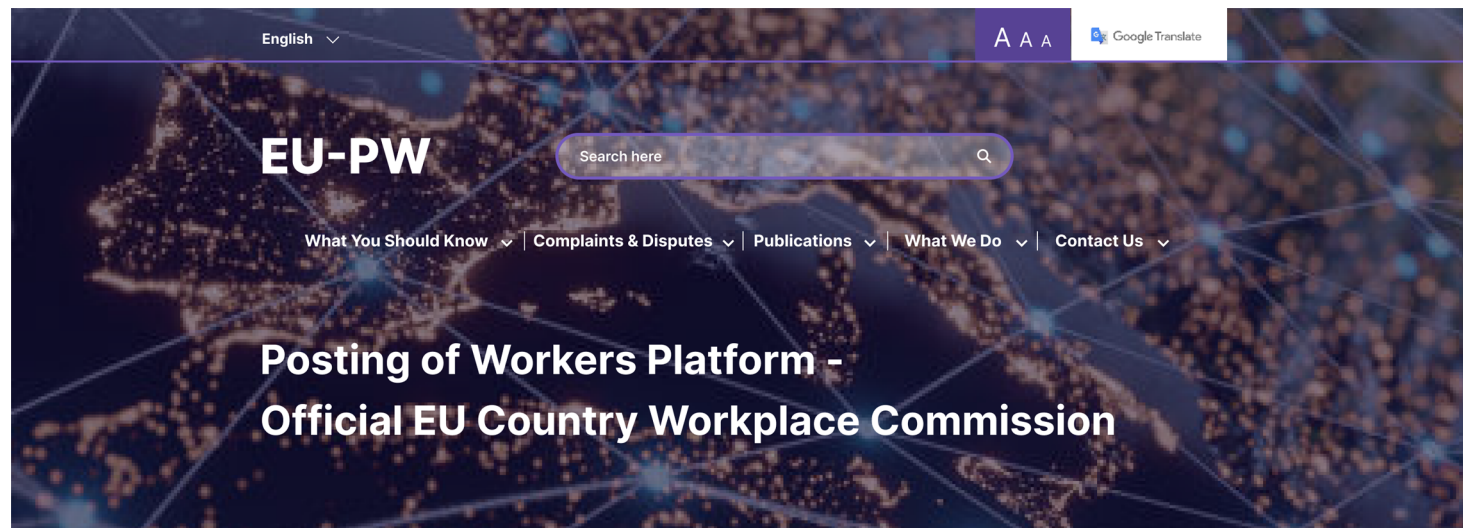
a. Search Engine Optimisation

The reviewers observed that the majority of the posting websites were easily findable using the most common search engines when using key words such as 'posting of workers' or 'posted workers' in combination with the name of the Member State. These websites should appear amongst the first results of the first page **of common search engines** such as Google, Bing and Duckduckgo. Amongst the good examples identified by the users, several posting websites scored especially high in terms of findability by appearing on the first results page even with more specific key words such as 'posting notification' or 'posting declaration' in combination with the name of the Member State.



It was also noted by the reviewers that the tags used to facilitate the referencing on search engines should not be limited to English or to the Member State's official language(s), but should also include other relevant languages. The reviewers also suggested to **include additional key search words and expand the range of these in the national language**. Amongst the words suggested to be translated and included are: 'working in', 'employer rights in', 'employee rights in', and 'working conditions in' combined with the name of the Member State. A more detailed list of meta-tag examples can be found in the tips and tricks for findability section of this document.

Since there are additional governmental websites with overlapping information, users could be confused regarding the information and the overlaps. To address this, the reviewers suggested to **include a statement on the landing page of the posting website which clarifies that the website at hand is the official national posting website of the Member State**.



b. Accessibility for people with disabilities

In regard to the accessibility of the website for people with disabilities, the following examples can improve the posting websites:

- enabling a **text-to-speech function**, which can also be included for all language versions the website offers;
- enabling the **change of font** to a more accessible format (e.g. sans serif fonts, dyslexia-friendly fonts, etc.);
- displaying options such as contrast and dark mode, to improve the accessibility of the text version of the website for **visually impaired users**;
- ensuring **compatibility with external browser plug-ins** to allow for customisation.

The reviewers also mentioned the alignment of the website to the **Web Content Accessibility Guidelines 2.0** (WCAG) of the World Wide Web Consortium (W3C) as a good example. It should be noted that several standards in terms of accessibility exist. Different examples in the likes of the WCAG can be easily found online and can serve as valuable information to foster accessibility. The European Union also took action to set standards in that regard, with examples such as [Directive 2016/2102/EU](#) on the accessibility of the websites and mobile applications of public sector bodies and [Directive 2019/882/EU](#) on the accessibility requirements for products and services both establishing minimum requirements in the matter. The landing page of the EC regarding [Web Accessibility](#) is a particularly useful tool to monitor the current requirements and solutions promoted at the EU level.

c. Linking to external websites

The reviewers mentioned the use of links as necessary to provide additional sources of information. The external websites to be linked include:

- the [Your Europe portal and EUR-Lex](#), for applicable European legislation
- official national websites on labour-related legislation and labour-related services;
- **organisations that provide support to workers and employers** such as social partners, labour inspectorate counselling and other national authorities, particularly in the context of the declaration obligation and social security matters;
- websites that provide information on self-employment;
- national liaison offices (NLO) for posting of workers, including the **details of the contact person** at the NLO, name of the institutions, languages spoken by the contact person, and the country code of the Member State with the telephone number;
- websites of other important national assistance providers relevant for the field of labour and economy.

Reviewers suggested to **embed the posting website within the ecosystem** of other relevant national (governmental) websites. The aim is to ensure linked websites also link back to the official posting website.

Reviewers also provided several attention points to improve the user experience and accessibility of these links:

- **ensure that all links are functional** and that the language versions of those external websites correspond to both the link and to the original website’s language (i.e. if a website is in a specific language, the link provided should correspond to the same language, if available);
- **provide the possibility to open the external website in an additional tab of the browser rather than** in the same one. This possibility allows the reader to keep the information previously consulted.

d. Translation into additional languages

Reviewers highlighted the relevance of having **coherent, complete and up-to-date translations** of the website in all its available languages. In this sense, the reviewers raised the following points:

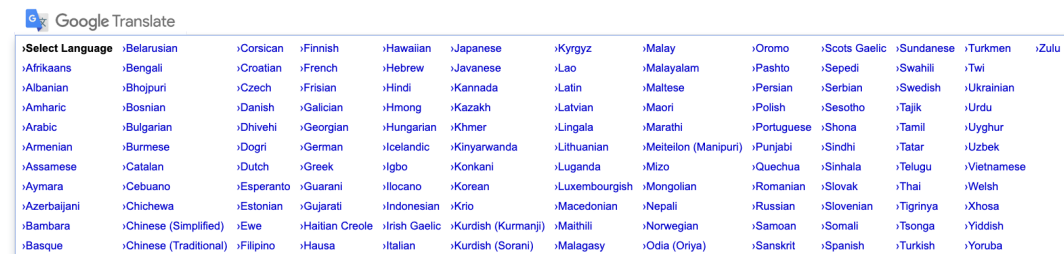
- The possibility to change between different languages on all webpages, rather than only on the homepage, allows a positive user experience.
- A relevant and inclusive geographical spread of the languages included, as well as the translation to non-EU languages is helpful, even if the translation only covers specific sections of the website rather than being a full translation.
- **The uniformity between the language versions** should be ensured. If some posting websites offer translation of some parts of

information (for example, summaries or specific sections only) into other languages, the difference between the information quantity in different language versions can lead the user to use an unofficial automated translation and thus risk the misinterpretation and incorrect information.

- To prioritise between the languages and select the most relevant for translation, the following actions can be taken:

- 1. analyse the number of employers posting their workers from different countries** to identify the biggest share of users;
- 2. analyse differences in nationalities of posted workers across sectors**, which might impact the relevance of the availability of certain sector-specific information in a particular language.

- To circumvent some of the issues in regard to the availability of information in different languages, the website can be made **compatible with available online translation plugins such as Google Translate or DeepL Translate**. The latter is a quick measure to provide a basic translation into another language, that allows for a broader language coverage.



1.1.2 Tips and tricks on findability and accessibility

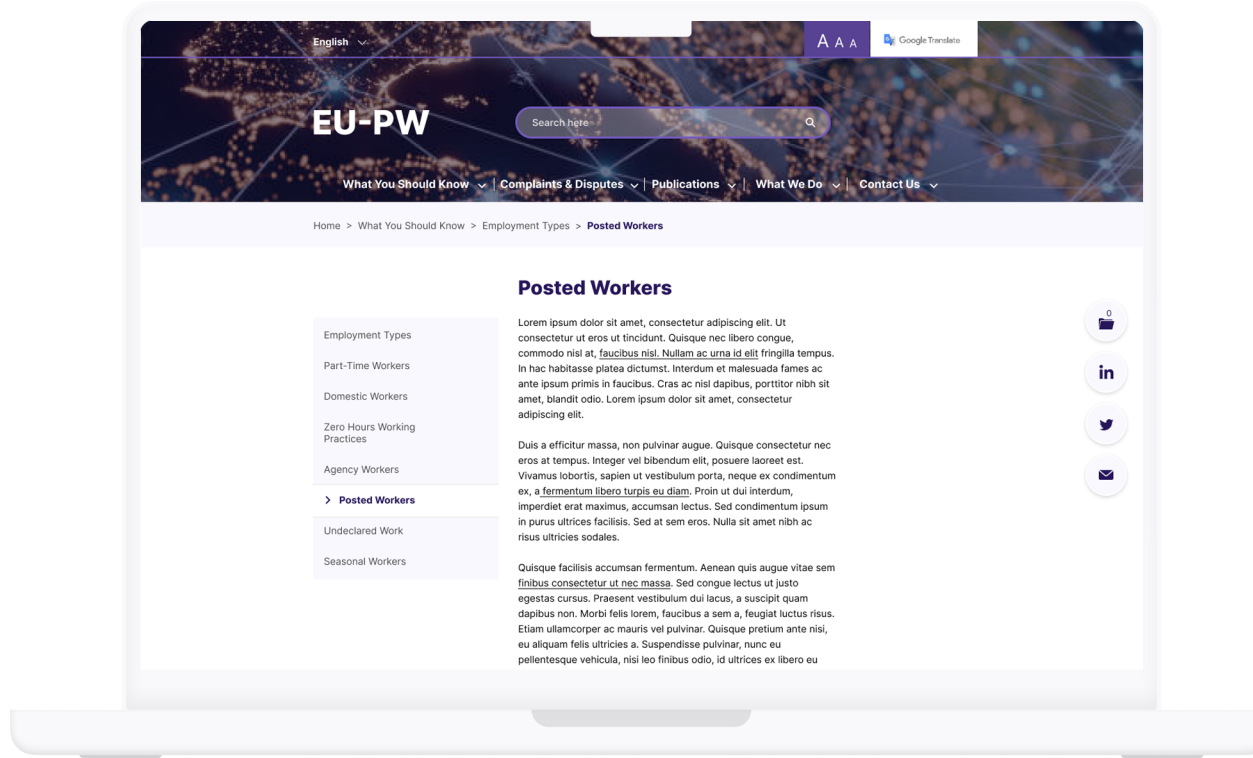
a. Tips and tricks for improving the findability

- Include a statement at the top of the website mentioning it is an **official national posting website** in order to avoid confusion with other similar websites.
- Include **meta tags** in English and all the relevant languages:
 - work in [Member State] for foreigners
 - work in [Member State]
 - posting to [Member State]
 - posting of workers to [Member State]
 - posted worker in [Member State]
 - employee's rights in [Member State]
 - rules for posting of workers in [Member State]
- Ensure that the relevant national governmental institutions' websites and the Your Europe Portal are **correctly linked to the official posting website.**



In order to provide information to the user who needs it, the first logical step is to ensure that the user can efficiently navigate through the abundance of resources on the Internet and find his/her way to the right posting website.





→ Create a **sub-page** on the website entirely **dedicated to the posting of workers**, if the website also provides information on different but related topics.

→ Ensure that a national website has a uniform and easy to remember domain such as **www.posting.MSname**.



b. Tips and tricks for enhancing accessibility

- Ensure that all headings are identifiable for **reading software**.
- Make sure the website is compatible with **external browser plug-ins** to adjust the font of the text and other customisations.
- Introduce **functions** and **presentation settings** that could **ease the accessibility** for people with disabilities.
- Adhere to the **requirements and standards set at European level** regarding accessibility, namely by taking advantage of the information gathered on the EC's Web Accessibility landing page.



To guarantee equal treatment and avoid discrimination, it is crucial to ensure that the websites and applications of public sector bodies are accessible to users, particularly those with disabilities.



c. Tips and tricks for an up-to-date website

- Ensure that the website's listed **contacts** and **links** are regularly **monitored** and **updated** accordingly.
- Incorporate in the website the **date of publication of the last update**.
- Should a relevant **legal change** occur, provide **additional information** on the website.



Maintaining a website that provides qualitative information to its users requires a continuous effort, as the legal landscape and context evolve regularly. It is therefore important to update the website as soon as these developments occur, but also to make the user aware of these recent or upcoming changes.



d. Tips and tricks for accessible contact points

- Clarify which specific **institution is responsible** for performing the function of national liaison office. When relevant, **provide contact details and links** to reach the **social partners**.
- Move the **contact details to a visible location** on the website, such as the main page or a dedicated section.
- Indicate the **languages** in which the contact point or national liaison office **can be reached**.
- Ensure a contact **link or button leads directly to the contact information**, rather than to another website which the user must navigate.
- Include the **country code** within any listed **telephone number**.



Even if all the information provided to the users is of high quality, they may still struggle with the complexity of the topic, or find themselves in a particular situation not covered by the content, or simply have a question. In that scenario, it is important to provide clear contact points to the user.



e. Tips and tricks to ensure relevant and useful translations

- Analyse differences in **nationalities across sectors**, which might impact the relevance of the availability of certain **sector-specific information** in a particular language.
- Provide language versions of the website in the languages of the **most frequently posted worker nationalities**.
- Consider the provision of additional language versions in **non-EU languages**, where relevant.
- Allow for the possibility to **change between the different available languages** on all webpages.
- Ensure compatibility of the **Google Translate plug-in** for all webpages of the website.
- Use the **ELA translation facility** to translate your text into the different relevant languages³.



As the whole concept of the posted worker revolves around the idea of going to work in a foreign country, it is important to take the linguistic differences into account, to ensure that the website meets the real needs (and language) of the users who consult it.

³ For details contact translation@ela.europa.eu.

f. Tips and tricks for synchronised and accurate language versions

- Assess the **accuracy of the current translations** of specific concepts and align with the relevant posting legislation.
- Ensure that the **search function** on the website also works with **key words** in additional languages.
- Ensure that the **entire page is translated**, and not just specific content, as the existence of headings and content in a mixture of languages can be confusing for the end-user.
- Ensure **uniformity between the national and other language versions** regarding all available content, including working and up-to-date links and contacts.
- **Translate relevant information** into additional languages, or **include a summary** or Frequently Asked Questions section when information in direct links is **only available in the national language**.



In addition to addressing the user's needs in terms of languages, it is also important to make sure navigating the website in a different language does not negatively impact the quality and consistency of the information.



1.2 User-friendliness

1.1.2 Key insights on user-friendliness

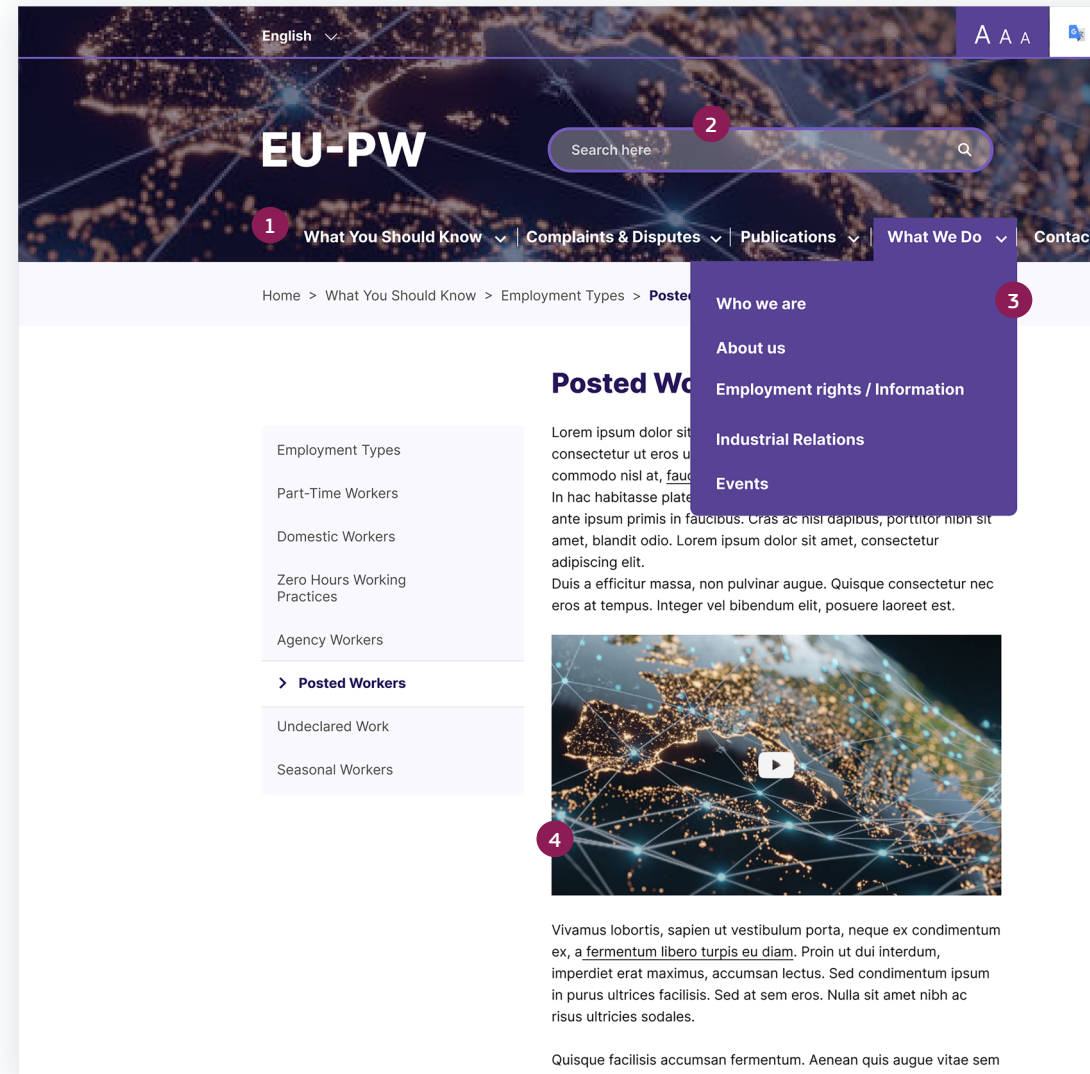
a. Look and Feel and user-friendliness of the layout

Reviewers considered website layouts that had a **simple and intuitive structure** as the most user-friendly. Websites highlighted as easy to navigate often included a **short side bar or a menu which were visible on every page**.¹ * These contained distinct headings and sub-categories instantly informing the user on which information to expect when clicking on the hyperlinks. Graphic symbols that are always visible on all websites to represent the categories have been found useful.

Other good examples to improve the navigation on the posting website included the **incorporation of a search tool for collective agreements**.² * and utilisation of **expandable and collapsible menus** to present information in an intuitive manner.

The use of **visuals and audio-visual content**.⁴ * related to the topic was deemed particularly user-friendly. This can include animated video clips presenting the content in a didactic and visual manner, or illustrative images or icons directly related to the topic covered in the section. Choosing a **minimalist layout for the website** and the use of spaced-out fonts to format otherwise compressed bodies of text were often suggested as solutions to enhance the visual attractiveness of the websites.

* visual example in the image on the right



Information should be **short and concise** rather than long blocks of text. To mitigate legal issues when simplifying the information presented, reviewers suggested to **break down information in shorter paragraphs or subsections**, and if possible, to **incorporate a visual hierarchy** ⁵* by highlighting key statements or using bullet points to summarise important information, next to providing links to the actual legal text. Particularly, the incorporation of a dedicated 'Important' section to highlight key information was singled out as a good example. Providing users with **abstracts or factsheets** summarising complex legal documents and legislation in a **straightforward, non-technical language** ⁶* can be also be considered as valuable solutions. Nevertheless, these documents must clearly state the precedence of the official text and be made available only in a non-binding and supporting capacity. This can for example take the form of a disclaimer: *'This summarised version of the original [legal text or webpage] is provided to the users for information and accessibility purposes only. In case of a discrepancy, the original [legal text or webpage] will prevail.'*

Furthermore, the **indication of the date of last update of the available information** ⁷* was considered a good example to ensure the user had the most accurate information.

b. Layout tailored to the end-user

A website that is designed with the specific user in mind and which structures (or splits) the information along the categories of users (i.e. employees and employers), allows for an intuitive user experience

* visual example in the image on the right

5 Lorem ipsum dolor sit amet, consectetur adipiscing elit. Ut consectetur ut eros ut tincidunt. Quisque nec libero congue, commodo nisl at, faucibus nisl. Nullam ac urna id elit fringilla tempus. In hac habitasse platea dictumst. Interdum et malesuada fames ac ante ipsum primis in faucibus. Cras ac nisl dapibus, porttitor nibh sit amet, blandit odio. Lorem ipsum dolor sit amet, consectetur.

You may also contact our Information and Assistance Service by using the 'Contact Us' page, or on 000 10 20 30 or 000 123 456

Agency Workers	Fixed-Term Workers	Part-Time Workers
6 Lorem ipsum dolor sit amet, consectetur adipiscing elit. Ut consectetur	7 Lorem ipsum dolor sit amet, consectetur adipiscing elit. Ut consectetur	8 Lorem ipsum dolor sit amet, consectetur adipiscing elit.

6 In the years following the adoption of the first Posted Workers Directive, between 2010 and 2014 the number of postings went up by

44.4%

7 Last update: March 21, 2023

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and for easily accessible information. To further improve the user-friendliness of the website, reviewers suggested to use sections for specific sectors (e.g. a section dedicated to the construction sector); or dedicated sections on provisions specifically targeting third-country nationals.

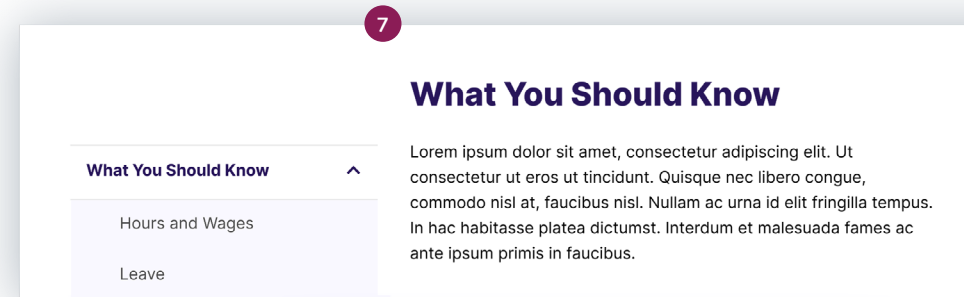
The reviewers mentioned it is relevant to present the information in an understandable manner by using simple and comprehensible terms, especially for the average user with little knowledge on the topic. Some suggestions include:

- **simplifying the headings and titles of sections;** ⁷ *
- **incorporating text boxes, icons, text in bold** to make the content more visually appealing; ⁸ *
- including a **Frequently Asked Questions** section. ⁹ *

Similarly, posting websites that were considered easy to navigate had **grouped information together into logical and thematic sections**, to ensure the end-user did not have to switch between sections to get complete information on a certain topic. This can for example be achieved by articulating the elements in the chronological order in which they would appear to be relevant for the reader, for example following a structure for employers similar to : *'Step 1: Before the posting of the worker'* ; *'Step 2: During the posting of the worker'*; and *'Step 3: After the end of the posting of the worker'*.

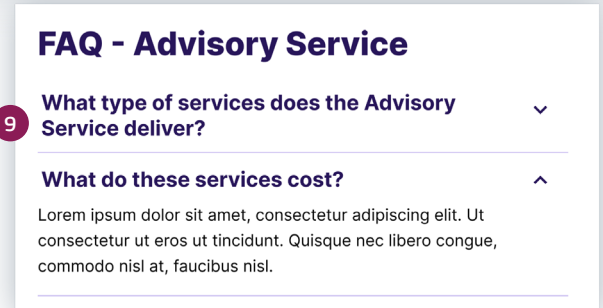
In a more elaborate way, the website could allow the readers to tick off their situation from a predefined list and present only the filtered information relevant to their individual situation. For example, an employee could select their country of origin, destination, the sector

* visual example in the image on the right



Day 5 Statement of Terms

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they work in and the period of posting and then only see the relevant sections.

The reviewers also referred to the use of summary documents on key information to enhance the website's user-friendliness. These summaries could be presented as **dedicated PDFs on several topics related to the posting of workers**, such as remuneration and working conditions in order for the user to have more concise information.

The **use of the same terminology throughout the website** allows for consistency, especially when key concepts are aligned with the terminology as presented in [Directive 2018/957/EU](#) and in national legislation. This also applies for the translation of the more specific concepts related to the posting of workers, such as remuneration.

1.2.2 Tips and tricks on user-friendliness

a. Tips and tricks for a user-friendly layout

- Keep the **navigation bar or menu short**, to ensure the user does not have to scroll down to see all topics, and keep the navigation bar or menu **visible** when scrolling down the content on the page. **10** *
- Ensure that the **phrasing of the headings is clear** and avoid placing information on posting under headings not directly connected to the topic. **11** *
- Opt for a **minimalistic, logical and thematical layout** when structuring the website. **12** *
- Incorporate a **menu or sidebar** which highlights main themes and headings. **13** *
- Optimise the **look and feel** of the website by implementing visuals, infographics, different font styles, and dynamic buttons, menus and boxes. **14** *
- Utilise **expandable and collapsible menus** to present information in an intuitive manner. **15** *

* visual examples on the next page



One of the first impressions left with the users occurs as soon as they enter the website, when they discover its layout. In order for the content to be effectively conveyed to the user, it is important to focus on the look and feel while making the navigation intuitive.



- Employment Types
- Part-Time Workers
- Domestic Workers
- Zero Hours Working Practices
- Agency Workers

Posted Workers

- 15 What is a posted worker?
- Where should I submit my Form of Declaration?

- Undeclared Work
- Seasonal Workers

10 Lorem ipsum dolor sit amet, consectetur adipiscing elit. Ut consectetur ut eros ut tincidunt. Quisque nec libero congue, commodo nisl at, faucibus nisl.

What is a posted worker?

A "posted worker" is an employee who is sent by his/ her employer to carry out a service in another EU Member State on a temporary basis.

Where should I submit my Form of Declaration?

Address:

Posted Worker Department
Official Workplace Commission
15 Smith Road
European

Email:

Infopostedworkers@officialworkplacecomission.eu



b. Tips and tricks for a user-friendly website structure

- Create a **sub-page** on the website entirely **dedicated to posting of workers** ¹⁶* if the website also provides information on different topics.
- Create distinct **sections tailored to the users** ¹⁷* (such as workers and employers) containing relevant information for the group in question.
- Consider implementing a dedicated **'Important' section** ¹⁸* to highlight key information.
- Integrate a **search function** ¹⁹* into the website to allow users to find information using keywords.
- Ensure that information on **one topic** (for example remuneration) is located in **one dedicated section** ²⁰* rather than dividing the information up in different webpages.

* visual examples on the next page



Posting of workers information is often hosted on websites containing information about other topics. Even if the website is only dedicated to posting, the multitude of topics covered makes it essential to properly articulate and structure the themes and sections, making sure that each information has its place and is integrated in a coherent whole.



What is a Posted Worker?

What guidelines apply to workers posted in our country?

What is the Form of Declaration?

20

Remuneration, Sick Pay and Pension Obligations

I am an employee, what should I know about Posted Workers?

Other relevant information

Posting of Workers - Official Workplace Commission

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What is a posted worker? 17

A **"posted worker"** is an employee who is sent by his/ her employer to carry out a service in another EU Member State on a temporary basis. Council Directive 96/71/EC defines a posted worker as a 'person who, for a limited period of time, carries out his or her work in the territory of an EU Member State other than the State in which he or she normally works'. The definition does not include individuals who decide of their own accord to seek employment in another Member State, seagoing personnel in the merchant navy or the self-employed.

What guidelines apply to workers posted in our country? 18

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The key measures introduced in these Regulations include:

- Lorem ipsum dolor sit amet, consectetur adipiscing elit
- Lorem ipsum dolor sit amet, consectetur
- Nullam ac urna id elit fringilla tempus.


Attention!

The submission period for your Form of Declaration is coming to an end. Please check the relevant information on this page, download the form or contact infopostedworkers@officialworkplacecommission.eu if you have any questions.

What is the Form of Declaration?

The Form of Declaration is a document used for the Official Workplace Commission to monitor your posting activity and ensure the compliance of your application with posting rules.

Download the Form of Declaration 

Download Guidance on how to complete Form of Declaration 



c. Tips and tricks for clear and concise content

- Incorporate **visual hierarchy** ¹⁸* to highlight the most important information and elements in regard to the presentation of legal texts or any other type of information. This can be done by using bullet points, tables or other forms of visible accentuation, which will make longer texts more digestible.
- **Refine the layout, font and spacing of the text**, if the existing format is too compressed.
- Implement a **Frequently Asked Questions** section.
- Split the available information into relevant **sub-sections** if an existing section contains an extensive amount of information.
- **Simplify** some of the provided information on topics heavily relying on legislative acts and provisions into **easy-to-understand** language. Review and align the wording of specific concepts related to the posting of workers with the utilised terminology in relevant posting legislation. Always keep in mind the end-user: workers and companies (often small companies which do not regularly post workers abroad).
- Create **summaries** of the most important information at hand in a more **simplified manner** next to the official legal text with an easily accessible link to the virtual 'booklet' or 'leaflet'.

* visual examples on the previous page



The often dense and complex text paragraphs containing the information destined to the user can be made considerably more readable and comprehensible if they are properly structured and complemented with adequate supporting material.



1.3 Content

1.1.3 Key insights on content

a. Information on remuneration

Overall, reviewers positively assessed websites that provided **clarification on the type of system in place regarding remuneration**. This can for instance be achieved by mentioning whether there is a statutory minimum wage or whether there are any universally applicable collective agreements for certain sectors.

Presenting information on remuneration based on an extensive amount of collective agreements was highlighted as a good example by the reviewers, as it relied on **close collaboration with the social partners**, who provided specific and tailored information for certain sectors.

Other good examples to ease the navigation of information on remuneration within various collective agreements were identified by the reviewers, namely providing the **possibility to search within a register of collective agreements** related to posted workers and the use of **factsheets or leaflets summarising information** on remuneration within collective agreements in a more simplified manner next to the official legal text. Additionally, providing direct links to websites of social partners to obtain further information on specific wages was also considered a good example by the reviewers.

Where a statutory minimum wage applied, reviewers positively assessed the inclusion of **information on the calculation** of remuneration, such as the gross minimum wage per hour next to the minimum gross wage per category and occupational group or sector, as well as further information regarding agreed additional remuneration. It was recommended by the reviewers to list the minimum wages in Euros, next to the national currency, where applicable. A good example to illustrate the wage components was the **use of tangible examples of wage calculations** based on the applicable provisions. The inclusion of a wage calculating tool or guide is considered exemplary by some reviewers while others voice their concerns regarding the meaningfulness of such a tool (considering many factors that establish the individual minimum wage and the resulting possibility of misleading the information seeker).

A common point for improvement as pointed out by the reviewers was the provision of information in additional languages, especially regarding collective agreements. As some Member States have large amounts of collective agreements, a commonly suggested solution by the reviewers was to **provide a summary of the collective agreement** in additional languages, with particular focus on remuneration aspects.

b. Information on long-term posting

The placement of the information on long-term posting in a separate, **designated section with a recognisable header**, such as 'long-term

posting’, was deemed a good example, as it increased the findability of the correct information.

In terms of completeness, information on long-term posting was regarded by the reviewers as adequately provided and exhaustive when it included:

- the concept of posting of workers as explained within the meaning of [Directive 2018/957/EU](#);
- the difference between the general provisions and the special scheme for long-term posting;
- a detailed list of the applicable terms and conditions for the different periods within long-term posting;
- information on the extension of the 12-months period to 18 months;
- the rules in case of replacement of one posted worker with another.

Next to the alignment with [Directive 2018/957/EU](#), the reviewers also considered attention to applicable national legislation an important element for providing accurate information on long-term posting. A posting website could also generally be highlighted as a good example when featuring an **overview of relevant information from national legislation related to long-term posting**, including relevant additional provisions from applicable collective agreements

next to the general provisions on the posting of workers after 12 and 18 months.

Additional elements to further improve the information on long-term posting as suggested by the reviewers were additional employment conditions for long-term posting and practical information on where and how to extend the 12-months period.

As with other sections related to content, the reviewers pointed out the added value of providing the information in additional languages. A commonly suggested solution in this regard was to explore the possibility of **implementing Frequently Asked Questions** section related to the contents of the labour code or the applicable collective agreements.

c. Information on the declaration obligation

During the peer review process, the reviewers found information on the declaration obligation to be complete in the following instances:

- The declaration obligation provides clear instructions on how to submit or amend the declaration, and information on the relevant deadlines. The websites also incorporate an example of the form filled and information regarding the languages in which the declaration may be submitted.
- The **posting declaration portal is clearly visible in the text through direct links**.

- The **access to the posting declaration portal is possible through several authentication methods** and users do not need to rely on external service providers to submit the declaration form.
- The information on the declaration obligation is easily findable due to separate headings for this subject or by being located under sections describing the duties for employers.

The reviewers also provided some attention points to improve the completeness and findability of the information on the declaration obligation:

- **If the name of the section is too technical for non-specialised users or lacks clarity, rename the section to reflect the fact that it regards the declaration obligation;**
- **Highlight the existing links** to the electronic notification system and add a direct link to access the information on the declaration obligation for self-employed people;
- Allow users to be able to **submit the declaration form in additional languages.**



1.3.2 Tips and tricks on content

a. Tips and tricks for detailed information on remuneration

- Include a clear message on the (non)existence of **universally applicable collective agreements**.
- If applicable, provide an overview of the **sectors** for which **collective agreements** exist.
- Include a **summary** of the most important elements of the **collective agreements** as well as a **direct link** to the text⁴.
- Provide all applicable information on remuneration, including the **minimum gross wage**, its various **components** and the **methods and qualifying criteria** regarding the classifications in the different wage categories.
- If possible, include a tool for calculating wages or a simple example of **wage calculations** based on the applicable provisions, divided by different occupational groups.
- Clarify whether collective agreements are also applicable for posting **exceeding 18 months**.

⁴ Regarding the presentation of information on collective agreements, [ELA's approach](#) is a useful resource.



Remuneration is an important theme when it comes to the posting of workers, as the rules and conditions vary considerably from one Member State to the other. It is also an area where it is crucial to inform the users correctly so that they can uphold their rights and obligations.



b. Tips and tricks for detailed information on long-term posting

- Extend the provision of information on the conditions regarding long-term posting in line with [Directive 2018/957/EU](#).
- Clarify which working conditions apply for **short-term posting** and which for posting exceeding **12/18 months**.
- Keep information on long-term posting in **one place**, preferably in a **separate section** to ensure that there is a clear distinction between the applicability of certain working conditions when it comes for long-term posting.
- Add information about the rules in case of **replacement of a posted worker**.



In view of the different modalities and rights applicable to the types of posting, it is important to pay particular attention to the way in which the information on the subject is presented and to its completeness, especially when it comes to the applicable legislation.



c. Tips and tricks for detailed information on the declaration obligation

- Ensure the declaration procedure is also **available in additional languages** and specify beforehand in which languages it is available.
- Provide the possibility to **submit the declaration form digitally** within the declaration portal as well as physically.
- Include a **step-by-step description** of the submission procedure and the **availability to preview** the posting declaration in a visible location on the page.
- Improve the **visibility of the declaration tool or platform** with a clear heading or by including a direct link in every section related to the declaration obligations.
- Ensure that the declaration form is in a **downloadable and editable format**.



The declaration obligation stands out from other content elements due to its interactive nature. It is generally for the purpose of completing the declaration that users visit the website, and therefore they generally expect to be able to do so efficiently and with ease.



d. Tips and tricks for a user-friendly declaration portal

- Provide the possibility to **modify the declaration** when justified change takes place – for example, in case of short-term absence of the employee (e.g. illness) and to replace the employee in the portal.
- Ensure that it is possible to **temporarily save entries in forms** to ensure data does not need be entered again when changing, revising, or submitting the declaration later.
- Ensure that **trivial errors** in online forms (such as dots instead of hyphens in dates and spelling mistakes) do not result in **failure to submit** the form.

Ensure that the declaration portal is accessible through several **authentication methods** and is without lengthy prior registration. The authentication methods can for example include logging in via eIDAS, or any similar simple but secure method.

- Include a **confirmation of receipt** to indicate whether the submission of the declaration was received or not, which can be directly emailed to the client.
- Allow the **reuse of data** introduced in previous declarations.



The submission process can be greatly improved by the implementation of an interactive and secure portal or application. This grants the users access to features that significantly reduce the administrative burden and improve their experience, especially for users who regularly submit declarations.



2.

Optimal User Journeys

This section presents an aggregate of the results of the observation sessions carried out in the process of the peer reviews. This aggregate takes the form of an 'optimal' User Journey which depicts the entirely positive scenario of a fictional user looking for information on a Member State's posting website. Both the employer's and employee's perspectives are represented.



2.1 Optimal User Journey - Employer



USER JOURNEY-EMPLOYER

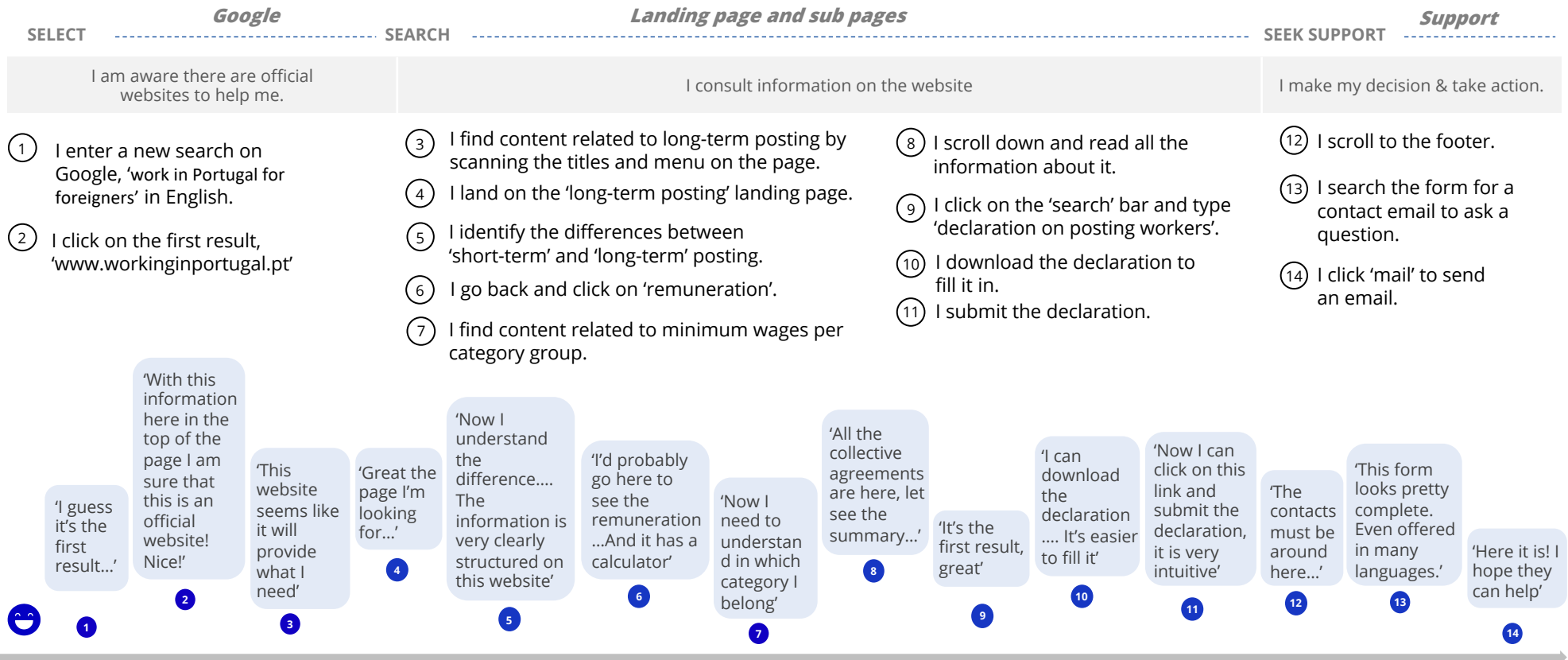
Hans Green

BIO

Hans is an employer and needs to post one of his workers to Portugal. He wants to know more about remuneration, long-term posting, and the declaration he's legally obligated to submit to the responsible national competent authorities in Portugal.

EXPECTATIONS

- Clear online information
- Availability of the declaration obligation
- Helpful support for queries



2.2 Optimal User Journey - Employee



USER JOURNEY-EMPLOYEE

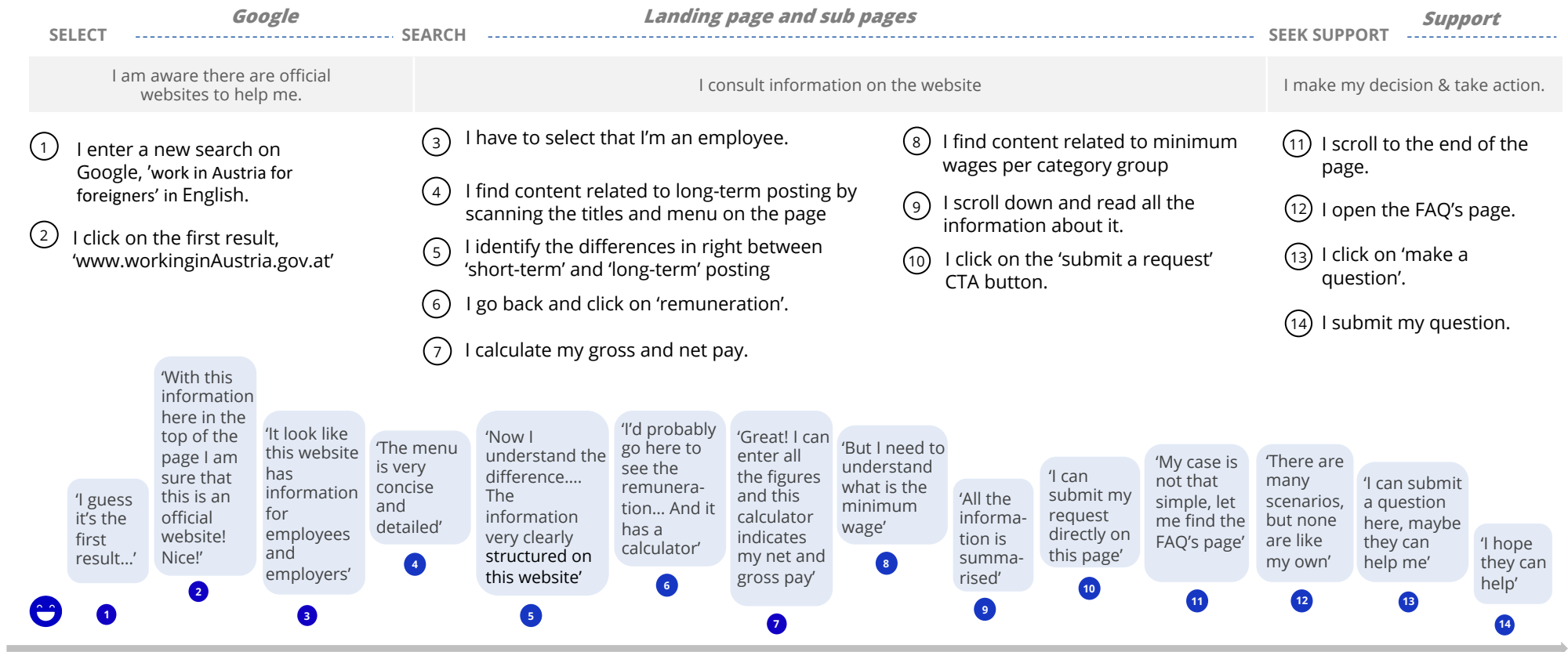
Deborah Sun

BIO

Deborah is an employee and will be posted in Austria. She wants to know more about the conditions of posted workers, especially regarding remuneration, the possibility of long-term posting, as well as the declaration her employer will have to submit to the responsible national competent authorities.

EXPECTATIONS

- Easy to find online information
- Intuitive navigation
- Helpful support for queries



3.

Annexes

This section presents a glossary of the terms used throughout the document, as well as an overview of the EU applicable legislation.

3.1 Glossary

Collective agreements

These are agreements setting a series of minimum requirements regarding the terms and conditions of employment for the employees in a specific profession, company or sector. These requirements can include elements such as minimum wages, working schedules, or benefits. These agreements are negotiated and concluded between employee's unions and either a single company or associations of employers in a specific Member State. Their geographical delimitation can either be the whole national territory or only certain regions. When a collective agreement covers all workers of a certain sector or branch and the whole national territory, it is referred to as a universally applicable collective agreement.

Declaration obligation

The obligation for the employer to declare the posting of its employee in another Member State. This declaration can usually be completed by filling in a form issued by an official agency or government body of the Member State of destination, either electronically or in paper form.

ELA

The European Labour Authority ensures that EU rules on labour mobility and social security coordination are enforced in a fair and effective way and makes it easier for citizens and businesses to reap the benefits of the internal market.

Long-term posting

Posting of worker longer than 12 months (or 18 months if the employer submits a motivated notification to the worker's host country's national authorities) based on [Directive 2018/957/EU](#). In the case of long term posting, all relevant terms and conditions of the worker's employment in his or her host country apply, except for the terms relating to the termination of the work contract and supplementary working pensions.

Meta-tags

Elements used in HTML and XHTML documents, which provide additional data about the content on the specific webpage. Search engines use meta-tags to understand the content of webpages, create snippets for the purpose of search results, and for the purpose of ranking webpages.

NLO

National Liaison Offices are entities set up in each Member State to serve as contact points for the authorities of the Member States, companies that post workers, and posted workers themselves. The main tasks of NLOs are to make the information on the terms and conditions of employment available, to monitor the compliance with the terms and conditions of employment referred to in the directive, to reply to requests from public authorities for information on the transnational hiring-out of workers, and to examine eventual difficulties arising in the application of public policy provisions.

Portable document A1 / PD A1 form

A portable document certifying the social security legislation which applies to a posted worker and confirming the person has no obligations to pay contributions in another Member State. Used in situations where an employed or self-employed person has a connection through their employment or self-employment with more than one EU country.

Posting of workers

The process of sending an employee to work temporarily in another EU country. During this period, the employee acquires the status of a posted worker and will benefit from the same basic working conditions and rights as workers in his or her host country. Posting can last as long as it is necessary to complete a specific task. When the posting has finished, the employee should return to his or her workplace in the EU country where he or she was posted from.

Reading software

Any kind of text-to-speech electronic software allowing a user to transform written text into an audible version. This may take the form of a webpage add-in, or dedicated smartphone or tablet application.

Search Engine Optimisation (SEO)

It is the practice of optimizing a website or web page so that it can be more easily found, indexed, and ranked by search engines like Google, Bing, and so on. The goal of SEO is to increase the quantity and quality of traffic to a website through organic search results.

Short-term posting

It refers to the posting of workers not exceeding 12 months. If the posting takes place in an EU Member State, the posted employee does not need an official work permit or recognition of his or her professional qualifications by an official body. Moreover, when posted on a short-term basis, the employee does not need to register with social security authorities in the country of posting, since he or she remains insured by the country of regular employment. If posted for longer than 3 months, the employee must register his or her residence with the authorities of the host country. This, however, will not grant him or her the right to permanent residence in the host country.

Statutory minimum wage

It refers to all minimum wage fixing mechanisms other than those set through collective agreements. This may include minimum wages set through the decision of a competent authority; decisions of wage boards or councils; or industrial or labour courts or tribunals⁵.

⁵ https://www.ilo.org/global/topics/wages/minimum-wages/setting-machinery/WCMS_458687/lang--en/index.htm

User Journey

A user journey is a unique path that each website or application user takes to navigate a particular website. The goal of designing a successful User Journey is to enable the user to reach their goal as quickly and easily as possible.

3.2 Legislation related to posting of workers and online information provision - overview

Directive 96/71/EC

Directive 96/71/EC is the fundamental EU directive concerning the posting of workers in the framework of the provision of services. It defines the status of the posted worker and lists general applicable rules that need to be followed in the case of posting.

Directive 2018/957/EU

Directive 2018/957 further defines the general concept of posting of workers introduced by Directive 96/71/EC and points to the specific laws applicable to the posted employee. Moreover, the Directive points to the difference between short-term and long-term posting, and points to the specific regulations pertaining to each case. The Directive also states the obligations of Member States in respecting the regulations concerning the posting of workers, and sets out practices for the monitoring and control of the decisions within the Directive.

Directive 2014/54/EU

Directive 2014/54 seeks to increase the efficiency of enforcement of the already existing rights for the substantive rights of workers, referring to work and employment, social affairs and taxes, education and housing. The Directive requires Member States to guarantee mobile workers to exercise the rights guaranteed by this document in court. Additionally, the Directive obliges Member States to designate a public body “for the promotion, analysis, monitoring and support of equal treatment of Union workers and members of their family without discrimination on grounds of nationality, unjustified restrictions or obstacles to their right to free movement”.

Directive 2014/67/EU

Directive 2014/67 concerns the posting of workers in the framework of the provision of services and enforces Directive 96/71/EC and amends Regulation (EU) No 1024/2012 on administrative cooperation through the Internal Market Information System (‘the IMI Regulation’). Its aim is to guarantee respect for an appropriate level of protection of the rights of posted workers for the cross-border provision of services, while facilitating the exercise of the freedom to provide services for service providers and promoting fair competition between service providers, and thus supporting the functioning of the internal market.

Directive 2016/2102/EU

Directive 2016/2102 focuses on ensuring the accessibility of the websites and mobile applications of public sector bodies, including websites, mobile apps, intranets and documents of public sector bodies. Its aim is to standardise accessibility laws across the entire EU. While the Directive describes minimum accessibility requirements, individual Member States can also make more far-reaching regulations.
