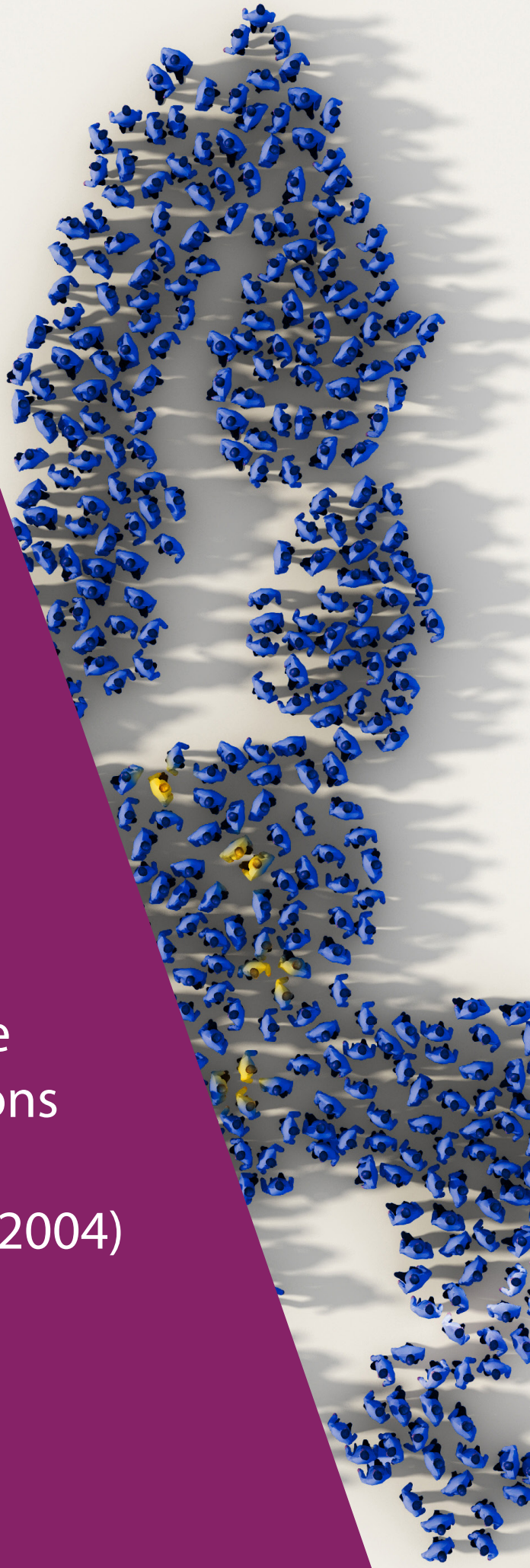
Report on overview and analysis of Member States' tools, processes and procedures related to the administration and issuance of Portable Document A1 in situations of posting (Article 12 of Regulation (EC) No 883/2004)



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Contents

Lists of tables, figures and boxes

Abbreviations

List of abbreviations

ABV	Arbeitsgemeneinschaft berufsstandischer Versogungseinrichtungen (Germany)
API	application programming interface
CJEU	Court of Justice of the European Union
Dimona	Déclaration Immédiate/Onmiddellijke Aangifte (Belgium)
DLA	determination of legislation applicable
DRV	Deutsche Rentenversicherung (Germany)
EEA	European Economic Area
EESSI	electronic exchange of social security information
e-ID	electronic identification
eIDAS	Electronic Identification, Authentication and Trust Services
ELA	European Labour Authority
ESSPASS	European Social Security Pass
GKV	Gesetzliche Krankenversicherung (Germany)
IMI	internal market information
ÖGK	Österreichische Gesundheitskasse (Austria)
PD A1	Portable Document A1
QR	quick response
RSVZ	Sociale Zekerheid Zelfstandige Ondernemers (Belgium)
RSZ	Rijksdienst voor Sociale Zekerheid (Belgium)
SODRA	Valstybinio socialinio draudimo fondo valdyba (Lithuania)
SVB	Sociale Verzekeringsbank (Netherlands)
SVS	Sozialversicherungsanstalt der Selbständigen (Austria)
TGSS	Tesorería General de la Seguridad Social (Spain)
TWA	temporary work agent
URL	uniform resource locator
VAT	value added tax
ZUS	Zakład Ubezpieczeń Społecznych (Poland)

List of country codes

AT	Austria	**FI**	Finland	**NL**	Netherlands
BE	Belgium	**FR**	France	**NO**	Norway
BG	Bulgaria	**HR**	Croatia	**PL**	Poland
CY	Cyprus	**HU**	Hungary	**PT**	Portugal
CZ	Czechia	**IE**	Ireland	**RO**	Romania
DE	Germany	**IT**	Italy	**SE**	Sweden
DK	Denmark	**LT**	Lithuania	**SI**	Slovenia
EE	Estonia	**LU**	Luxembourg	**SK**	Slovakia
EL	Greece	**LV**	Latvia		
ES	Spain	**MT**	Malta		

1. Executive summary

This study presents a comprehensive mapping and analysis of the tools, processes and procedures employed by EU Member States and European Economic Area (EEA) countries in administering and issuing Portable Document A1 (PD A1) certificates, with a primary focus on posting situations under Article 12 of Regulation (EC) No 883/2004 ([1]). Drawing on structured questionnaires, interviews with national institutions and desk research, the study covers 28 countries and 32 institutions responsible for PD A1 issuance, providing an empirical basis for understanding current assessment practices, digitalisation efforts and control mechanisms across Europe.

The analysis addresses three core objectives: (1) compiling a detailed inventory of digital applications and online portals used for PD A1 issuance; (2) analysing grounds for assessment, including data elements, information sources and their associated administrative workload for both applicants and institutions; and (3) reviewing the control, verification and anti-fraud mechanisms that are used when processing PD A1 applications. This multidimensional approach reveals both significant progress in digitalising PD A1 procedures and persistent challenges in achieving harmonised, efficient administration of posting rules across Europe.

Digitalisation of application procedures

Online portal availability has become the norm, with 88 % of institutions (covering 98 % of PD A1 certificates) operating online portals for Article 12 applications. Most portals process applications under multiple articles (i.e. Articles 12, 13 and 16), employing strong authentication mechanisms combining national electronic-identification (e-ID) systems, business registration checks and bank-ID systems. However, foreign authentication remains inconsistent, resulting in practical barriers for cross-border employers.

Fully online application processes are standard in 79 % of institutions (89 % of PD A1 certificates), with automatic acknowledgement being near universal. Issuance decisions are delivered electronically by 75 % of institutions (95 % of PD A1 certificates), though postal delivery persists as a fallback. The prevalence of user-friendly features varies significantly: prefilled forms (71 % of portals), integrated help functions (54 %), real-time status tracking (29 %), multilingual support (39 %) and bulk requests (16 %).

Processing times can range from being near instant to taking several weeks. Fast-track systems achieve decisions within 24 hours through strong authentication, data reuse, legal rules engines, plausibility checks and overlap detection. Institutions reporting high automation (28 %, covering 24 % of PD A1 certificates) typically issue 50–80 % of certificates automatically using deterministic, rule-based checks, while 38 % report no automation. The remaining institutions report either moderate automation (22 %, covering 57 % of PD A1 certificates) or limited automation (13 %, covering 9 % of PD A1 certificates). Interconnection with the electronic exchange of social security information (EESSI) system is widespread (covering 50 % of institutions), though advanced anti-forgery features remain limited to 19 % of institutions.

Grounds for assessment and administrative workload

There is widespread consensus among the national institutions reviewed regarding the verification of the essential geographic and temporal data elements of a posting. All institutions collect start/end dates and host country names and check them against previous posting periods for employed persons, with similar convergence for self-employed assessments. These checks occur almost exclusively *ex ante*.

However, there is significant variation in the assessment of the more informationally substantive posting conditions for employed persons. Regarding the **employer's substantial activity**, while checks on the company's registered office are generally consistent (83 % of institutions, 90 % of PD A1 certificates), the financial indicators are less so. For instance, turnover is checked by 53 % of institutions (covering 80 % of PD A1 certificates), while company establishment length is checked by 53 % of institutions but applies to only 32 % of PD A1 certificates. Concerning the **direct relationship**, the obligation to pay remuneration is examined by 63 % of institutions (82 % of PD A1 certificates), whereas the verification of disciplinary action and worker placement remains inconsistent. The employed person's **prior affiliation** with the period of social security coverage under the legislation of the posting state is verified by nearly all institutions (97 %, affecting 99 % of PD A1 certificates), and the **replacement ban** is assessed by a majority (70 %, affecting 75 % of PD A1 certificates).

([1]) While the PD A1 certificate is also issued in other situations, such as for persons pursuing activities in two or more Member States (Article 13 of Regulation (EC) No 883/2004), the scope of this report is centred on the specific procedures related to posting under Article 12, which constitutes the vast majority of cases.

For **self-employed persons**, maintaining an office (77 % of institutions, 94 % of PD A1 certificates) and tax verification (63 % of institutions, 85 % of PD A1 certificates) show moderate convergence among the national institutions, while there is notable divergence in the requirement to register with professional bodies, which is checked by 40 % of institutions yet affects 90 % of PD A1 certificates.

The results of the analysis indicate a heavy reliance on applicant-provided declarations across most assessment grounds for obtaining information. However, the verification of previous posting periods demonstrates the strongest use of administrative registers, with this data element being checked via internal registers of the issuing institutions for 38 % of PD A1 certificates (21 % manually, 17 % automatically).

Multidimensional administrative workload scores are constructed for applicants and institutions along dimensions such as complexity of required information, degree of portal usability and automation, and verification effort. Analysis reveals that administrative workload varies significantly among institutions. For applicants, countries with the lowest applicant workload include Spain, the Netherlands and Finland, whereas countries such as Latvia, Hungary and Sweden score on the higher end, indicating a greater workload. For institutions, low-workload countries include Luxembourg, Austria and Finland, whereas high-workload countries include Bulgaria, Croatia and Latvia. Overall, eight countries achieve low workload for both dimensions and 10 exhibit high workload for both, while others show asymmetric patterns.

Control mechanisms and anti-fraud measures

The comparative analysis confirms that, while control mechanisms for PD A1 certificates are widespread, they vary significantly across Member States and EEA countries. While most institutions conduct both *ex ante* and *ex post* verifications, the level of automation varies widely, ranging from highly automated systems with integrated red flagging tools to largely manual processes. Contestations of PD A1 certificates and reassessments of the posting conditions are relatively rare, but when they occur, they typically require cooperation between social security institutions, labour inspectorates and tax authorities. This process is often time-consuming and resource-intensive.

Cross-border cooperation is strongly anchored in the EESSI system, which serves as the cornerstone of verification practices. The compulsory notification of posting details via the LA_BUC_04 process in the EESSI system, which has been implemented by all countries concerned since July 2021, is a key mechanism for PD A1 verification and fraud prevention. Most institutions use the EESSI system as the primary tool for exchanging information and cross-checking data, often complemented by direct exchanges via the internal market information (IMI) system, email or phone, and manual verification through official channels. The study reveals growing reliance on online verification portals, though uneven availability creates asymmetries across Member States, while quick response (QR) code verification remains limited to a handful of countries.

Regarding the use of anti-fraud measures, data matching with internal and external registers is most widely used (17 institutions), while more advanced approaches remain underutilised: risk assessment models (three institutions), algorithms (two institutions) and suspicious pattern scripts (two institutions). Most institutions rate measures as moderately effective, constrained by reliance on applicant-provided information and fragmented responsibilities. Significant gaps exist in the availability of fraud statistics, with only Spain and Poland reporting. The main causes of non-compliance include failure to demonstrate substantial activity, lack of prior affiliation, misclassification of employment status and difficulties applying the replacement ban.

Priority areas for improvement

The study identifies key priority areas for improvement aligned with the findings. These are grouped into two categories: those related to the issuance of PD A1 certificates (digital tools and assessment grounds) and those related to its control (verification and anti-fraud measures).

Potential improvements on PD A1 issuance include the following.

- The European Commission should establish a single, publicly available, EU-wide register of national PD A1 online portals to increase awareness and accessibility of these digital channels.
- Member States should enhance their online portals with features that demonstrably reduce applicant workload, such as prefilling of data, real-time status tracking and bulk request capabilities, while expanding multilingual support. This should be backed up by the exchange of good practices related to PD A1 portals facilitated by the European Labour Authority (ELA).

- ELA should identify and promote successful cross-border authentication solutions to help Member States develop simplified and accessible pathways for foreign users and also support multilingual features of PD A1 portals by providing translation facilities.
- ELA should provide targeted technical assistance and share portal models to support the remaining Member States in developing their own online application systems.
- Member States should establish formal data-sharing agreements and channels between national authorities to make the posting information available to enforcement bodies and ensure the automated triggering of ESSSI system notifications becomes a standard practice to guarantee reliable and timely data exchange.
- Member States should expand automated verification by developing API (application programming interface) connections to national databases and implementing rules-based engines, a transition that ELA can facilitate through the exchange of good practices on innovative digital solutions.
- The Administrative Commission for the Coordination of Social Security Systems (Administrative Commission), supported by the ELA's capacity-building activities like training programmes and structured exchanges, should provide more detailed guidance on ambiguous legal terms to foster a common understanding among national institutions.

Potential improvements on PD A1 control include the following:

- Member States should reduce their reliance on applicant declarations by increasing systematic, automated cross-checking against administrative registers;
- leveraging the uniformity of posting criteria, ELA should facilitate the sharing of good practices on advanced anti-fraud approaches, such as risk assessment models and algorithms, through thematic workshops;
- Member States should foster stronger coordination and data sharing between social security, labour and tax authorities;
- ELA should support Member States in adopting layered verification systems, which may include the integration of the EESSI system, online portals, QR codes and the European Social Security Pass (ESSPASS), by organising thematic meetings and facilitating study visits to share know-how;
- the implementation of targeted awareness-raising measures and guidance materials could help to reduce administrative mistakes and raise awareness of compliance requirements among users;
- in cooperation with the Administrative Commission and its Steering Committee on Fraud and Error, a common standard could be developed to ensure more consistent collection of data on PD A1 fraud, contestations and withdrawals in order to enable more accurate risk assessments.

2. Introduction

2.1. Study context and legislative background

Regulation (EC) No 883/2004, alongside its implementing **Regulation (EC) No 987/2009**, establishes the principle of *lex loci laboris*, according to which individuals are typically insured in the Member State where they work. Article 12 of Regulation (EC) No 883/2004, however, provides a critical exception for temporary posting. It allows workers sent temporarily by their employers (or self-employed individuals pursuing similar activities) to another Member State to retain their social security coverage in the sending Member State. This mechanism is essential to facilitating the free movement of workers and services, a fundamental element of the single market, as it reduces administrative complexities and avoids overlaps or gaps in social security coverage that could otherwise hinder temporary cross-border assignments.

The application of this posting exception involves specific conditions, commonly referred to as **posting prerequisites**, intended to guarantee the temporary nature of assignments and maintain genuine links among the worker, employer and sending Member State. These prerequisites, detailed within the regulations and further clarified by interpretative instruments such as **Decision A2** ([2]) of the Administrative Commission and the accompanying practical guide, have also been shaped significantly by the case-law of the **Court of Justice of the European Union (CJEU)**. The CJEU's case-law particularly highlights the binding nature of the PD A1 certificate while simultaneously obliging issuing institutions to rigorously assess facts to ensure the accuracy of the document.

Despite this shared legal framework, significant variations exist across national authorities regarding PD A1 application and issuance processes. These differences may result from deliberate national strategies, specific administrative contexts, degrees of digitalisation, availability and interoperability of relevant national registers and databases, and the operational capacities and resources of competent institutions. Assessing numerous factual elements for each application often generates considerable administrative workloads for both institutions and applicants (employers and self-employed persons). Consequently, many Member States have adopted simplified or risk-based approaches, frequently prioritising *ex post* verification over comprehensive *ex ante* checks, thereby further contributing to divergence in practices.

The PD A1 landscape is also influenced by the ongoing digitalisation of public services throughout Europe. **Regulation (EU) 2018/1724, the Single Digital Gateway Regulation** ([3]), mandated Member States to fully digitalise key administrative procedures, including applications for determining applicable social security legislation (resulting in the PD A1) by December 2023. Complementing this legislative initiative, the Commission's **2023 communication on digitalisation in social security coordination** ([4]) underlines the imperative of leveraging digital solutions to enhance administrative efficiency and cross-border cooperation.

It is within this complex and evolving environment that this study provides a comprehensive understanding of the PD A1 landscape by examining existing tools (particularly digital portals and applications), procedural steps from application to issuance, assessment criteria and anti-fraud verification mechanisms. This study identifies common practices, prevailing trends, significant divergences, associated administrative workloads and practical challenges faced by national authorities. Crucially, the report spotlights successful approaches, good practices and innovative solutions to promote mutual learning, improve cross-border cooperation, facilitate mobility and contribute towards a more harmonised and digitally enabled administration of posting rules throughout the EU and the EEA.

([2]) Decision No A2 of 12 June 2009 concerning the interpretation of Article 12 of Regulation (EC) No 883/2004 of the European Parliament and of the Council on the legislation applicable to posted workers and self-employed workers temporarily working outside the competent State, OJ C 106, 24.4.2010, p. 5, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.C_.2010.106.01.0005.01.ENG;

([3]) Regulation (EU) 2018/1724 of the European Parliament and of the Council of 2 October 2018 establishing a single digital gateway to provide access to information, to procedures and to assistance and problem-solving services and amending Regulation (EU) No 1024/2012 (OJ L 295, 21.11.2018, p. 1, ELI: http://data.europa.eu/eli/reg/2018/1724/oj.

([4]) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on digitalisation in social security coordination: facilitating free movement in the single market, COM(2023) 501 final of 6 September 2023, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52023DC0501.

2.2. Purpose and scope of this study

The central focus of this study is a comprehensive **mapping and analysis of the diverse tools, established processes and specific procedures** employed by Member States and EEA countries in administering and issuing **PD A1** certificates. The study's scope is confined specifically to PD A1 issuance in the context of posting situations, primarily governed by Article 12 of Regulation (EC) No 883/2004, which coordinates social security systems across the EU and the EEA.

To achieve this purpose, the study addresses **three distinct yet interconnected core objectives**.

- **Objective 1: comprehensive inventory of PD A1 digital tools.** The first objective is to compile a comprehensive inventory of the digital applications and online portals currently available or under development in the Member States and EEA countries for requesting and processing PD A1 applications related to posting. This involves not only cataloguing these tools but also analysing their key characteristics, scope (both personal and material, focusing on Article 12) and functionality (e.g. authentication, information provision, user-friendliness features, automation levels, EESSI system interconnection). A key component of this objective is the identification and detailed description of particularly innovative, successful or promising examples that could serve as models or inspire further development elsewhere.
- **Objective 2: analysis of grounds for assessment.** The second objective centres on collecting and analysing data regarding the specific facts, documentation and data elements that Member State and EEA authorities consider when assessing PD A1 applications for posting to determine whether the legal prerequisites are met. This analysis maps the range of elements considered (drawing from the practical guide, Decision A2, Recommendation A1 of the Administrative Commission ([5]) and national practices), the sources of information used and the methods of obtaining this information. The analysis evaluates the extent to which there is divergence and commonality in these practices across the countries concerned and includes an assessment of the associated administrative workload experienced by both applicants (including employers and the self-employed) and issuing institutions.
- **Objective 3: review of control and verification mechanisms.** The third objective is to provide a detailed overview and analysis of the control, verification and anti-fraud mechanisms implemented by Member States and EEA countries in the context of PD A1 issuance for posting. This includes analysing mechanisms applied both prior to issuance (*ex ante* controls) and after issuance (*ex post* controls, whether routine or triggered by specific events like PD A1 contestations). The analysis focuses on assessing the perceived effectiveness of these mechanisms in ensuring the accuracy and legitimacy of PD A1 applications and postings, identifying any reported challenges and highlighting potential good practices in verification and fraud prevention.

To achieve these objectives, the study is structured as follows:

- **Chapter 3** provides a detailed description of the methodological approach and data collection activities undertaken;
- **Chapter 4** presents an overview of the PD A1 portal inventories;
- **Chapter 5** comprises the grounds for assessment analysis and assessment of administrative workload;
- **Chapter 6** contains the analysis of checks and anti-fraud measures;
- **Chapter 7** concludes the study with a discussion of the key findings, challenges faced and suggestions for improvements.

([5]) Recommendation No A1 of 18 October 2017 concerning the issuance of the attestation referred to in Article 19(2) of Regulation (EC) No 987/2009 of the European Parliament and of the Council, OJ C 183, 29.5.2018, p. 5, https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32018H0529(01).

3. Methodology and data collection activities

This chapter outlines the methodological approach and data collection activities employed to fulfil the objectives of the study. The analysis presented in this report is based on extensive data collected from 28 EU and EEA countries ([6]), covering 32 institutions responsible for issuing PD A1 certificates in posting situations under Article 12 of **Regulation (EC) No 883/2004.**

The following sections provide details of the specific data collection tools used (Section 3.1), the structure and content of the PD A1 portal inventory (Section 3.2) and the process of conducting consultations with Member States and national institutions (Section 3.3). Finally, the chapter concludes with a discussion of the limitations and challenges encountered when collecting and analysing the data for this study (Section 3.4).

3.1. Data collection tools: questionnaire, interviews and desk research

The data collection strategy used three complementary tools to ensure sufficiently thorough and reliable information could be gathered across the 28 countries (and 32 national institutions) that are covered by this study ([7]).

3.1.1. Questionnaires

The primary data collection instrument used for this study was a **structured questionnaire** designed to systematically gather detailed information on national practices concerning PD A1 issuance, assessment procedures and control mechanisms. Concretely, the questionnaire comprised **five main sections**: (1) general information about the institution and national context; (2) digital tools used for applications for, issuance of and delivery of PD A1 certificates; (3) grounds for assessment; (4) verification mechanisms and anti-fraud measures; and (5) the perceived administrative workload and any additional observations.

The questionnaire combined **closed questions,** to facilitate the quantification of certain aspects across the institutions concerned, with **open questions**, to capture qualitative insights and country-specific details. Section 3 of the questionnaire, which focused on the **grounds for assessment**, used a tabular format with comprehensive lists of data elements relevant to both employed persons (Article 12(1)) and self-employed persons (Article 12(2)). The questionnaires were distributed to the relevant authorities in each country by a team of national experts, who provided guidance on completing the work and were available to answer questions.

3.1.2. Interviews

After the completed questionnaires had been received, **interviews** were conducted between representatives from the relevant authorities and the national expert. These interviews served **several purposes**: to clarify and expand upon the responses given in the questionnaires, to explore the practical implementation of procedures in greater depth, to understand the rationale behind specific institutional choices and to gather **qualitative insights** on the effectiveness of different approaches and practices concerning PD A1 issuance.

3.1.3. Desk research

Prior to distributing the questionnaire, the project team conducted **desk research** to **pre-populate elements of the PD A1 portal inventory** and contextualise the subsequent data collection activities (i.e. the questionnaires and interviews) more effectively. To this end, the research drew on **several existing sources**, including the 2025 report *National cross-border digital tools and services in the field of EU social security coordination* ([8]) conducted for the ELA, a comparative study on

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([6]) These include all EU and EEA countries, except Malta and Romania, which did not participate through their national institutions.

([7]) For Germany, data were gathered from three distinct institutions: Arbeitsgemeneinschaft berufsstandischer Versogungseinrichtungen (ABV), Deutsche Rentenversicherung (DRV) and Gesetzliche Krankenversicherung (GKV). It should be noted that data for GKV were collected through consultation with a representative of the Allgemeine Ortskrankenkasse. It should also be noted that the applications run on the same portal (SV-Meldeportal).

([8]) ELA, *National cross-border digital tools and services in the field of EU social security coordination*, Publications Office of the European Union, Luxembourg, 2025, https://www.ela.europa.eu/en/publications/national-cross-border-digital-tools-and-services-field-eu-social-security-coordination.

social security coordination and labour law frameworks conducted by the MoveS network for the Directorate-General for Employment, Social Affairs and Inclusion, among other sources.

This preliminary desk research enabled the project team to identify the **basic features of online portals**, such as the hosting institutions, uniform resource locators (URLs) and authentication methods, and to prepare more specific questions for the eventual consultation phase. Additionally, during the analysis phase, the project team incorporated relevant policy documents, legal guidance and statistical reports into the desk research to provide a **broader context** for the key findings identified by the main study.

Taken together, the combination of the data collection tools described above ensured a thorough and comprehensive collection of the necessary information.

3.2. Structure and content of the inventory

A core component of the data collection for **Objective 1** of this study involved developing and populating a comprehensive inventory documenting the digital applications and online portals used for PD A1 applications and issuance across the EU and the EEA. More specifically, the **inventory template** was designed to **capture the key functionalities and characteristics** of these tools in a highly structured, comparable format.

In turn, information on the following elements was gathered for each national institution's online portal or digital tool:

- **name and brief general description of the portal/tool**, including its context and location (e.g. ministry website, employer portal) and **hosting institution**;
- **URL** or access path (if publicly available);
- **authentication** methods (e.g. national e-ID, business registration);
- **personal scope** – who can use the tool (e.g. employers, self-employed, segment-specific);
- **material scope** – whether the tool is used only for posting under Article 12 or also for other types of applicable legislation decisions;
- method of **provision of information** and evidence, including whether submission and signature are fully online;
- **form of acknowledgement of receipt** – how and when the applicant is informed that the request was received;
- **mechanism of issuance and delivery** – how and to whom the PD A1 certificate or its rejection is delivered;
- notification of changes during the posting period and subsequent **issuance of amended documents**;
- **user-friendliness features** such as bulk requests, prefilled data, reuse of previous data and automatic upload from registers;
- **anti-forgery measures** such as QR codes and document protection;
- level of **automation or robotisation** of processing (including which posting prerequisites are handled algorithmically);
- **proportion of PD A1 certificates issued automatically** versus with human intervention (if applicable);
- **other innovative elements** present in the portal/tool;
- **time limits** or deadlines for issuing PD A1 certificates and the average processing time;
- **interconnection with the EESSI** system and how issuance is linked to the automatic triggering of the LA_BUC_04 notification;
- tool for **verification of authenticity of issued PD A1 certificates** (e.g. QR code, separate verification webform);
- **available statistics** – data that show the impact of the tool (e.g. speed, efficiency improvements).

The inventory template was structured to closely align with Section 2 of the questionnaire, enabling the team of national experts to populate it easily based on the consultation outcomes. Following their interviews with the relevant national institutions, national experts completed individual country inventories, integrating information from the questionnaire responses and interview discussions.

The resulting set of inventories provided a comprehensive, standardised dataset documenting the state of digitalisation in PD A1 issuance across the EU and the EEA. This formed the empirical basis for the comparative analysis presented in Chapter 4.

3.3. Methodology of assessing administrative workload

To enable comparisons across countries, Section 5.2 of this study utilises a quantitative administrative workload score. Raw questionnaire responses are converted into numerical values and normalised using a min-max method to a scale of 0–1 (higher values indicate a greater workload). For each country, normalised criterion scores are calculated using weighted averages, separate for applicants and institutions, to produce two composite scores. Weights are then applied to questions to reflect their complexity and the breadth of information required to answer them.

3.4. Limitations and challenges in data completeness or comparability

Survey-based methods, while invaluable for capturing the diverse perspectives of the national institutions, inherently carry limitations that can distort comparisons. One is that much of the evidence is self-reported rather than observed. Reported processing times, automation levels or verification practices reflect institutional perceptions and definitions, which can diverge from measured reality. Another limitation to note concerns the heterogeneity of administrative contexts to which the legal guidelines must be adapted. Institutions operate under different statutory deadlines, case mixes and system configurations. For instance, indicators that look commensurate (e.g. average processing time or degree of automation) may not be comparable as they may in fact reflect different underlying measurement conventions and reporting practices.

A further limitation concerns representativeness. To ensure coverage, the project team consulted national institutions that together account for at least 60 % of each country's PD A1 issuance volume (e.g. in Germany this required consulting with three institutions in order to meet the threshold). While this strategy captures the majority of cases, it does not necessarily represent all institutions or PD A1 certificates issued. As a result, the findings should be interpreted as reflective of dominant practices among high-volume issuers rather than a full census of national practices.

Finally, quantifying administrative workload with survey-based evidence is inherently complex since the collected data is filtered through institutions' willingness and ability to answer. Open-ended questions, especially those that try to identify institutional issues, bottlenecks or cases, are particularly sensitive to this dynamic. As a result, institutions that are reluctant to disclose their challenges or setbacks (whether due to reputational concerns or simply survey fatigue) may choose to provide shorter, less specific answers. Paradoxically, this can make them appear more streamlined: fewer stated problems can be misinterpreted as fewer actual problems. Conversely, institutions that respond diligently and provide more context-rich evidence can appear to have a greater administrative workload. In effect, transparency is penalised, while selective non-response can result in a better score by comparison.

4. Overview of PD A1 portal inventories

Key findings in this chapter

- Application procedure: the online submission of Article 12 PD A1 applications is now the norm, with most institutions operating an online portal, covering the large majority of certificates. Access is commonly available for employers and self-employed workers and, to a lesser extent, to third-party representatives and employees. Authentication relies on strong credentials in most cases, such as national e-IDs, portal credentials, bank IDs and business and tax-ID checks, with foreign authentication possible in a few cases as well. Application occurs fully online in most situations, with residual steps usually concerning submission of additional information, a signature and mandate/identity verification. Automatic and fast acknowledgements are now standard, with issuance decisions delivered electronically by default in most cases. Channels to report changes tend to occur through in-portal updates, cancellation and re-submission, and message-based routes. Furthermore, common user-friendly features include prefilled forms, integrated help functions and chatbots, multilingual support, real-time application status tracking and bulk requests.
- Application processing: effective processing times range from near-instant issuance to several weeks. Additionally, around half of institutions report moderate to high levels of automation. Faster systems tend to employ the following features: strong sign-in features, reuse and prefilling of already available data, legal rules engines mirroring administrative requirements, plausibility checks, dynamic forms and overlap detection. Where only a few of these features are used, application processing is mostly manual, with timelines tending to be longer as a result.
- Verification and anti-forgery tools: interconnection with the EESSI system, with the automated triggering of the notification of posting to the receiving state (LA_BUC_04), is used by a relevant number of Member State institutions. In several cases, there is a direct portal–EESSI interconnection. In others, there is no formal portal–EESSI interconnection, but internal systems trigger the posting notification (LA_BUC_04) in the EESSI system when an issuance decision is taken. When it comes to anti-forgery tools, a few institutions equip the issued PD A1 certificates with QR codes or code-based webforms, which then enable rapid verification by the relevant authorities in the receiving countries.

This chapter investigates the extent to which Member State institutions **have digitalised PD A1 issuance procedures for Article 12 postings**, from the front-end application interfaces to the back-end processing systems and the mechanisms supporting cross-border verification. The analysis draws on the institution-level responses provided by national institutions and the resulting inventory of PD A1 portals across the EU and the EEA.

Concretely, the chapter examines the following three subdimensions and their related practices:

(1) **access and authentication:** portal availability, personal and material scopes, the means of authentication used, the typical application steps and whether the process occurs fully online;

(2) **application processing:** the legal/procedural and effective processing times, the reported level of automation and the share of fully automated procedures; and

(3) **verification and anti-fraud instruments:** whether issuance is interconnected with the EESSI system and which tools are used to certify the authenticity of issued documents.

The quantification of these findings is then performed by **calculating the proportion of institutions employing selected practices** and, where appropriate, **computing the share of Article 12 PD A1 certificates** potentially benefitting from them, based on total issuance in the 28 Member States and EEA countries covered by the study. This approach maps the institutional approaches taken and indicates their impact on application volumes.

4.1. Digitalisation of the application procedures

This section assesses how institutions have digitalised the front-end application process, from portal availability, scope and authentication to issuance decisions and user-friendly features.

Specifically, the analysis examines and quantifies practices across three dimensions:

(a) **access to portal and its authentication methods** (i.e. the presence of an online portal, its material and personal scope, the means of authentication, application steps, the presence of a fully online process and eventual offline steps);

(b) **acknowledgement of the receipt, delivery of the issuance decisions** and **notification of changes** (i.e. the methods by which the application receipt is acknowledged, the final document is issued and eventual changes during the posting periods are communicated); and

(c) **user-friendly features facilitating the application procedures** (i.e. the presence of features such as the prefilling of application forms, help functions, multilingual support and bulk requests).

4.1.1. Access to and authentication methods for portals

Most national institutions (88 %) **operate an online portal** to process online applications for Article 12 PD A1 certificates, covering 98 % of PD A1 certificates issued. Only four national institutions (Cyprus, Greece, Iceland and Liechtenstein) do not report using a portal. In these cases, applications are handled **via email, post or other non-portal channels**. In most of these cases (Cyprus, Iceland and Liechtenstein), applications can be downloaded online and then sent by email. Roughly half of the online portals ([9]) are part of **wider national social security platforms** (57 %), while the rest are stand-alone tools (43 %).

In terms of the **material scope of the portals themselves** (i.e. what specific typologies of PD A1 certificates can be applied for), almost all of them have a broader scope than that defined in Article 12. Moreover, 81 % of portals process Article 12, 13 and 16 applications, 15 % cover Article 12 and 13 applications only and one (4 %) covers applications under Article 12 only.

Concerning the **personal scope** (i.e. who can sign in to the portal to access and/or submit the application), the following individuals are permitted access to the portal and submission.

- **Employers (Article 12(1))** can access and submit PD A1 applications in 89 % (25 of 28) of portals. Concerning the remaining portals, two are for self-employed persons only (and, in one case, also authorised representatives), while one is available to both employees and the self-employed.
- **Self-employed persons (Article 12(2))** can access and submit PD A1 applications in 86 % (24 of 28) of portals. The remaining portals are available to employers or authorised representatives only.
- **Other individuals** can submit PD A1 applications in 48 % of cases. Generally, these are authorised representatives, such as social secretariats (in Belgium for the Rijksdienst voor Sociale Zekerheid (RSZ)) or people with power of attorney (as is the case in Czechia and Norway).
- **Employees (Article 12(1))** can submit PD A1 applications in 11 % of portals. In some cases, employees must provide consent or sign the relevant document, but, generally, they do not play an active role in the application process.

In terms of the **authentication methods for the online portals, Member State institutions** employ different approaches:

- **a national e-ID** is used in 75 % of portals and covers 43 % of PD A1 certificates issued;
- **a username/password (portal-specific)** is used in 36 % of portals but is available across 76 % of PD A1 certificates issued;
- **bank-ID systems** are used in 32 % of portals but are available only to 14 % of PD A1 certificates issued;
- **business registration / tax-ID checks** are used in 25 % of portals, covering 58 % of PD A1 certificates;
- **other tools are** used in 39 % of the cases, covering 63 % of PD A1 certificates. These include **federated state gateways** (e.g. Common Services for Access Management with Electronic Identification, Authentication and Trust Services (eIDAS) in Belgium), **high-assurance credentials** (e.g. PIC + QES in Bulgaria, Cl@ve in Spain, ELSTER certificate / Bund ID in Germany) and foreign-users authenticators (Finnish Authenticator in Finland and EU e-IDs in Belgium, Germany and Estonia).

([9]) For Section 4.1, further quantifications over the total number of portals are performed without considering the Member State institutions not running a portal, i.e. Cyprus, Greece, Iceland and Liechtenstein. However, quantifications over the total number of PD A1 certificates issued for posting reasons include the four countries not running a portal.

In most situations, the **application process for Article 12 PD A1 certificates occurs entirely online**. This is the case for 79 % of institutions, with a fully online process available for 89 % of certificates. Where **offline steps** still occur, these typically relate to the **submission of additional documentation or information by the applicant, a manual signature on the application or mandate/identity verification**. The reported descriptions of the application steps typically occur in the following sequence: (a) **registration** (if necessary); (b) **authentication**; (c) **form completion**; (d) **uploading of evidence**; and (e) **submission**. In case there are deviations from this order, they mainly relate to mandate proofs or the provision of additional documentation.

Box 1: Foreign authentication process for national PD A1 portals

Foreign authentication is not consistently available across the surveyed institutions. A typical reported obstacle for foreign employers is related to the need for domestic registration in the country where the application is made, as is the case in Estonia, France, Croatia, Italy, Austria, Portugal and Slovenia.

Across a few Member States, the submission of applications by foreign establishments is made possible in the following ways.

- EU e-ID (e.g. eIDAS) is accepted in Belgium, Czechia, Germany and Estonia. However, in Belgium (RSZ) and Estonia, this is conditional upon the employer being registered domestically. Furthermore, Estonia indicates that constraints should ease with the implementation of the Single Digital Gateway Regulation.
- Foreign authenticator. Finland provides the Finnish Authenticator, enabling a representative of a foreign employer to submit a PD A1 application. The employee must, however, have a Finnish personal identity number.
- Authentication through a third-party representative is possible in Bulgaria, Spain and Slovakia.

4.1.2. Acknowledgement of the receipt and delivery method of the issuance decision and of the document

A clear majority of institutions (93 %, covering 98 % of PD A1 certificates) report an **automatic acknowledgement generated by the portal** following submission. Other methods of acknowledging receipt of an application include **automated email notifications** (used by 32 % of institutions and 15 % of certificates), secure email messages (7 % of institutions and 6 % of certificates), standard email messages (7 % of institutions and 14 % of certificates) and other means (7 % of institutions and 9 % of certificates). Generally, the acknowledgement of receipt confirms that the application has been submitted. Additional elements contained in the receipt may include timestamps, unique references or identifiers and basic-service-level information (e.g. an indicative processing window or next steps). In nearly all cases (93 % of portals and 96 % of certificates), **the receipt is provided instantly or within a few hours**.

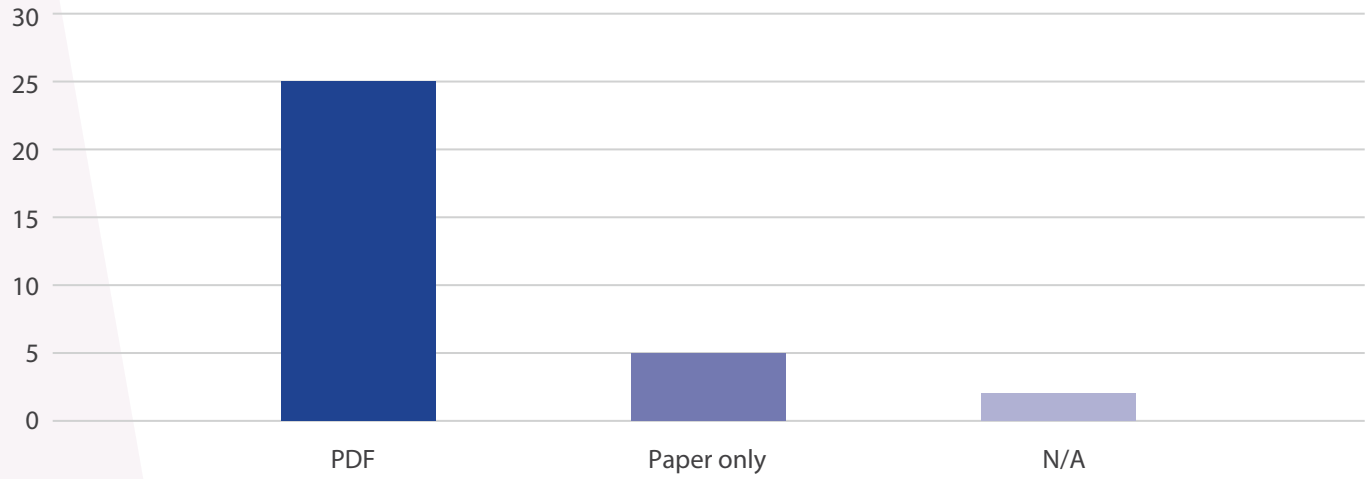
When a final decision is made, this can be sent through the following means.

- **Electronically via the application portal.** This is the most common method, used by 75 % of institutions, available for 95 % of PD A1 certificates issued.
- **By post.** This method is employed by 43 % of institutions that run an online portal, available for 17 % of PD A1 certificates.
- **Electronically via standard or secure email.** Standard emails are used by 18 % of institutions (covering 8 % of certificates), while secure ones are used in 11 % of cases (covering 13 % of certificates).

The **document format** is generally a **PDF**, which may carry protective features, such as QR codes (e.g. in France) or a webform (e.g. in Norway) ([10]). In several systems, **issuing the PD A1 certificate electronically also triggers or is aligned with cross-border steps, i.e. the triggering of an EESSI system notification** (see Section 4.3.2). In addition, the results also indicate that **paper delivery** persists as a **fallback** for specific cohorts or where a paper original is required (see Box 2).

([10]) QR verification allows inspectors to scan a two-dimensional code that opens a web page certifying the authenticity of the document. Webform-based verification requires the inspector to manually type an alphanumeric code into a web page.

Figure 1: Institutions that issue the PD A1 document electronically versus those that do not



Source: Author's own elaboration based on interview and survey data.
NB: Cyprus, Greece, Iceland and Liechtenstein are included in the count. Sozialversicherungsanstalt der Selbständigen (SVS) of Austria reported that PDFs are used only exceptionally. For this reason, they are not included in the count of PDFs.

Box 2: Electronic first, paper as a fallback

Several institutions prioritise the electronic application and delivery of PD A1 issuance decisions while maintaining paper or postal dispatch where necessary. In this respect, the Single Digital Gateway Regulation allows Member States to complete relevant online procedures also through offline channels ([11]).

Institutions offering paper-based applications and issuance include the following.

- Lithuania (Valstybinio socialinio draudimo fondo valdyba (SODRA)). The PDF of the PD A1 certificate is available on the SODRA portal, although paper copies can still be obtained if the applicant requests them.
- The Netherlands (Sociale Verzekeringsbank (SVB)). Applicants can submit the application online through mySVB using the Dutch online authentication tool (DigiD), which leads to the issuance of a PD A1 certificate in PDF format. Foreign employers can apply following a paper procedure.
- Norway (Arbeids- og velferdsetaten). The application can either be submitted through the institution's portal or the Altinn portal, or by filling in a paper form and sending it by post. Similarly, the issued document can be either in PDF or in paper format.
- Sweden (Försäkringskassan). The PD A1 issuance decision is communicated via a digital postbox, but the document can be provided in paper format as well.

The **applicant (either the employer or the self-employed worker)** is the main recipient of the final decision, mentioned by 64 % of institutions running portals. Other recipients include third-party representatives (54 % of institutions) and the employees (25 % of the cases). The document is also sent to the employer and the employee together by 29 % of institutions.

When **notification of changes during the posting period occurs**, institutions typically provide a channel for reporting changes through the portal or designated email. Accordingly, there are three main ways in which these changes can occur.

- **Direct changes in the portal.** These allow applicants to notify the institution of their changes directly in the portal. This is the case, for example, in Poland, Portugal and Finland. In certain situations, the application might need to be resubmitted.
- **Resubmission of the application.** In some cases, applicants need to cancel their application and submit a new one. This is the case, for example, in Belgium, Germany and Lithuania.
- **Message-based routes.** In these situations, applicants notify institutions through secure state channels rather than through a portal, such as in Czechia (using its data box or secure email), Denmark (with secure email), Italy (with

([11]) Article 6(5) of Regulation (EU) 2018/1724.

certified email or through *cassetto bidirezionale)* and Hungary (through the Ügyfélkapu portal). In only a few cases, namely in Norway and Sweden, notification can occur by phone, standard email or post.

In most cases, **changes to posting conditions result in a new PD A1 certificate being issued** for 79 % of institutions. In some cases, this is accompanied by notification to the receiving Member State, as reported by Italy, Latvia and Lithuania. In other situations (reported by 14 % of institutions), the result of **changes leads to the issuance of an amended PD A1 certificate**. Furthermore, **no additional document is issued in very limited cases** (mentioned by 4 % of institutions).

4.1.3. User-friendly features

Member States' portals provide a variety of user-friendly features that facilitate PD A1 applications. These features include the following.

- **Prefilled forms with already-available applicant data.** This is the most widespread type of facilitation, available across 71 % of the portals, covering 91 % of PD A1 certificates issued. Prefilling forms aims to reduce the workload of applicants by avoiding the re-submission of already available information. In some situations, online tools allow users to reuse data from previous applications. This is the case, for instance, for Belgium (RSZ), Germany (DRV) and Finland. For example, the DRV offers an online storage facility allowing users to prefill the application with employee and company data stored after their first registration. In other situations, prefilled data are automatically retrieved from national registers, as the point that follows illustrates.
- **Automatic retrieval from national registers.** In these situations, institutions' internal systems upload data from other national databases. Data retrieved include identity or address information from population registers, company data from business or tax registers and affiliation or employment history from social security records. This method is used by 39 % of institutions, which cover 21 % of PD A1 certificates, as is the case for Bulgaria, Lithuania, Norway and Spain.
- **Integrated help functions or chatbots.** This is another common feature, used by 54 % of portals and available for 72 % of PD A1 certificates. Its aim is to facilitate users' filling of data, addressing potential questions that might arise. In this respect, common functionalities include tooltips, explanatory information, filling assistance and chatbots helping the applicants in case of questions.
- **Multilingual support.** Although 44 % of portals use this feature, it only covers 9 % of PD A1 certificates. Multilingual functions facilitate applications for employers located abroad. Notable examples of institutions using multilingual support include Belgium (Sociale Zekerheid Zelfstandige Ondernemers (RSVZ) and RSZ), Luxembourg, the Netherlands and Sweden.
- **Real-time application status tracking.** This tool is reported by 29 % of portals, accounting for 17 % of PD A1 certificates. These tools allow the applicant to keep track of the application steps and of any further action required. More specifically, national institutions that use application tracking instruments include those in Ireland and Finland. Applicants can use these instruments to check the status of their application, find out if it is being handled by an employee and see if additional documents are required.
- **Bulk requests.** 16 % of institutions allow applicants to submit multiple applications at the same time, accounting for 16 % of PD A1 certificates. Bulk requests help to reduce the workload on applicants by enabling them to submit multiple applications at once. Moreover, national institutions that employ bulk requests include those in France, Croatia, Luxembourg and the Netherlands. Bulk requests are widely used in Croatia and the Netherlands, as reported by the consulted institutions.
- **Other tools.** Only a few institutions report the use of other user-friendly tools. These include the presence of **QR codes to verify the authenticity of documents** (France, Croatia and Slovenia), **quality control checks** (Luxembourg) and **help indicators** (Poland).

Table 1: User-friendly features by Member State institution

Institution	Bulk requests	Prefilling of forms	Automatic data upload from national registers	QR code to verify authenticity	Real-time application status tracking	Multilingual interface support	Integrated help functions / chatbots	Total number of features
AT (ÖGK)	×	×	×	×	✓	✓	✓	3
AT (SVS)	×	×	×	×	×	×	×	0
BE (RSVZ)	×	✓	✓	×	×	✓	×	3
BE (RSZ)	×	✓	✓	×	Y	✓	✓	5
BG	×	✓	✓	×	×	✓	×	3
CZ	×	✓	✓	×	✓	✓	✓	5
DE (ABV)	×	✓	×	×	×	×	✓	2
DE (GKV)	×	✓	×	×	×	×	✓	2
DE (DRV)	×	✓	×	×	×	×	✓	2
DK	×	×	×	×	×	✓	×	1
EE	×	✓	✓	×	✓	✓	×	4
ES	×	✓	✓	×	×	×	×	2
FI	✓	✓	✓	×	✓	✓	✓	6
FR	✓	✓	✓	✓	✓	×	×	5
HR	✓	✓	×	✓	×	×	✓	4
HU	×	×	×	×	×	×	×	0
IE	×	✓	×	×	✓	×	×	2
IT	×	✓	×	×	×	×	×	1
LT	✓	✓	✓	×	×	×	✓	4
LU	✓	×	×	×	×	✓	×	2
LV	×	×	×	×	×	×	×	0
NL	✓	✓	×	×	×	✓	✓	4
NO	×	×	×	×	×	×	×	0
PL	×	✓	×	×	×	×	✓	2
PT	✓	×	×	×	✓	×	✓	3
SE	×	✓	×	×	×	✓	✓	3
SI	✓	✓	✓	✓	✓	×	✓	6
SK	×	✓	✓	×	×	✓	✓	4

Legend	0	1 to 2	3 to 4	> 5

Source: Milieu's calculation based on the questionnaires received from national institutions.

4.2. Digitalisation of application processing

This section shifts the focus from the front end of the application to examine what happens after submission, specifically how institutions process PD A1 applications and how quickly they reach a decision.

The analysis is based on two core dimensions: **processing speed and the reported level of automation**. The section starts by providing an **overview of the legal and procedural deadlines**, along with the **actual processing times**, categorising institutions into groups. It then examines the **level of automation** experienced by institutions in practice, looking at the types of rule-based controls used and, where available, the percentage of documents issued through fully automated procedures. Finally, the section aims to identify which automation approaches tend to result in shorter processing times.

4.2.1. Processing times (formal and effective times)

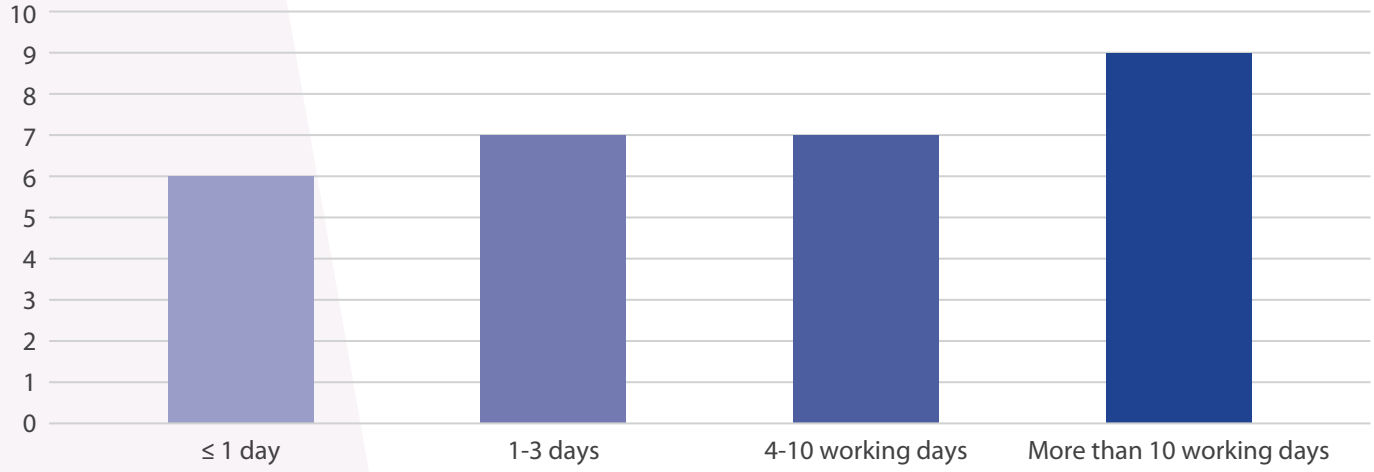
Nearly **two thirds of institutions** (63 %, covering 88 % of PD A1 certificates) need to respect a **formal time limit** when issuing a decision ([12]). These limits are generally set via procedural rules or are enshrined in administrative law and vary a lot across institutions. For instance, in Germany, institutions issuing PD A1 certificates have three days to take a decision once it has been established that German social security legislation applies. Moreover, in Slovenia, the PD A1 certificate must be issued within five days, while in Hungary, accelerated procedures (called summary procedures in Hungarian law) need to respect an eight-day limit, though standard ones can be completed within 60 days. In Lithuania, the limit is 20 days and in Slovakia it is 45 days. In general, the time limit is 30 days and is established by administrative law in various countries, with an upper limit of 60 days for complex cases. This is the case in Czechia, Estonia, Italy, Latvia, Poland and Portugal. In the Netherlands, the limit set by the code of administrative procedure is eight weeks. A few institutions rely on non-binding targets, like in Belgium (RSVZ), where there is a seven-day limit, or in Italy, where the institution's (Istituto Nazionale della Previdenza Sociale) website estimates seven days for the conclusion of the procedure.

In terms of **effective processing times**, there is **strong variation** across institutions observed. Concretely, the reported averages can be sorted into the following four clusters (and are visualised by Figure 2).

- **Same day (within 24 hours).** Institutions reporting rapid processing times include Österreichische **Gesundheitskasse (**ÖGK) **in Austria** (approximately one hour), **Finland** (up to one hour via its automated procedure), **Germany DRV** (immediate when processed via automated procedure), **France** (less than one day), **Belgium RSZ** (from 12 to 24 hours if no issues arise) and **Slovenia** (two thirds of applications processed within one day).
- **1–3 days.** A decision is rendered in no more than two or three days in **Belgium (RSVZ)**, **Germany (ABV and GKV)**, **Spain**, **Croatia**, **Luxembourg** and **the Netherlands** (if no issues are raised).
- **4–10 working days.** Longer timelines are reported by national institutions where the application process is moderately automated or not automated at all (see Section 4.2.2 for further details). These cases include **Iceland** (three to five working days), **Italy** (five days in audit samples), **Estonia** (five calendar days), **Austria (SVS)** (5 to 10 working days) and **Poland** (where the process takes less than seven days when it is uncontested).
- **More than 10 working days (2–4 weeks or longer).** Timelines of 2–3 weeks are reported by **Czechia**, **Denmark**, **Lithuania**, **Hungary** and **Portugal**. Additionally, **Ireland** indicates a four-week process for online cases (increasing to eight weeks for offline applications). The longest timelines are reported by **Bulgaria** (one month) ([13]), **Sweden** (31 working days), **Poland** (up to 60 days for complex cases) and finally, **Norway** (130 days).

The **considerable variation observed in processing times can largely be attributed to the differing levels of automation involved in processing applications**. Faster outcomes (within three days) are common when key prerequisites are checked automatically. Institutions that rely heavily on manual verification of prerequisites and data, that have a low level of automation and that have longer formal deadlines tend to have longer processing times. In this respect, Section 4.2.2 explores the level of automation utilised by institutions issuing Article 12 PD A1 certificates.

Figure 2: Institutions by reported processing time



Source: Author's own elaboration based on interview and survey data.

([12]) The analysis for this section includes the Member State institutions that do not have a portal running PD A1 applications for Article 12, i.e. Cyprus, Greece, Iceland and Liechtenstein.

([13]) In Bulgaria, the PD A1 certificate can be issued earlier than one month, depending on the case.

4.2.2. Perceived level of automation of PD A1 issuance procedures

There are **strong variations in the reported levels of automation and robotisation across institutions issuing Article 12 PD A1 certificates**. The following clusters of national institutions are sorted according to the reported levels of automation, allocated across four different bands (see Table 2 for quantifications).

- The first group reports **high automation**, whereby standard or low-risk cases are decided with minimal human intervention, thanks to features like automated cross-checks with other registers, logic checks and automatic checks of company declarations and data. In these situations, manual handling occurs when anomalies are flagged. Countries in this group include **Belgium (RSZ, RSVZ)**, **Germany (DRV)**, **France**, **Austria (ÖGK)**, **Slovakia and Finland**.
- The second group reports **moderate automation**. In these situations, human intervention is required, for instance, to verify information with internal registers and with databases of other institutions, or to check specific conditions (e.g. the validity of employment contracts). Countries in this group include **Denmark**, **Germany (ABV, GKV)**, **Spain** and **Croatia**.
- The third group records **limited automation**, with processes that rely heavily on human intervention and use very few automated procedures. In these cases, automation involves checking the relationship between the employer and employee, the applicant's nationality, the sending country and the previous posting period(s). Examples of countries in this group include **Bulgaria, Ireland, Lithuania, Norway** and **Poland**.
- The fourth and final group reports **no automation at all**, with the processing of applications relying entirely on human intervention. These include **Austria (SVS), Czechia, Hungary, Iceland, Italy** and **Liechtenstein**.

Table 2: Reported levels of automation across national institutions

Extent to which the issuance process is automated/robotised	Institutions covered	% of institutions	% of PD A1 certificates issued
To a high extent (little to no human intervention required)	AT (ÖGK), BE (RSZ), BE (RSVZ), DE (DRV), FI, FR, LU, NL, SK.	**28 %**	**24 %**
To a moderate extent (some human intervention required)	DE (ABV), DE (GKV), DK, ES, HR, PT, SI.	**22** %	**57 %**
To a limited extent (significant human intervention is required, with some automated processes)	BG, IE, LT, NO, PL.	**16** %	**9 %**
Not automated at all	AT (SVS), BG, CZ, EE, EL, HU, IS, IT, LI, LV, SE.	**34** %	**10 %**

Source: Author's own elaboration based on interview and survey data.
NB: Cyprus and Greece did not provide data on the level of automation in processing PD A1 applications, but they are included in the count under the category 'Not automated at all'.

The main automated approaches reported by institutions are **deterministic and rule based**. Rather than employing predictive algorithms, systems implement the legal and administrative prerequisites for issuing Article 12 PD A1 certificates. These mechanisms can be categorised into five **building blocks**, each of which is illustrated with a concrete example provided by the institutions.

- **Robust sign-in and representation checks.** First, portals confirm the identity of the applicant and any individuals they are applying on behalf of. Strong credentials (such as national e-IDs) and mandate checks guarantee that only authorised persons can apply. In **Belgium**, for example, the RSZ issuance process is blocked unless a valid Déclaration Immédiate/Onmiddellijke Aangifte (Dimona) employment declaration is available for the stated period. If this is not the case, the employer must correct the Dimona declaration before reapplying. In **Luxembourg**, the employer–employee link is verified upfront through pre-checks with SECUline, which flags anomalies for manual assessment.
- **Data reuse and prefilling forms from registers.** Once the authentication is done, systems use existing data and query other sources (such as tax or business registers) to prefill fields and validate information. **Belgium (RSVZ)** systematically verifies self-employment affiliation through the help of an automated system that verifies whether an individual is registered as a salaried worker or civil servant. **The Netherlands** checks if an employer has substantial activity and for how long it has been registered in the country by automatically checking staffing data and registration with the Chamber of Commerce. In the event that the check fails, the case is flagged for manual review.
- **Rules engines mirroring laws and administrative requirements.** Deterministic checks incorporate legal conditions (e.g. 24-month posting limit or prior affiliation in the sending state). For instance, **Germany (DRV)** runs a series of

automated logic checks vis-à-vis Article 12 conditions, while **Slovakia** employs a two-stage algorithm, where answers must first meet Article 12 conditions (like the 24-month posting limit) and then align with internal registers. The PD A1 certificate is issued only if these requirements are fulfilled.

- **Plausibility checks.** Some systems embed plausibility checks in online forms. If an entry appears implausible due to date overlaps or missing attachments, for example, the system will prompt the user to provide clarifications or supporting documents before the final submission. **Finland**, for example, uses a dynamic application system that requests clarifications if an entry is inconsistent with previous questions or register checks. In another case, **Germany (GKV)** carries out plausibility and inventory checks on health insurance records. If all the prerequisites cannot be verified, the application is flagged for manual review by the processing department.
- **Overlap detection.** Some systems check for overlaps with existing PD A1 certificates to verify previous postings. France, Norway and Portugal are examples of this. Croatia and Portugal, for example, also enforce interval rules, ensuring that there is a two-month interval between postings to the same countries and undertakings.

Taken together, these approaches show that **automation in the processing of Article 12 PD A1 certificates is rule based rather than predictive**. Simple cases are processed quickly by automatically checking administrative and legal conditions, while exceptions are flagged for human review. This approach aims to improve speed and consistency without compromising human control.

Only a few institutions issue a high percentage (above 50 %) of PD A1 certificates automatically. However, a clear pattern emerges: the more building blocks that are in place, the higher the reported share of fully automated certificates issued. Relevant examples include **Austria (ÖGK)** (with 98 % of certificates fully automated), **Luxembourg** (98 %), **France** (90 %), **Belgium (RSZ)** (80.1 %), **Germany (DRV)** (80 %) and **Finland** (68.7 %). By contrast, where one or more building blocks are missing, generally due to limited interoperability with registers and strong reliance on case-by-case judgements, institutions report little to no automation.

4.3. Verification and anti-forgery instruments

A key dimension of digitalisation concerns how **issuance decisions can be verified with cross-border exchange and how institutions certify the authenticity of issued PD A1 certificates**. Against this backdrop, this section reviews the interconnection of the issuance process with the EESSI system and the anti-forgery tools used to certify authenticity, based on the information provided by institutions during the consultation phase of this study.

4.3.1. Interconnection with the electronic exchange of social security information system

While interconnection with the EESSI system alone does not, by itself, ensure verification, it represents a key step. Indeed, timely LA_BUC_04 notifications can be used once the receiving state registers them in its database and grants inspectorate access.

In this regard, **half of the institutions (covering 48 % of certificates) report automated interconnection with the EESSI system**, meaning that a PD A1 issuance decision automatically triggers a posting notification (LA_BUC_04) to the institutions in the receiving state. Specifically, three different approaches can be identified.

- **Direct interconnection between the portal and the EESSI system.** In these situations, the issuing tool is directly linked to the EESSI system. Once a decision is made, the LA_BUC_04 notification is dispatched via SED A009 (a structured electronic document for notification of posting). Examples of national institutions that use this approach include Austria (ÖGK), France, Italy and Norway.
- **No formal interconnection but internal systems notify the EESSI system.** In these cases, the tool is not formally connected to the EESSI system, but internal systems automatically dispatch a LA_BUC_04 notification to foreign institutions when a decision is taken. This is the approach used, for example, by Denmark, Germany (DRV) and the Netherlands.
- **No interconnection.** Some systems do not have automated interconnection with the EESSI system. In some institutions, interconnection with the system is planned in the future. This is the case, for example, for Czechia (where automation started in December 2025), Lithuania and Poland.

Table 3: EESSI system interconnection across Member State institutions

Type of interconnection	Institutions covered	% of institutions	% of PD A1 certificates issued
Direct interconnection between the portal and the EESSI system	AT (ÖGK), BE (RSVZ), BE (RSZ), ES, FI, FR, HR, IT, LU, NO, PL, PT, SI.	41 %	40 %
No interconnection of the tool, but decision triggers dispatch	DE (DRV), DK, NL.	9 %	8 %
No interconnection	AT (SVS), BG, CZ, DE (ABV), DE (GKV), EE, HU, IE, IS, LI, LT, LV, SE, SK.	44 %	52 %
No answer	CY, EL.	6 %	0.03 %

Source: Author's own elaboration based on interview and survey data.

4.3.2. Advanced tools to certify the authenticity of issued PD A1 certificates

Meanwhile, a few institutions (19 % of issuers, covering 25 % of certificates) are equipping PD A1 certificates with anti-forgery tools. These enable the relevant authorities in the receiving countries to check whether they are valid and authentic. The following two approaches can be identified from this.

- **QR codes.** Some systems place a QR code on the issued PD A1 that can be scanned by the authorities located in the receiving countries to check the validity of the document. Institutions that report using this tool include France, Croatia and Slovenia.
- **Alphanumeric codes / webforms.** In other situations, the issued documents carry a code or webform that authorities in the receiving countries can embed within an ad hoc website to check the authenticity of the document. This is the approach used, for example, by Poland, Portugal and Slovenia.

It is also the case that **QR codes and webforms can be used jointly**. In Slovenia, for example, verification can be performed in two ways. The first method involves inserting the certificate and personal identification number into a web application ([14]). Alternatively, if the certificate carries a QR code, this can be scanned with a mobile phone to show the relevant information carried by the document.

Table 4: Types of verification used by national institutions

Institution	Type of verification
Spain	Alphanumeric code / webform
France	QR code
Croatia	QR code
Poland	Alphanumeric code / webform
Portugal	Alphanumeric code / webform
Slovenia	Alphanumeric code / webform; QR code

Source: Author's own elaboration based on interview and survey data.

4.4. Good practices identified

To identify **good practices** related to PD A1 portals, this section examines **four relevant case studies** that are identified across each of the three different dimensions underpinning the analysis: (1) **digitalisation of the application procedure**; (2) **digitalisation of the application processing**; and (3) **verification and anti-forgery instruments**. The aim of this exercise is to identify national institutions and systems exhibiting advanced approaches across the various features of the three dimensions, as identified in the previous sections of this chapter.

([14]) https://zavarovanec.zzzs.si/e-storitve-zzzs/checking-the-validity-of-an-a1-certificate/.

Each case study follows the same structure. First, a summary of the institution's key strengths is provided. Next, a detailed analysis of the good practice is provided. Finally, the last section assesses the impact of the institution's good practices on key aspects such as user experience and application processing times.

4.4.1. Digitalisation of the application procedure

Box 3: Good practice 1, application procedure

Social Security Office (RSZ), Belgium

Key strengths

- High assurance login and tight register gates. Allows application only by authenticating with strong credentials and by proving that an employer–employee link exists.
- Several user-friendly features. Facilitates the application experience for users using prefilling functions, tooltips and tracking.
- Foreign access possible and multilingual support provided. Allows access to foreign employers registered in Belgium with eIDAS. Offers the portal in Dutch, French and German, plus an English manual (15).

Analysis and rationale

The portal of the **Belgian RSZ** combines strong identification (Common Services for Access Management and eIDAS) with mandate verification and cross-check with other registers before completing the application. Authentication with eIDAS is possible provided that the employer is registered in the country.

The **requirement to provide a correct Dimona** declaration ensures that a valid employer– employee link exists for the declared period. Failure to provide a valid Dimona declaration halts the issuance and instructs the employer to correct the submission.

Multilingual services, prefilling forms from already-held data and from national registers, real-time tracking and tooltips complement the solid upfront checks, facilitating application for cross-border users. Additionally, the possibility to reuse previous applications, adapting them where needed, further improves user experience for applicants.

Impact and outcome

This system combines robust upfront checks with a smooth application process. These two elements aim at making the application experience user-friendly, without sacrificing compliance. The use of data already held by the authority facilitates the fast completion of applications, with uncontested decisions taken in 12–24 hours.

Box 4: Good practice 2, application procedure

Finnish Centre for Pension (Eläketurvakeskus), Finland

Key strengths

- Foreign-user authentication with controlled assurance. Enables authorised representatives of non-Finnish employers to submit the application through the Finnish Authenticator, while preserving robust checks.
- Data reuse and adaptive questioning. Prefills form from registers and dynamically asks clarifying questions if inconsistencies are detected, improving the data quality of submitted applications.
- Tracking tools supporting applications. Provides users with an overview of the application and further action required with real-time status tracking.

(15) https://settlinginbelgium.be/en/do-business/working-abroad.

Analysis and rationale

Finland reduces accessibility barriers for cross-border employers by offering the dedicated **Finnish Authenticator**, while preserving assurance through strong identifiers. Operational since May 2025, the Finnish Authenticator allows representatives of employers without a Finnish personal identity number to submit PD A1 applications.

Once users are authenticated, they can **copy data from previous submissions** to complete the application. Additionally, the system uses **pop-ups** to communicate that the document cannot be issued if the information provided is not consistent with the type of certificate applied for (e.g. if the applicant selects 'indefinite' in the entries connected to the start and end of the posting). Additionally, applicants can check the status of their application in real time (i.e. whether the application is in the queue, being handled or waiting for additional information). Other user-friendly features include the possibility to submit bulk requests and multilingual support.

Impact and outcome

As in Belgium, the system combines inclusive access with robust upfront validation, leading to fast issuing times. Indeed, the majority of applications are decided on in less than an hour, while, for more complex cases, the waiting time is around three weeks.

4.4.2. Digitalisation of application processing

Box 5: Good practice 3, application processing

German Pension Insurance (DRV), Germany

Key strengths

- Sequenced logic checks for compliance. Runs a sequence of logic checks to verify if Article 12 conditions are fulfilled, leading to automated issuance if all conditions are met.
- High automation rates and instant delivery. 80 % of applications are processed digitally, with delivery often occurring instantly in these cases.
- Reduced workload. Reduces workload in the processing department due to automation.

Analysis and rationale

The DRV implements a series of **logic checks mirroring Article 12 conditions** to assess if these are fulfilled. Additionally, the possibility for users to activate **a storage facility** on the SV-Meldeportal to keep their own company and employee data further speeds up the process.

Strong automation is associated with fast application processing. For automated cases (80 **%**), the application is processed instantly while for the remaining ones (20 **%** of the cases), the average processing time is 10 days.

Impact and outcome

The introduction of automated processing has led to faster processing times and reduced the workload for the processing department, despite a tenfold increase in applications. Indeed, the DRV reports that the average processing time for clerks' manual reviews has been reduced from 38.5 days in 2019 to 10 days in 2024.

4.4.3. Verification and anti-forgery instruments

Box 6: Good practice 4, verification and anti-forgery instruments

General Treasury of the Social Security (Tesorería General de la Seguridad Social (TGSS)), Spain

Key strengths

- Automatic triggering of EESSI notifications. Links issuance of PD A1 documents to LA_BUC_04 notifications, promptly dispatching SED A009 (notification of posting) in receiving countries.
- Code-based online authenticity verification. Equips PD A1 certificates with a code that can be entered into the social security e-office to verify authenticity and integrity.

Analysis and rationale

The TGSS **links application decisions to the EESSI system**, ensuring that institutions in receiving countries receive SED A009 notifications in a timely manner.

To certify the authenticity of the issued PD A1, the TGSS equips the document with a code. This is a unique alphanumeric code of 30 characters that certifies that a document issued by the Spanish social security is authentic. The code can be entered into a publicly available webform provided by the Spanish social security to check if the document is authentic ([16]).

Impact and outcome

The automated dispatch of the EESSI notification facilitates interoperability with institutions in receiving countries, reducing mismatch risks. At the same time, the code enables quick verification of the issued documents, reducing the risk of forgeries and contestations.

([16]) https://w6.seg-social.es/ProsaInternetAnonimo/OnlineAccess?ARQ.SPM.ACTION=LOGIN&ARQ.SPM.APPTYPE=SERVICE&ARQ.IDAPP=AFHS0002.

5. Grounds of assessment analysis

Key findings in this chapter

- The analysis reveals key patterns in the implementation of Article 12 posting prerequisites by Member States. There is strong convergence on basic verification requirements: nearly all institutions (97–100 **%**) collect essential geographic and temporal data elements, such as start and end dates, the host country and previous posting periods. This check is almost exclusively carried out *ex ante*. However, substantial divergence in practices among the national institutions emerges in complex assessments, particularly regarding prior affiliation and direct employment relationships. While 83 **%** of institutions verify the location of the company's registered office, the proportion of institutions conducting financial indicator checks varies considerably. For example, turnover verification is conducted by only 53 **%** of institutions, despite affecting 80 **%** of PD A1 certificates, reflecting a concentration among high-volume issuers.
- Information sources reveal a heavy reliance on applicant declarations, though practices vary significantly. For instance, despite 70 % of institutions having the capability, only 38 % of PD A1 certificates benefit from internal register verification of previous posting periods. For self-employed individuals, 77 % of institutions verify the maintenance of an office (94 % of PD A1 certificates), but only 40 % of institutions check registration with professional bodies, despite this covering 90 % of PD A1 certificates.
- The prevalence of administrative workload faced by institutions and applicants varies significantly between the national institutions observed. Applicant scores range from 0.11 in Spain (indicating a low administrative workload) to 0.79 in Latvia (indicating a high administrative workload), averaging 0.34 across the EU and the EEA. Key drivers for applicant workload are information requirements and portal usability features. In terms of the administrative workload faced by institutions, scores range from a low of 0.09 in Luxembourg to a high of 0.90 in Bulgaria, averaging 0.46 in total. Overall, the key drivers of administrative workload for institutions concern the extent of the verification effort required and the prevalence of automated processes used by the institution. Using a comparative matrix to assess all national institutions across both dimensions (applicant- and institution-facing workloads) reveals distinct patterns: some national institutions achieve a low administrative workload through focused checks and automation, while others maintain a high administrative workload through extensive manual verification.
- Common challenges noted by the national institutions include ambiguous legal definitions (particularly 'substantial activity' and 'replacement ban'), limited real-time access to tax and revenue data, lack of database integration, and operational and technical difficulties in detecting false information and distinguishing genuine from false self-employment.

The assessment of PD A1 applications for posting situations under Article 12 is a key point at which EU legal requirements interact with national administrative practices. In order to determine the extent to which there is convergence around certain practices among different national and institutional contexts, this chapter investigates precisely how the EU and EEA national institutions under study implement the posting prerequisites set out in the regulatory framework.

Drawing upon detailed data collected through questionnaires from national institutions in all reporting Member States and EEA countries ([17]), the analyses presented in this chapter provide an **empirical basis for understanding the current assessment practices of the relevant national institutions**. Specifically, this includes mapping **which data elements** are routinely verified, **when these verifications occur** (i.e. *ex ante* or *ex post*) and **how information is obtained** (e.g. manually using internal registers, automatically using external registers). These findings aim to highlight the extent to which certain criteria are assessed and how they compare to others, both within and between institutions, in order to reveal the underlying patterns that characterise PD A1 assessments across Europe.

This examination proceeds through **three complementary steps**. Section 5.1 begins by establishing the **framework for analysing assessment grounds**, outlining the full suite of posting prerequisites and data elements that were investigated by this study. Next, building on this framework, Section 5.2 proceeds by **mapping and quantifying the prevalence of current national assessment practices**, identifying areas of convergence and divergence in how institutions verify posting prerequisites. Finally, Section 5.3 explores the practical implementation of such checks by analysing their **resulting administrative workload** for the national institutions and applicants, looking at different sets of checks in each case.

([17]) These include all 27 Member States except Malta and Romania, which have not participated through their national institutions, and the additional three EEA countries (Iceland, Liechtenstein and Norway).

5.1. Framework for analysing PD A1 assessment grounds

In order to provide a clear and structured basis for the subsequent analysis, this section outlines the methodological framework that is used to **map and analyse the grounds for assessment** for PD A1 issuance. Concretely, this framework is informed by the core legal and interpretative instructions that government posting situations under Article 12 of Regulation (EC) No 883/2004, Decision A2 and Recommendation A1 of the Administrative Commission were developed. This catalogue was then operationalised as the basis for Section 3 of the project questionnaire (see Annex I), which inquired whether national institutions check each specific data element, when they check it (*ex ante* or *ex post*) and from what source they obtain the information, ensuring that the analysis in the following sections is grounded in a consistent, comparative framework. Table 5 provides an overview of such a framework, including the key posting prerequisites and their corresponding data elements that were investigated for both employed and self-employed persons. Accordingly, this table serves as a reference for the detailed mapping and analysis of national practices that follows.

Table 5: Overview of posting prerequisites and data elements investigated, employed (Article 12(1)) and self-employed (Article 12(2)) persons

Grounds of assessment	Data element checked
Part A. Employed persons (Article 12(1))	
Country where worker is posted	Name of host/receiving country where worker is posted
Other details related to the place of work in the host/receiving country	City, address of business activity, etc.
Duration of posting	Start and end dates of posting
	Previous posting periods of the person and gaps
Prior affiliation	Period of coverage under posting state legislation
	Details of activity prior to posting
	Nature of activity in posting and receiving states
Substantial activity of the posting company	Location of company's registered office and administration
	Number of administrative staff in posting and receiving Member States
	Number of non-administrative staff in posting and receiving Member States
	Number of posted employees
	Place of recruitment of posted worker
	Place where contracts with clients are concluded
	Law applicable to contracts with clients and workers
	Number of contracts executed in posting and receiving state
	Turnover in posting and receiving state (%)
	Length of time company is established in posting state
Direct relationship	Responsibility for recruitment
	Company's concluding employment contract and its duration
	Power to terminate contract (dismissal)
	Power to determine nature of work
	Obligation to pay remuneration
	Power to impose disciplinary action
	Worker placed at disposal of another undertaking
Replacement ban	Workers previously posted to the receiving undertaking
	If replacement, why deemed necessary
Specific requirements for temporary work agents (TWAs) based in the posting state	Proportion of workers placed in posting state versus other states

Grounds of assessment	Data element checked
Part B. Self-employed persons (Article 12(2))	
Country where self-employed is posted	Name of host/receiving country where self-employed is posted
Other details related to the place of work in the host/receiving country	City, address of business activity, etc.
Duration of posting	Start and end dates of posting
	Previous posting periods and gaps
Normally self-employed in posting state – prior pursue of activity	Period of self-employment in posting state
Necessary business requirement	Maintaining an office in posting state
	Taxation in posting state
	Maintaining VAT (value added tax) number in posting state
	Registration with chambers or professional bodies in posting state
	Possession of a professional card in posting state
Similar activity in host Member State	Nature of activity in posting and receiving states

5.2. Mapping national practices in grounds of assessment

Key findings from this section

- The mapping of PD A1 assessment grounds reveals a clear hierarchy of convergence – while basic posting details are checked almost universally (see Table 6), more substantive business checks see significant divergence among the national institutions observed. For employed persons (Article 12(1)), all institutions look into start and end dates, the host country and previous posting periods, with 97 % checking the period during which the posted worker was subject to the legislation of the posting state. However, substantial activity assessments vary significantly – company office location checks occur in 83 % of institutions (90 % of PD A1 certificates), turnover checks occur in 53 % of institutions and affect 80 % of PD A1 certificates and company establishment length is verified by only 32 % of institutions. Of the direct relationship criteria, the obligation to pay remuneration is the most consistently checked (63 % of institutions, covering 82 % of PD A1 certificates), while disciplinary action and worker placement remain inconsistent, checked by 43 % of institutions in both cases.
- Self-employed assessments (Article 12(2)) follow similar patterns, with 97 **%** of institutions checking start and end dates and 93 **%** checking previous postings. Of the necessary business requirements, maintaining an office shows moderate consensus (77 **%** of institutions, covering 94 **%** of PD A1 certificates) as does taxation verification (63 **%** and 85 **%**, respectively). However, professional body registration demonstrates notable divergence, being checked by only 40 **%** of institutions, yet affecting 90 **%** of PD A1 certificates due to the checks carried out by high-volume issuing institutions in Germany and Slovakia.
- Analysis of the timing of checks confirms an overwhelming *ex ante* preference among national institutions for checking the basic data elements before issuance, with 93–100 **%** of institutions doing so and a small minority (10 %) primarily reserving *ex post* checks for direct relationship criteria. In terms of the information sources used for such checks, there is heavy reliance on applicant-provided declarations. However, the data element concerning previous posting periods demonstrates the strongest use of internal registers. Among the 38 **%** of employed-person PD A1 certificates that are checked using internal registers, 21 **%** are processed manually versus 17 **%** automatically, while 63 **%** of institutions use internal registers for self-employed persons (affecting 57 **%** of PD A1 certificates).

- The challenges reported by national institutions in terms of conducting assessment grounds can be categorised into three groups: difficulties with legal interpretation (e.g. ambiguous terminology and competing understandings of shared terms), practical obstacles to data collection (e.g. limited access to real-time tax and revenue data) and operational verification problems (e.g. false information and distinguishing genuine from false self-employment).

The operationalisation of posting prerequisites varies considerably across Member States, reflecting differences in administrative capacity, risk management strategies and interpretations of the regulatory framework. This section examines how national institutions translate the theoretical requirements for PD A1 issuance into practical assessment procedures, revealing common approaches and significant variations in implementation.

The aim is to establish a baseline for current assessment practices and quantify the extent to which the various criteria outlined in EU guidance are applied in practice.

To achieve this, the analyses presented in the subsequent sections first **distinguish between the assessment requirements and administrative procedures for employed persons (Article 12(1)) and self-employed persons (Article 12(2))**, recognising that these two categories each face unique assessment procedures.

The chapter first examines the prevalence of each check **among national institutions**, calculating the proportion that verify a particular data element and revealing how widespread a practice is across national authorities. Second, a **volume-weighted analysis** is carried out to determine the **proportion of all PD A1 certificates issued that are subject to a specific check**, which is achieved by weighting the practices of each institution by its annual volume of issued PD A1 certificates. This highlights the real-world impact of assessment practices on the total population of posted workers, distinguishing between practices that are common among high-volume issuers and those that are primarily found in low-volume contexts.

5.2.1. Overview of data elements checked

The scope of assessment practices varies considerably across the national institutions that are observed, ranging from a set of basic checks that are carried out in effectively all cases, to checks that require the collection of more detailed information, which then result in less uniform coverage among the national institutions. While a small number of data elements are almost universally verified, most of which relate to the country where the worker is posted and other details related to the place of work in the host or receiving country, practices for assessing criteria related to prior affiliation and the direct employment relationship show significant divergence.

Employed persons

An initial look at assessment grounds checked by national institutions for **employed persons** (i.e. Article 12(1)) indicates that the collection of data elements containing the basic details of the posting is a widespread, near-universal practice. As shown in Table 6 below, the **start and end dates of the posting** and the worker's **previous posting periods** are both checked by 100 % of the institutions observed by this study, demonstrating a highly harmonised approach to verifying the basic geographic and temporal details of any posting.

Table 6: Overview of data elements checked, employed persons (Article 12(1) PD A1 certificates)

Grounds of assessment	Data element checked	% of institutions	% of Article 12(1) PD A1 certificates
Country where worker is posted	Name of host/receiving country where worker is posted	**100 %**	**99 %**
Other details related to the place of work in the host/receiving country	City, address of business activity, etc.	**93 %**	**94 %**
Duration of posting	Start and end dates of posting	**100 %**	**99 %**
	Previous posting periods of the person and gaps	**100 %**	**99 %**
Prior affiliation	Period of coverage under posting state legislation	**97 %**	**99 %**
	Details of activity prior to posting	**83 %**	**83 %**
	Nature of activity in posting and receiving states	**77 %**	**38 %**
Substantial activity of the posting company	Location of company's registered office and administration	**83 %**	**90 %**
	Number of administrative staff in posting and receiving Member States	**50 %**	**66 %**
	Number of non-administrative staff in posting and receiving Member States	**47 %**	**66 %**
	Number of posted employees	**47 %**	**27 %**
	Place of recruitment of posted worker	**43 %**	**14 %**
	Place where contracts with clients are concluded	**43 %**	**15 %**
	Law applicable to contracts with clients and workers	**27 %**	**21 %**
	Number of contracts executed in posting and receiving state	**20 %**	**11 %**
	Turnover in posting and receiving state (%)	**53 %**	**80 %**
	Length of time company is established in posting state	**53 %**	**32 %**
Direct relationship	Responsibility for recruitment	**47 %**	**78 %**
	Company concluding employment contract and its duration	**67 %**	**78 %**
	Power to terminate contract (dismissal)	**57 %**	**77 %**
	Power to determine nature of work	**53 %**	**74 %**
	Obligation to pay remuneration	**63 %**	**82 %**
	Power to impose disciplinary action	**43 %**	**29 %**
	Worker placed at disposal of another undertaking	**43 %**	**68 %**
Replacement ban	Workers previously posted to the receiving undertaking	**70 %**	**75 %**
	If replacement, why deemed necessary	**53 %**	**63 %**
Specific requirements for TWAs based in the posting state	Proportion of workers placed in posting state vs other states	**23 %**	**5 %**

Legend	0–19 %	20–39 %	40–59 %	60–79 %	80–100 %

Checks on the data elements corresponding to the employer's **substantial activity** demonstrate a significantly lower degree of consistency overall. For instance, the **location of the company's registered office** is verified by a total of 83 % of institutions, covering over 90 % of PD A1 certificates. Yet, for certain data elements concerning the financial details of the employer, coverage is limited. A clear example of this is the data element capturing **turnover in the posting and receiving state**, which is assessed by just over half of all institutions (53 %), while at the same time, this practice covers a substantial 80 % of all PD A1 certificates issued. This substantial volume-weighted figure is heavily influenced by standard procedures in countries such as Poland, where turnover is considered to be an important factor, resulting in over 7 % of all PD A1 certificates issued incorporating this particular check.

At the same time, a reverse trend is seen for the **length of time the company has been established**, which is checked by the same proportion of institutions (53 %) but applies to far fewer PD A1 certificates overall (32 %), suggesting this element is a priority for institutions with lower issuance volumes.

In the case of checks conducted for the purpose of verifying the **direct relationship** between employer and worker, this practice is undertaken by a majority of institutions for most of the related data elements assessed. The data element detailing the **company's concluding the employment contract** is checked by 67 % of institutions, affecting 78 % of all PD A1 certificates, making it the most consistently checked element in this category. The **obligation to pay remuneration**, which is assessed by 63 % of institutions and covers over 81 % of all PD A1 certificates, suggests that it is considered an important indicator of a genuine employment link. The substantive nature of this check is highlighted by the practice in Belgium, where the RSZ reports verifying this element externally against other national authorities' databases to confirm whether the employer is actively paying social security contributions for the employee in question.

The data collected suggests that there is also considerable variation among many of the checks related to anti-fraud. Verification of whether a **worker is placed at the disposal of another undertaking**, a key element for identifying irregular TWA arrangements, is performed by only 43 % of institutions. This check covers over 68 % of all PD A1 certificates, indicating its importance for a number of high-volume PD A1 issuers, such as in Germany (GKV) and Poland. Only 29 % of PD A1 certificates issued check for the data element relating to the **power to impose disciplinary action**, which is checked by 43 % of institutions, indicating the absence of this check among many of the largest posting institutions in EU and EEA countries, such as those in Germany. Finally, the **replacement ban**, which prohibits sending a worker to replace another posted worker whose posting period has ended, is a focus for a majority of institutions (70 %), covering 75 % of all documents issued.

Self-employed persons

Shifting focus to the prevalence of checks carried out by national institutions for self-employed persons (i.e. Article 12(2)), there appears to be a similar degree of consensus on verifying basic geographic and temporal data related to the posting in question, but even greater divergence among the institutions concerned in the case of business-related prerequisites (see Table 7 below).

Table 7: Overview of data elements checked, self-employed persons (Article 12(2) PD A1 certificates)

Grounds of assessment	Data element checked	% of institutions	% of Article 12(2) PD A1 certificates
Country where self-employed is posted	Name of host/receiving country where self-employed is posted	**97 %**	**100 %**
Other details related to the place of work in the host/ receiving country	City, address of business activity, etc.	**97 %**	**100 %**
Duration of posting	Start and end dates of posting	**97 %**	**100 %**
	Previous posting periods and gaps	**93 %**	**100 %**
Normally self-employed in posting state – prior pursue of activity	Period of self-employment in posting state	**90 %**	**100 %**
Necessary business requirement	Maintaining an office in posting state	**77 %**	**94 %**
	Taxation in posting state	**63 %**	**85 %**
	Maintaining VAT number in posting state	**43 %**	**60 %**
	Registration with chambers or professional bodies in posting state	**40 %**	**90 %**
	Possession of a professional card in posting state	**20 %**	**42 %**
Similar activity in host Member State	Nature of activity in posting and receiving states	**83 %**	**94 %**

Legend	0–19 %	20–39 %	40–59 %	60–79 %	80–100 %

Concretely, the essential data elements, such as the **start and end dates** and **previous posting periods**, are checked by nearly all institutions at 97 % and 93 %, respectively. Moreover, the **nature of the activity** to be performed in the host state is another widely performed check, conducted by 83 % of institutions, accounting for 94 % of all PD A1 certificates that are issued to self-employed persons.

A notable area of divergence relates to the assessment grounds of the **necessary business requirements** in the sending state, as detailed in Table 7. The data element for **maintaining an office** is checked by 77 % of institutions, which covers 94 % of all PD A1 certificates, indicating the near universality of this requirement in high-volume countries. More concretely, in Sweden, the issuing institution routinely verifies this (*ex ante*) by requiring the self-employed person to send in evidence that they are actively working in their company. The verification of **taxation in the posting state** is also a majority practice, undertaken by 63 % of institutions and covering nearly 85 % of all PD A1 certificates.

Notably, a significant discrepancy can be observed in the data element pertaining to **registration with chambers or professional bodies**. Specifically, while only 40 % of institutions check this, the practice covers over 90 % of all PD A1 certificates. This gap can be largely attributable to the considerable volume of checks carried out by national institutions in Germany (GKV) and Slovakia, for which this data element is routinely assessed. In contrast, **maintaining a VAT number** is only considered by a total of 43 % of institutions, while the **possession of a professional card** is reviewed by just 20 %, which together indicate a lack of consensus on the importance of carrying out these checks.

In view of the results of the assessment grounds and their underlying data elements conducted by institutions, both for employers and self-employed applicants, the data provide evidence of a relatively consistent hierarchy of checks performed across both Article 12(1) and Article 12(2) PD A1 documents. Concretely, there appears to be a strong consensus among institutions on checking basic geographic, temporal and historical data, but considerable divergence when assessing the more substantive business activities that underpin a posting arrangement.

While this initial overview established **what** is being checked, it is equally important to understand **when** these verifications occur as well. The following section explores the temporal dimension of these assessments.

5.2.2. Timing of verification

When examining the timing of checks, several distinct patterns emerge among the national institutions. More specifically, a clear understanding of when these verifications occur can provide key insights into the type of risk management strategies that are applied by the national institutions. For instance, examining the timing of checks, whether conducted before issuance (*ex ante*) or reserved for subsequent controls (*ex post*), can provide insight into how both the administrative workload of institutions and the speed of document delivery to applicants are shaped.

The data presented in this section reveal a consistent preference for *ex ante* verification across nearly all assessment grounds for both employed and self-employed persons. This practice aligns with the case-law of the CJEU, which obliges issuing institutions to carry out a proper assessment of the facts to guarantee the correctness of the PD A1 certificate before it is issued. This obligation, in turn, serves as a counterbalance to the binding effect of the document. However, while institutions generally conduct a data element check prior to issuing the PD A1 certificate, this front-loaded approach imposes a greater initial administrative workload on both applicants and institutions.

Ex post checks, by contrast, are used far more sparingly and appear to be reserved for specific situations rather than being a widely observed routine procedure. Finally, the proportion of institutions relying on *ex post* checks is in the single digits for nearly all data elements, indicating that deferring verification is the exception rather than the rule.

Employed persons

The analysis reveals a strong preference for *ex ante* verification for employed persons. This is particularly true regarding the basic assessment grounds for the geographic and temporal details of the posting in question (see Table 8 below).

Table 8: Overview of data elements checked ex ante and ex post, employed persons (Article 12(1) PD A1 certificates)

Grounds of assessment	Data element checked	% of institutions: *ex ante*	% of institutions: *ex post*	% of Article 12(1) PD A1 certificates: *ex ante*	% of Article 12(1) PD A1 certificates: *ex post*
Country where worker is posted	Name of host/receiving country where worker is posted	**93 %**	7 %	**93 %**	6 %
Other details related to the place of work in the host/ receiving country	City, address of business activity, etc.	**90 %**	3 %	**88 %**	6 %
Duration of posting	Start and end dates of posting	**100 %**	0 %	**99 %**	0 %
	Previous posting periods of the person and gaps	**97 %**	3 %	**94 %**	5 %
Prior affiliation	Period of coverage under posting state legislation	**97 %**	0 %	**99 %**	0 %
	Details of activity prior to posting	**80 %**	3 %	**78 %**	5 %
	Nature of activity in posting and receiving states	**70 %**	7 %	**33 %**	5 %
Substantial activity of the posting company	Location of company's registered office and administration	**80 %**	3 %	**85 %**	5 %
	Number of administrative staff in posting and receiving Member States	**47 %**	3 %	**61 %**	5 %
	Number of non-administrative staff in posting and receiving Member States	**43 %**	3 %	**61 %**	5 %
	Number of posted employees	**43 %**	3 %	**27 %**	0 %
	Place of recruitment of posted worker	**43 %**	0 %	**14 %**	0 %
	Place where contracts with clients are concluded	**40 %**	3 %	**13 %**	2 %
	Law applicable to contracts with clients and workers	**23 %**	3 %	**16 %**	5 %
	Number of contracts executed in posting and receiving state	**20 %**	0 %	**11 %**	0 %
	Turnover in posting and receiving state (%)	**50 %**	3 %	**75 %**	5 %
	Length of time company is established in posting state	**50 %**	3 %	**27 %**	5 %
Direct relationship	Responsibility for recruitment	**37 %**	10 %	**71 %**	7 %
	Company's concluding employment contract and its duration	**63 %**	3 %	**77 %**	1 %
	Power to terminate contract (dismissal)	**47 %**	10 %	**76 %**	1 %
	Power to determine nature of work	**43 %**	10 %	**73 %**	1 %
	Obligation to pay remuneration	**53 %**	10 %	**75 %**	6 %
	Power to impose disciplinary action	**33 %**	10 %	**23 %**	6 %
	Worker placed at disposal of another undertaking	**37 %**	7 %	**66 %**	2 %
Replacement ban	Workers previously posted to the receiving undertaking	**70 %**	0 %	**75 %**	0 %
	If replacement, why deemed necessary	**53 %**	0 %	**63 %**	0 %
Specific requirements for TWAs based in the posting state	Proportion of workers placed in posting state vs other states	**23 %**	0 %	5 %	0 %

Legend	0–19 %	20–39 %	40–59 %	60–79 %	80–100 %

As illustrated above, all basic data elements, including the **start and end dates of the posting** and the **country where the worker is posted**, are checked *ex ante* by 100 % and 93 % of institutions, respectively, with only two institutions reporting these as *ex post* checks in the case of the latter data element. These findings suggest a near consensus that the basic details concerning a posting must be confirmed before the PD A1 document is issued. The same applies to the **worker's posting history**, for which 97 % of institutions check this data element *ex ante*. The **period of coverage under the posting state legislation** is another element almost exclusively handled *ex ante*, with 97 % of institutions performing this check before issuance.

Even when looking at more complex assessment grounds, including many of those related to **substantial activity**, the *ex ante* approach is favoured in terms of the proportion of institutions and the volume of PD A1 documents. For example, when verifying the **location of the company office**, 80 % of institutions do so *ex ante*, while only a single institution reports this as an *ex post* check. The same pattern applies to data elements covering financial details as well, with 53 % of institutions checking **turnover in the posting and in the receiving state**. Of these, 50 % conduct checks *ex ante* and just one institution implements checks *ex post*. Similarly, the **number of contracts executed** in the sending and receiving states are checked *ex ante* by 20 % of institutions, with none deferring this to *ex post*.

It appears that institutions issuing PD A1 documents either prioritise more complex checks at the outset or do not perform them routinely at all.

The only assessment grounds which see *ex post* checks feature with any regularity are the verification of the **direct relationship**. It is a minority practice with 10 % of national institutions reporting checking elements such as the **obligation to pay remuneration**, the **responsibility for recruitment**, the **power to determine the nature of work**, the **power to terminate the contract** and the **power to impose disciplinary action**, all of which are checked *ex post*. This suggests that a small number of national institutions defer a full verification of employment contract terms.

Two high-volume national institutions offer clear examples of this delayed approach – the French issuing institution carries out *ex post* checks for several basic data elements, including the **name of the host/receiving country where the worker is posted** and the **city and address of business activity**. This represents nearly 6 % of all PD A1 certificates issued being impacted by such *ex post* checks. Similarly, the Spanish issuing institution conducts *ex post* checks on a number of data elements, including the previous posting periods of the person and gaps, along with several data elements related to **substantial activity**. This results in over 5 % of all PD A1 certificates issued being subject to this practice.

Self-employed persons

The abovementioned trend of checks carried out *ex ante* is also observed in the case of PD A1 certificates for self-employed persons (Table 9). Basic data elements, including the **start and end dates**, **previous posting periods** and the **period of prior self-employment**, are checked almost exclusively *ex ante* by over 90 % of national institutions. This suggests a consensus that the geographical, temporal and historical details of the individual's posting must be established before a PD A1 document is granted.

Table 9: Overview of data elements checked ex ante and ex post, self-employed persons (Article 12(2) PD A1 certificates)

Grounds of assessment	Data element checked	% of institutions: *ex ante*	% of institutions: *ex post*	% of Article 12(2) PD A1 certificates: *ex ante*	% of Article 12(2) PD A1 certificates: *ex post*
Country where self-employed is posted	Name of host/receiving country where self-employed is posted	**97 %**	0 %	**100 %**	0 %
Other details related to the place of work in the host/receiving country	City, address of business activity, etc.	**93 %**	3 %	**96 %**	4 %
Duration of posting	Start and end dates of posting	**97 %**	0 %	**100 %**	0 %
	Previous posting periods and gaps	**93 %**	0 %	**100 %**	0 %
Normally self-employed in posting state – prior pursue of activity	Period of self-employment in posting state	**90 %**	0 %	**100 %**	0 %
Necessary business requirement	Maintaining an office in posting state	**67 %**	10 %	**89 %**	5 %
	Taxation in posting state	**57 %**	7 %	**80 %**	5 %
	Maintaining VAT number in posting state	**33 %**	10 %	**52 %**	8 %
	Registration with chambers or professional bodies in posting state	**40 %**	0 %	**90 %**	0 %
	Possession of a professional card in posting state	**20 %**	0 %	**42 %**	0 %
Similar activity in host Member State	Nature of activity in posting and receiving states	**83 %**	0 %	**94 %**	0 %

Legend	0–19 %	20–39 %	40–59 %	60–79 %	80–100 %

As shown in Table 9, this preference for conducting checks *ex ante* extends even to more complex assessment grounds. This includes the **necessary business requirements**, where the use of *ex post* checks is minimal to non-existent for most of the data elements concerned. **Registration with professional bodies** is performed exclusively as an *ex ante* check by 40 % of institutions (covering 90 % of PD A1 certificates issued). Furthermore, of the 64 % of institutions that verify **taxation in the posting state** (covering 85 % of PD A1 certificates), 57 % do so *ex ante*, while only 7 % (represented by two institutions) report using *ex post* checks.

While generally limited, the use of *ex post* verification for self-employed posting is notable for two data elements. First, 10 % of institutions carry out the *ex post* check for **maintaining a VAT number**, resulting in approximately 8 % of total PD A1 certificates issued. Similarly, 10 % of institutions report **maintenance of an office** *ex post*, accounting for a small share of PD A1 certificates issued, 5 % overall. Belgium's national institution, RSVZ, conducts checks for whether an **office is maintained in the posting state** *ex ante*. It may also investigate elements such as the **maintenance of a VAT number in the posting state** *ex post*, particularly in cases of doubt, thereby adopting a hybrid strategy that combines upfront checks with targeted follow-up.

Taken together, the abovementioned trends clearly demonstrate that the prevailing approach to conducting checks against PD A1 assessment grounds is front-loaded verification. This established preference for *ex ante* verification raises an important question: **how** do institutions obtain the necessary evidence to conduct these checks in a timely manner?

The methods used to gather information are an important factor in determining the efficiency of the process and how the administrative workload is divided between applicants and the state. Furthermore, whether institutions rely on applicant-provided declarations and documents or draw directly from internal and external administrative registers consequently shapes the entire nature of the assessment.

The following section therefore explores these different sources of information in detail.

5.2.3. Sources of information

Another factor that shapes the efficiency of the PD A1 issuance process and determines how the administrative workload is distributed between the applicant and the issuing institution is the method by which the necessary information for the issuance is obtained. Whether institutions rely primarily on declarations provided by applicants or draw information directly from internal and external administrative registers (through manual or automatic procedures) reveals key differences in national approaches. The following analysis therefore investigates the primary sources of information used to verify the data elements, distinguishing between practices for employed and self-employed persons, in terms of their prevalence among institutions and their weight relative to the total volume of PD A1 certificates.

Employed persons

A clear pattern emerges when examining the most used sources of information for assessing postings for employed persons: **institutions predominantly rely on information provided by applicants**. The following tables illustrate this pattern from two different perspectives: Table 10 shows the percentage of **national institutions** that use a specific information source (i.e. illustrating the prevalence of the practice), while Table 11 provides a volume-weighted analysis, demonstrating the percentage of **PD A1 certificates issued** that are subject to that same check, thereby illustrating the real-world impact on posted workers overall.

Table 10: Sources of information checked, employed persons (Article 12(1) PD A1 certificates), as % of institutions

Grounds of assessment	Data element checked	Sources of information (as % of institutions)			
		Internal register (manual check)	Internal register (automatic check)	External register (manual check)	External register (automatic check)
Duration of posting	Previous posting periods of the person and gaps	47 %	23 %	0 %	0 %
Prior affiliation	Period of coverage under posting state legislation	33 %	30 %	0 %	3 %
	Details of activity prior to posting	37 %	3 %	0 %	3 %
	Location of company's registered office and administration	17 %	10 %	10 %	7 %
Substantial activity of the posting company	Number of non-administrative staff in posting and receiving Member States	13 %	0 %	0 %	0 %
	Number of posted employees	23 %	3 %	0 %	0 %
	Length of time company is established in posting state	20 %	7 %	7 %	7 %
Replacement ban	Workers previously posted to the receiving undertaking	17 %	0 %	0 %	0 %
Specific requirements for TWAs based in the posting state	Proportion of workers placed in posting state vs other states	10 %	0 %	0 %	0 %

NB: Data elements checked using internal or external registers by less than 10 % of national institutions are excluded.

Table 11: Sources of information checked, employed persons (Article 12(1) PD A1 certificates), as % of PD A1 certificates issued

Grounds of assessment	Data element checked	Sources of information (as % of PD A1 certificates issued)			
		Internal register (manual check)	Internal register (automatic check)	External register (manual check)	External register (automatic check)
Duration of posting	Previous posting periods of the person and gaps	21 %	17 %	0 %	0 %
Prior affiliation	Period of coverage under posting state legislation	3 %	23 %	0 %	0 %
	Details of activity prior to posting	19 %	3 %	0 %	0 %
	Location of company's registered office and administration	2 %	14 %	2 %	0 %
Substantial activity of the posting company	Number of non-administrative staff in posting and receiving Member States	7 %	0 %	0 %	0 %
	Number of posted employees	3 %	5 %	0 %	0 %
	Length of time company is established in posting state	4 %	5 %	0 %	3 %
Replacement ban	Workers previously posted to the receiving undertaking	3 %	0 %	0 %	0 %
Specific requirements for TWAs based in the posting state	Proportion of workers placed in posting state vs other states	3 %	0 %	0 %	0 %

NB: Data elements checked using internal or external registers by less than 10 % of national institutions are excluded.

After applicant declarations, **internal registers** (in terms of both manual and automated checks) are the second most common source of information, particularly among a number of high-volume issuers. In some cases, registers serve as the primary source of information, replacing the need for applicant input. This section focuses on this function, where administrative registers are used as the primary source of information. However, another key use case, where registers are used as a verification tool to cross-check the accuracy of data submitted by applicants, is elaborated on in Section 6.1.

For several data elements, **applicant declarations** remain the primary source of information used in checks carried out by the issuing institution. Specifically, **verifying turnover in the posting and receiving states**, a check affecting 80 % of all PD A1 certificates issued is based on applicant declarations as the primary information source, which are used in cases corresponding to 63 % of all issued PD A1 certificates. This is followed by documentation provided by the applicant in 8 % of cases ([18]). To a similar extent, **verification of the location of the company's registered office** relies on applicant declarations in 52 % of cases. Other data elements reveal a greater reliance on manual processes that are more time-consuming. For example, **verifying activity details prior to posting** relies heavily on **manual checks** of internal registers for 19 % of PD A1 certificates, suggesting a more resource-intensive verification process for both the applicant and the institution concerned.

Checks for the purpose of verifying the **direct relationship** between the employer and the worker also demonstrate a heavy dependence on information sources that are applicant-provided. The data element concerning the **obligation to pay remuneration** is one such example. While this check is performed for a total of 76 % of all PD A1 certificates issued by the observed institutions, the primary information source is applicant declarations, which are used in cases corresponding to 66 % of all issued PD A1 certificates. However, while declarations provided by applicants constitute the most widely used source of information for a given check, in terms of both the proportion of institutions using this source and the proportion of issued PD A1 documents affected, a considerable number of data elements have been identified for which sourcing information from internal (and, in certain cases, external) registers is substantial.

([18]) Specific supporting document(s) provided by the applicant.

Specifically, drawing from registers has the most significant impact on checks of **previous posting periods and gaps for the posted person**. Although 53 % of PD A1 certificates rely on applicant declarations, this data element is **sourced from the institution's own internal registers** for cases corresponding to 38 % of all PD A1 certificates (21 % manually and 17 % automatically), which comes from 70 % of observed national institutions.

This discrepancy, whereby a notably **greater proportion of institutions use internal registers than that of PD A1 certificates affected**, can be attributed to a number of **high-volume issuers continuing to rely primarily on applicant-driven applications** as the initial source of information for conducting checks, as is the case for institutions in countries such as Germany (e.g. DRV, GKV) and Poland (Zakład Ubezpieczeń Społecznych (ZUS)). However, this initial reliance on declarations does not mean they are the sole source of verification. As shown in Section 6.1, many of these same institutions subsequently cross-check applicant-provided information against their internal registers to ensure its accuracy. Therefore, in these high-volume workflows, registers are used more as a verification tool rather than a primary data source.

The prevalence of checks drawing from internal or external registers as the primary information source, including those conducted using automated processes, is largely driven by the institutions responsible for issuing a relatively lower volume of PD A1 certificates. The data element concerning the **period of coverage under the sending state's legislation** is an example of this trend: while applicant declarations are the source of information for only 23 % of national institutions, they account for 64 % of all PD A1 certificates. Despite this, 63 % of institutions carry out the same check using internal registers (33 % manually and 30 % automatically) as the primary information source, yet these institutions account for only 26 % of PD A1 certificates issued. One notable example of a register-based approach is the RSZ's systematic checking of its own records in Belgium. This approach checks the assessment grounds for several data elements for the employed person in question, including the **period of coverage under posting state legislation**, among other things. As a result of this automated approach, the potential for gaps in social security coverage is significantly reduced, while also streamlining the administrative process.

Self-employed persons

In many respects, the assessment model for self-employed persons mirrors that for employees, as it is driven by a strong reliance on information provided by applicants. However, there are a few data elements for which there is a high uptake of internal registers.

For self-employed persons, the verification of the **period of prior self-employment** in the sending state shows a mixed reliance on information sources, with this check being based on applicant declarations for 49 % of PD A1 certificates issued (from 40 % of national institutions), while a notable 15 % of cases (representing 33 % of institutions) verified against internal registers (5 % manually and 10 % automatically) (see Table 12 and Table 13 for more information). For reference, Table 12 outlines the prevalence of these checks across **institutions** (%), while Table 13 provides the volume-weighted analysis showing the impact on **PD A1 certificates issued** (%).

Table 12: Sources of information checked, self-employed (Article 12(2) PD A1 certificates), as % of institutions

Grounds of assessment	Data element checked	Sources of information (as % of institutions)			
		Internal register (manual check)	Internal register (automatic check)	External register (manual check)	External register (automatic check)
Duration of posting	Previous posting periods and gaps	50 %	13 %	3 %	0 %
Normally self-employed in posting state – prior pursue of activity	Period of self-employment in posting state	17 %	17 %	3 %	3 %
Necessary business requirement	Maintaining an office in posting state	10 %	0 %	0 %	0 %
	Taxation in posting state	10 %	7 %	7 %	0 %
	Maintaining VAT number in posting state	3 %	0 %	10 %	0 %

NB: This table excludes data elements checked by less than 10 % of national institutions.

Table 13: Sources of information checked, self-employed (Article 12(2) PD A1 certificates), as % of PD A1 certificates issued

Grounds of assessment	Data element checked	Sources of information (as % of PD A1 certificates issued)			
		Internal register (*manual check*)	Internal register (*automatic check*)	External register (*manual check*)	External register (*automatic check*)
Duration of posting	Previous posting periods and gaps	49 %	9 %	0 %	0 %
Normally self-employed in posting state – prior pursue of activity	Period of self-employment in posting state	5 %	10 %	0 %	0 %
Necessary business requirement	Maintaining an office in posting state	4 %	0 %	0 %	0 %
	Taxation in posting state	0 %	0 %	2 %	0 %
	Maintaining VAT number in posting state	0 %	0 %	14 %	0 %

NB: This table excludes data elements checked by less than 10 % of national institutions.

However, when carrying out checks relating to the **necessary business requirements** in the sending state, the difference in the proportion of information sources checked relative to the share of total PD A1 certificates affected widens considerably. This, in turn, further reinforces the impact of high-volume PD A1 issuers on the system as a whole. Exemplifying this trend is the data element concerning **previous posting periods and gaps**. While this practice is based on applicant declarations for 23 % of national institutions, it impacts 33 % of PD A1 certificates issued. Meanwhile, 63 % of the observed institutions carry out the same check using internal registers (50 % manually versus 13 % automatically), yet this results in 57 % of PD A1 certificates affected (including 49 % manually versus 9 % automatically).

By contrast, verification methods for self-employed persons show a more varied, though still significant, reliance on applicant-provided information as the primary information source. For instance, the check on **maintaining an office**, which applies to 94 % of all PD A1 certificates, sources its information from applicant declarations in cases corresponding to 47 % of all PD A1 certificates issued, followed by applicant-provided documentation in 33 % of cases. Similarly, confirmation of **taxation in the posting state** is verified for 85 % of all PD A1 certificates. For this assessment, both applicant-provided documentation (used for 37 % of all PD A1 certificates) and applicant declarations (used for 36 % of all PD A1 certificates) represent the most frequent information sources, while verification against external registers is used far less often, for just 2 % of all PD A1 certificates. This reliance on documentary evidence for such complex data elements places a considerable administrative workload on self-employed individuals, who in turn must gather and present the necessary paperwork.

Overall, the substantial reliance on information that must be provided directly by applicants, both in the case of Article 12(1) (employed persons) and Article 12(2) (self-employed persons) PD A1 certificates, in addition to the prevalence of manual data sourcing associated with this approach, gives rise to a series of practical and operational challenges for the national institutions. The following section will explore some of these reported difficulties in detail.

5.2.4. Challenges reported by institutions

The considerable reliance on information provided directly by applicants, coupled with the prevalence of manual verification methods, presents a series of challenges for national institutions. Qualitative data collected from these institutions reveal that, while the regulatory framework provides grounds upon which PD A1 applications are assessed, difficulties arise in their practical application. These challenges, reported by institutions across the EU and the EEA, can be categorised into three main areas: issues of **legal interpretation**, **practical problems with data collection** and **operational or technical problems with assessment**. Each of these areas presents distinct issues for the assessment of both employed (Article 12(1)) and self-employed persons (Article 12(2)).

Legal interpretation

Challenges related to legal interpretation are a significant concern for a number of national institutions. For instance, in the case of postings of **employed persons**, a recurrent theme is the lack of precise, harmonised definitions. The

Polish institution ZUS, for example, highlights the difficulty in interpreting the word 'approximately' when assessing the 'approximately 25 % turnover' criterion. To a similar extent, the Dutch SVB notes that certain formal conditions are difficult to test in practice, making their assessment largely theoretical. A key example cited is the prohibition on replacing another worker, as the SVB observes that it is nearly impossible to verify compliance for this condition based on an individual application, as the required information is rarely, if ever, self-declared by applicants.

Box 7: Challenges in legal interpretation reported by institutions issuing PD A1 certificates when implementing assessment grounds checks (Articles 12(1) and 12(2))

Additional examples of reported legal interpretation challenges concerning the assessment grounds that are checked by national institutions include the following.

- Austria (ÖGK). The institution reports that it is impossible for the sending state to verify the replacement ban (i.e. that a worker is not sent to replace another posted person), a condition that only the host country could effectively verify (Article 12(1) – employed persons).
- Belgium (RSVZ). Determining a person's actual place of residence can be complex and requires extensive discussion, especially for individuals with dual residences, creating legal ambiguity despite a theoretically straightforward framework (Article 12(2) – self-employed persons).
- Bulgaria (National Revenue Agency). For self-employed persons working from home, it is challenging to verify the existence of a permanent office in the posting state, a key requirement for maintaining applicable legislation (Article 12(2) – self-employed persons).

For **self-employed persons**, the legal ambiguities are often more fundamental. The Spanish authority TGSS reports that a problem lies in the very definition of the term self-employed, which varies between countries, citing differences in interpretation between Spain and Portugal. This divergence is also seen in the assessment of prior activity, where the Belgian institution (RSVZ) observes that a lenient interpretation of substantial activity in other Member States can undermine the regulation's intent, leading to prolonged secondments.

Data collection

Beyond matters of legal interpretation, institutions also face widespread difficulties in the operational task of gathering the necessary information to conduct an assessment. One key issue identified is the **lack of direct, real-time access to data held by other authorities within the country**, most notably tax and revenue departments. The Czech institution (Česká správa sociálního zabezpečení), for example, explicitly mentions the absence of a direct link with the revenue department as a practical problem. This structural limitation means institutions must rely heavily on applicant-provided declarations and documents.

Box 8: Challenges in practical data collection reported by institutions issuing PD A1 certificates when implementing assessment grounds checks (Articles 12(1) and 12(2))

Additional examples of reported practical data collection challenges concerning the assessment grounds that are checked by national institutions include the following.

- Lithuania (SODRA). The institution reports a lack of access to data about an individual's income in the revenue office (state tax authority) and notes there is no clear definition of what constitutes income from abroad versus income in Lithuania (Article 12(1) – employed persons and Article 12(2) – self-employed persons).
- Poland (ZUS). Accessing data from the Polish tax office is challenging as there is no proper database integration, meaning the institution must submit a formal request each time data is needed (Article 12(1) – employed persons and Article 12(2) – self-employed persons).
- Spain (TGSS). The institution notes that detecting fraud is complicated, and that documentation from other countries must be requested from the worker and then translated, adding a significant administrative layer to the process (Article 12(1) – employed persons).

In the case of posting **employed persons**, this reliance creates verification gaps. The Slovak institution noted a recent and increasing reluctance among subcontractors to provide contracts, citing commercial sensitivity. This, in turn, hinders the

verification of the subcontracting chain. At the same time, the challenges of data collection for **self-employed persons** also present key barriers. For example, the Belgian authority RSVZ reports that it lacks direct access to real-time revenue data and can only request such details retrospectively, typically after a period of two years. This means that turnover-based assessments are initially accepted provisionally and may subsequently be found to be inaccurate. This highlights a wider issue reported by the Austrian institution SVS, which states that it is currently not possible to verify information abroad, meaning that reliance must be placed on applicants providing correct information.

Operational and technical problems

Once the necessary information has been collected, institutions then encounter a final set of operational and technical problems in the assessment itself. For **employed persons**, a key operational difficulty reported by the Cypriot institution (the Ministry of Labour and Social Insurance) is the **allocation of an employer's turnover between Member States**, particularly in the case of cross-border services. This is closely linked to what the Slovak authority describes as its biggest problem: the **deliberate provision of false information** by applicants, especially concerning turnover, in an attempt to meet the required thresholds. This is particularly challenging for newly established companies, where turnover cannot be verified *ex ante*. For **self-employed persons**, a major operational challenge identified by the Slovak institution is tackling **false self-employment**, where an individual registered as self-employed is de facto operating under the authority and subordination of a company.

Another common operational hurdle is verifying the mandatory two-month period of prior activity. The Latvian institution (Valsts sociālās apdrošināšanas aģentūra) reports that many applicants have only recently registered as self-employed, while the Polish authority ZUS states that verifying this prior activity is a 'rather lengthy procedure' that delays the assessment process.

Box 9: Operational and technical challenges reported by institutions issuing PD A1 certificates when implementing assessment grounds checks (Articles 12(1) and 12(2))

Additional examples of operational and technical challenges concerning the assessment grounds that are checked by national institutions include the following.

- Belgium (RSZ). In response to operational challenges, the institution is now integrating connections to additional databases (e.g. for self-employed persons and welfare benefits) to streamline and enhance the accuracy of its eligibility assessments (Article 12(1) – employed persons).
- Lithuania (SODRA). When assessing a company's activity, it is not always easy to clearly identify what income comes from activities in Lithuania versus what comes from abroad, posing an operational assessment problem (Article 12(1) – employed persons and Article 12(2) – self-employed persons).

These varied yet meaningful challenges inevitably influence the way national institutions approach the assessment grounds process. Instances of legal ambiguity, barriers to data collection and operational hurdles may lead authorities to make subjective judgements, which can result in inconsistencies in how assessment grounds are checked and how PD A1 documents are issued.

The convergence of these factors, alongside the wide range of approaches implemented by the institutions observed in detail in this chapter, may result in distinct patterns of convergence and divergence in assessment practices across the EU and the EEA. These patterns will be explored in greater detail in Section 5.2.5.

5.2.5. Convergence and divergences in practice

The preceding analysis of the grounds upon which PD A1 applications are assessed reveals the presence of a wide range of administrative practices being carried out by national institutions across the EU and the EEA. While these institutions operate under a common legal framework, the results demonstrate that assessment grounds are applied in different ways, resulting in **distinct patterns of convergence** on certain fundamental checks and **significant divergence** in areas requiring more substantive or difficult-to-obtain information. These patterns may be influenced by several factors, including institutional decisions relating to risk management and resource allocation, and the practical and legal challenges outlined in Section 5.2.4, such as ambiguous legal definitions and difficulties in accessing reliable data. This section synthesises the key findings identified so far to provide a clear overview of **where national institutions' assessment practices align and diverge** and considers the practical impact of these differences on the PD A1 issuance system as a whole.

A strong pattern of **convergence** emerges in the verification of a worker's fundamental eligibility for posting. This is most evident in the case of data elements that are frequently checked against administrative registers. For instance, **previous posting periods** in the case of employed persons (Article 12(1)) are verified against internal registers by 70 % of national institutions, with a third of those checks (representing 23 % of institutions) being automated. In the case of self-employed persons (Article 12(2)), it is checked by nearly all institutions, with the exception of just two institutions. Similarly, the check for the worker's **prior affiliation** with the social security system of the sending state, specifically the data element concerning the period of social security coverage, is also widely assessed and heavily reliant on register-based checks. Concretely, this element is checked against the internal registers of a majority of institutions (63 %), with nearly half of those checks (30 %) being **automated**. This high rate of register-based verification highlights a key pathway towards more effective convergence. Focusing on data elements that can be cross-checked with administrative registers facilitates more reliable, less labour-intensive and potentially fully automated verification procedures. In turn, this can allow for improved alignment of national practices and enhanced compliance without increasing the administrative burden.

Alternatively, while the **replacement ban** is also widely checked (by 70 % of institutions), its verification is far more reliant on applicant declarations, with only 17 % of institutions consulting registers for this purpose. Likewise, the essential descriptive elements of the posting, such as the **start and end dates** and the **host country**, are necessarily collected from the applicant universally among the institutions observed. Furthermore, the checks described above are almost exclusively performed ***ex ante*,** before the PD A1 certificate is issued.

In sharp contrast, **significant divergences** are evident in the assessment of more substantive informational data elements relating to the employer's activities and their direct relationship with workers. While 83 % of institutions check for the **location of the company's registered office and administration** in the case of employed persons (affecting 90 % of PD A1 certificates), there is considerable variation in the handling of other financial and organisational data elements, such as the **number of contracts executed** and the **place of recruitment**.

One of the most prominent areas of **high-impact divergence** relates to checks for the **substantial activity** of the employer in the sending state, particularly data elements requiring financial details. Just over half of all institutions (53 %) assess the **turnover in the posting and receiving state**. However, as these institutions issue a substantial volume of PD A1 certificates, this check impacts 80 % of all PD A1 certificates. Conversely, 53 % of institutions also check the **length of time a company has been established**, yet this applies to a smaller share of PD A1 certificates (32 %), indicating that this data element is more often a priority for institutions with relatively lower issuance volumes.

Similar disparities are also evident in checks relating to the **direct relationship** between employers and employees. While 67 % of institutions check the data element concerning the **company's concluding the employment contract and its duration** (affecting 78 % of PD A1 certificates), the **obligation to pay remuneration** is the most frequently checked data element in this category. In terms of the total volume of PD A1 certificates, this data element is assessed by 63 % of institutions, covering over 81 % of all PD A1 certificates issued. Accordingly, these findings suggest that it is widely considered an important indicator of a genuine employment relationship, with countries such as Belgium actively verifying this information against national authorities' external databases. In contrast, other data elements, such as the **power to impose disciplinary action**, are checked by only 43 % of institutions, impacting a mere 29 % of PD A1 certificates.

Another notable source of **divergence** stems from the methods used to obtain the information necessary for institutions to carry out assessments. Although reliance on **declarations provided by applicants** remains widespread, there is considerable variation in the extent to which this information is cross-referenced with data from other sources. For instance:

- checking **details of activity prior to posting** relies on manual checks of internal registers for 19 % of PD A1 certificates, indicating a more resource-intensive process in certain Member States;
- conversely, for the **period of coverage under posting state legislation**, only 23 % of institutions use applicant declarations as the source, while 63 % check against internal registers (33 % manually, 30 % automatically).

Similar trends of convergence and divergence can be observed for self-employed persons. The results highlight that basic geographic and temporal details related to the posting, such as the **start and end dates** and **previous posting periods,** are **almost universally checked *ex ante***. Even so, when it comes to the **necessary business requirements** of the sending state, practices vary, such as the following.

- The data element for **maintaining an office in the posting state** is checked by 77 % of institutions (94 % of PD A1 certificates issued), as is the case in Sweden, where the issuing institution routinely requires evidence *ex ante*.
- Checking of **taxation in the posting state** is a practice carried out by a majority of countries observed (63 % of institutions, affecting 85 % of PD A1 certificates that are issued).

- However, a **high-impact divergence** is identified concerning the **registration with chambers or professional bodies**, which is checked by only 40 % of institutions, yet covers over 90 % of PD A1 certificates. This significant coverage is largely due to key high-volume issuers in Germany (GKV) and Slovakia, where this data element is routinely assessed.
- In contrast, **maintaining a VAT number** is checked by only 43 % of institutions (60 % of PD A1 certificates), and the **possession of a professional card** by a mere 20 % (42 % of PD A1 certificates), which may suggest a lack of consensus among issuing authorities as to the importance or capacity to carry out these checks.

An overview of the key findings identified above reveals that, on the one hand, national institutions consistently carry out checks for basic data elements related to the geographic and temporal details of postings on a system-wide basis. On the other hand, there appear to be several divergent practices among the institutions for more substantive data elements. These may require more complex and difficult-to-obtain information, with such variation also applying to the methods used to check these data elements. As revealed by the discussion of challenges in Section 5.2.4, this varied approach to assessment can partly be attributed to practical problems with data collection.

Table 14 summarises the main areas of convergence and divergence among institutions regarding their methods for carrying out checks on assessment grounds and the data elements they verify.

Table 14: Summary of convergence and divergence in key assessment areas

Key assessment area	Practice	Level of convergence/ divergence	Key observations, impact
Fundamental posting prerequisites (Articles 12(1) and 12(2))	Verification of **prior affiliation** within the sending state's social security system and **previous posting periods**.	**High convergence**	The verification of fundamental prerequisites is highly consistent, with **prior affiliation** checked by 97 % of institutions. The verification method also demonstrates convergence, as these checks rely heavily on the use of administrative registers (e.g. 70 % of institutions use registers to check previous posting periods).
Timing of checks (Articles 12(1) and 12(2))	The preference for conducting checks before issuance (*ex ante*) versus after (*ex post*).	**High convergence**	There is clear preference for *ex ante* verification across nearly all data elements, with *ex post* checks being reserved for specific situations, typically carried out by a small minority of institutions (e.g. 10 % of institutions use *ex post* checks for certain data elements related to the **direct relationship**).
Direct relationship (Article 12(1))	Verification of data elements such as the **company's concluding employment contract and its duration** (67 %) and the **obligation to pay remuneration** (63 %).	**Moderate divergence**	The obligation to pay remuneration is the most consistent check among institutions (checked by 63 %, affecting 82 % of PD A1 certificates). However, other data elements under the **direct relationship** are checked less frequently.
Source of information (Articles 12(1) and 12(2))	Reliance on applicant declarations versus checks against internal or external administrative registers.	**Moderate divergence**	Although applicant declarations are used primarily, there is considerable variation in checks being carried out using automated or manual registers.
Substantive employer activity (Article 12(1))	Verification of data elements such as **turnover**, **number of staff**, and **number of contracts executed**.	**High divergence**	The extent that these data elements are checked varies considerably, ranging from 53 % of institutions checking **turnover** to just 20 % checking the **number of contracts executed**.
Necessary business requirements (Article 12(2))	Verification of **maintaining an office**, **taxation**, **VAT number**, and **registration with professional bodies**.	**High divergence**	While **maintaining an office** shows some consistency (77 % of institutions and 94 % of PD A1 certificates), **registration with professional bodies** indicates a notable divergence (checked by 40 % of institutions, affecting 90 % of PD A1 certificates).

5.2.6. Good practices identified

To identify and analyse specific national institutions that demonstrate particularly effective, innovative or efficient models for assessing PD A1 applications, this section highlights four national case studies. Rather than merely showcasing specific features, the aim is to present holistic, institution-wide approaches that successfully balance thoroughness, administrative efficiency, accuracy and reduced applicant workload. Taken together, these approaches could inform potential improvements elsewhere in the EU and the EEA.

Box 10: Good practice 1, Article 12(1) (employed persons)

Social Security Office (RSZ), Belgium

Key strengths

- Automated verification of basic temporal and prior affiliation data elements for employed persons (Article 12(1)). Utilises automated, internal-register-based checks for key data elements such as posting periods and the duration of a company's establishment.
- Automated checks covering a wide range of risk factors. Beyond the basic suite of assessment grounds and their related data elements, the RSZ also assesses over five distinct data elements, including employer investigation status and interim sector activity, via automated processes.
- Reliance on internal register checks for a majority of assessed data elements. Reduces the requirement for applicant-provided documentation by sourcing information directly from its own databases.

Analysis and rationale

The **Belgian RSZ** takes a highly automated approach to carrying out checks for employed persons (Article 12(1)), significantly reducing the need for documentation provided by applicants. Specifically, data elements such as the **period of coverage under posting state legislation**, **previous posting periods of the person and gaps** and the **length of time the company has been established in the posting state,** among other things, are not reliant on applicant declarations, but are instead checked via an automated process using an internal register.

Additionally, the RSZ carries out automated checks on a number of **risk-based factors** that go beyond the standard set of assessment grounds and related data elements that are applicable to the institutions observed. For example, the automated checks carried out by the RSZ also aim to assess **if an employer is under investigation**, **if the employer is registered as active during the PD A1 period** and **if the requested period is longer than three months for the interim sector**, all without requiring input from the applicant.

Impact and outcome

In practice, this heavy reliance on automated checks using internal and external registers would lead to a significant streamlining of the assessment process and reduce the administrative workload on the relevant institution. Accordingly, this would also lead to the co-benefit of increased accuracy in the initial verification process, while demonstrably lowering the administrative workload on applicants, who would no longer be required to submit extensive evidence for data already held or easily obtained by the administration.

Box 11: Good practice 2, Article 12(1) (employed persons)

Social Insurance Board (Sotsiaalkindlustusamet), Estonia

Key strengths

- Widespread use of external registers for checking prior affiliation data elements for employed persons (Article 12(1)). Utilises a combination of automated and manual checks against other national authorities' databases.
- Reliance on external register checks for key employer-related data elements. Checks company establishment, location and the employment contract directly against external registers, reducing the need for applicant-provided declarations.

Analysis and rationale

The model presented by the Estonian Social Insurance Board for employed persons (Article 12(1)) is characterised by its focus on leveraging administrative data from external sources. In turn, this approach results in a reduced reliance on applicant-provided documents for key prior affiliation criteria. Data elements such as the **length of time a company has been established in the posting state** and the **location of the company's registered office and administration** are verified via an **external register** using an **automated** process.

Additionally, the institution employs a hybrid approach, using an **external register** (via a manual check) for data elements such as **the company's concluding employment contract and its duration**.

Impact and outcome

The board's extensive use of external registers is likely to result in greater data accuracy, as information is verified against official external sources. Consequently, this approach then reduces the administrative workload on applicants, as they are not required to source and submit documents for information already recorded in other registers.

Box 12: Good practice 3, Article 12(2) (self-employed persons)

Social Insurance Agency (Sociálna poisťovňa), Slovakia

Key strengths

- Application of a dual source-checking method for all 'necessary business requirement' data elements for self-employed persons.
- Consistent use of checks against external registers. Routinely cross-references applicant-provided documents against external data sources for all key business prerequisites in addition to applicant-provided documentation.
- Comprehensive verification scope for business activity. The practice of dual source verification is applied to all five data elements related to the business activities of the employer, including office, taxation, VAT, professional body registration and self-employment period.

Analysis and rationale

The model presented by the Slovakian **Social Insurance Agency** takes a highly thorough approach to conducting checks for Article 12(2) PD A1 certificates (self-employed persons). This is largely driven by the institution's consistent use of manually checked information provided by applicants, alongside **cross-referencing with external registers** using both automated and manual methods.

This dual approach is applied to all data elements concerning **necessary business requirements**, including **maintaining an office**, **taxation in the posting state**, **maintaining a VAT number**, **registration with chambers or professional bodies** and the **period of self-employment**.

Impact and outcome

This practice, which involves carrying out checks on both applicant-provided documents and automated checks via external registers, would, in principle, result in a higher degree of assurance in the credibility of the checks being carried out. At the same time, however, this approach does place a greater administrative workload on both the applicant and the institution in certain cases.

Box 13: Good practice 4, Article 12(2) (self-employed persons)

Health Insurance Institute of Slovenia (Zavod za zdravstveno zavarovanje Slovenije), Slovenia

Key strengths

- Automated verification of all five 'necessary business requirement' data elements for self-employed persons (Article 12(2)) via a single check. The automated check covers all five of the specified data elements relating to business activity, ranging from business registration to social insurance coverage status.
- Leverages a direct, automated connection to specific external registers. The check queries both the Slovenian business register and the health insurance institute.

Analysis and rationale

Slovenia showcases an efficient model for the self-employed by streamlining the verification of all necessary business requirements. This category includes the assessment of **maintaining an office**, **taxation in the posting state**, **maintaining a VAT number**, **registration with chambers or professional bodies** and **possession of a professional card**.

Rather than verifying each of these elements individually or relying on documents provided by applicants, the institution performs **a single, automated check**. Specifically, this check confirms that the business has been formally registered for at least two months (via the Slovenian business register) and that the individual has maintained social insurance coverage for at least 60 days (via the health insurance institute). The institution then considers a positive result from this integrated check to be sufficient evidence that **all five necessary business requirements** have been met. This is complemented by an automated internal check for the **period of self-employment** in the posting state.

Impact and outcome

The targeted use of automation linked to specific external registers, as demonstrated by Slovenia, indicates a high degree of administrative efficiency relative to the institutions observed. This approach substantially reduces the administrative workload on self-employed applicants, as they no longer need to provide evidence of their business and insurance status, while also lessening the administrative workload on the institution itself, as this information is checked automatically from external sources.

These successful approaches are underpinned by a common principle: the strategic use of administrative data sources, whether internal or external, often via automated processes, to improve the efficiency of the verification process. While these practices demonstrate effective approaches for ensuring compliance, the varying degrees of automation and reliance on different information sources directly impact the workload of institutions and the effort required from the applicants.

Section 5.3 will examine these impacts in greater detail by assessing their resulting administrative workload.

5.3. Assessment of administrative workload

Key findings from this section

- Administrative workload varies widely across national institutions, but the drivers differ for applicants and institutions. For applicants, the usability and features of the portal show the highest average workload, indicating common issues concerning authentication, prefilling/reusing data, tracking and bulk handling. In contrast, scores for other criteria, such as information requirements and the complexity of the application process, are more evenly distributed, suggesting that institutions do better in these areas relative to the institution with the lowest workload score. For institutions, higher averages in the verification effort and level of automation in processing dimensions reflect extensive *ex ante* checks and inconsistent automation, whereas the handling of changes criterion is closer to the best-performing institution. Taken together, these patterns highlight that improvements in usability features for applicants and more precise calibration of what is checked and how it is checked for institutions are areas with room for improvement.
- The comparative analysis section uses a simple 2×2 matrix of workloads to take a closer look at where institutions are positioned in the low/high applicant workload versus low/high institutional workload classifications. In the low–low group, common strengths include focused information requirements paired with the use of automated verification mechanisms, useful portal functionality and integrated handling of changes. Conversely, the high–high group tends to combine broad information requirements with intensive *ex ante* verification and insufficient automation, while change procedures are less consistently embedded in the application process. Together, these factors result in higher effort for both applicants and institutions. The remaining quadrants show asymmetric patterns: where applicant workload is high but institutional workload is low, institutions largely shift effort to applicants via expansive information requirements. Where the applicant workload is low, but the institutional workload is high, the authorities absorb the effort by performing more checks with relatively low automation, while applicants enjoy streamlined application processes with rich portal features.

As demonstrated in Section 5.2, the assessment and issuance of PD A1 certificates in posting situations requires a series of factual checks to be carried out by national institutions within varying administrative contexts. In practice, national institutions decide not only which assessment elements to verify, but also when to verify them (*ex ante* prior to issuance or *ex post* through subsequent controls) and how to source the necessary information (from applicants, internal registers or other authorities). Understanding this day-to-day operational reality is essential to gauging the feasibility of the implementation of Article 12 and to identifying where workload falls on applicants and institutions alike. Building on the mapping of grounds for assessment under Section 5.2, the analysis in this section offers an evidence-based view of administrative workload as it arises from routine PD A1 practices. It first traces the practical operationalisation of checks across Member States and EEA countries, i.e. which data elements are considered in standard procedures, how consistently they are examined *ex ante* versus *ex post*, the extent of reliance on declarations, supporting documents, and register-based information, the features of the application portals and the degree of automation at each step of the process.

For the purpose of this section, **administrative workload** is disaggregated into two dimensions. The first concerns applicants (employers and self-employed persons) and captures the effort, time and complexity of preparing and submitting an application for PD A1 certificates. This includes aspects such as the type of information or evidence required, and the structure, features and usability of the application platforms. The second relates to national institutions and addresses the workload associated with the scope and timing of checks, the effort devoted to verification (manual versus automated), the level of automation/robotisation in processing and interconnection with the EESSI system and the handling of changes to the application. These dimensions are assessed using the structured dataset compiled via the questionnaire and interviews that were used to consult with the national institutions responsible for processing and issuing PD A1 certificates in the EU and the EEA, enabling transparent, multi-dimensional comparisons across countries.

5.3.1. Methodological approach to calculating administrative workload

To facilitate such a comparison, a quantitative administrative workload score is constructed that enables a comparison across countries. First, raw questionnaire responses are converted into scores. Then, these scores are normalised to a common scale between 0 and 1 using min–max scaling across all 32 national institutions observed, with the direction of this scaling meaning that a higher score implies a higher administrative workload. For each country, these normalised criterion scores are then aggregated by weighted averaging for both applicants and institutions to produce two composite scores (equal weighting across criteria, in line with a neutral baseline).

A weighting is applied to the questions to reflect the complexity and breadth of information required to answer each question, as it is likely a good indication of the administrative workload involved. In practice this results in a higher weight only for Question 28 (Q28) (see Annex I for the full list of questions) that involves information on eight different grounds of assessment for employed persons (Article 12(1)) (e.g. location, duration of posting, prior affiliation) and seven for self-employed persons (Article 12(2)). Additionally, an aggregation of the score for Q28 for employees and self-employed persons is performed based on the proportion of PD A1 certificates issued for each group, in order to correctly reflect the administrative workload for each institution. The chosen weight was equal to the average number of grounds of assessment covered by the question. The resulting impact matrix of normalised criteria then provides the basis for interpretation and analysis. Beyond ranking countries by their composite scores, this methodological approach reveals which specific criteria drive certain results (i.e. higher or lower administrative workload) and, when taken together with qualitative evidence, can be used to identify overarching patterns, common challenges and national strengths and weaknesses, along with potential good practices. Table 15 summarises the key points of each of the three criteria.

Table 15: Framework for assessing administrative workload on applicants

Objective	Criterion	Relevant questionnaire questions and indicators
Minimise effort required for application	**A1. Complexity of information/evidence required**	**Q28 (Tables A and B).** The number and type of data elements applicants must provide *ex ante*. A higher number of data points and a greater reliance on submitting supporting documents indicate a higher workload.
	A2. Application process complexity	**Q12 & Q12.1.** Whether the application process is fully online. A lack of a fully online process suggests a higher workload. **Q15.** Procedures for managing retroactive applications. **Q6.** The existence of non-digital application processes.
Maximise clarity and ease of use	**A3. Portal/tool usability and features**	**Q10.** The accessibility and complexity of authentication methods. **Q19.** The availability of user-friendly features (e.g. bulk requests, prefilled data, application tracking, help functions). The presence of such features is indicative of a lower workload.

5.3.2. Administrative workload on applicants

The following section will address the factors contributing to increased administrative workload for applicants.

5.3.2.1 Complexity of evidence required (A1)

For applicants, the composite score is based on **three criteria** that, together, reflect the practical steps involved in obtaining a PD A1 document. First, the **complexity of information/evidence required (A1)** captures how much applicants must assemble up front, both the breadth of data points and the reliance on supporting documents. Where national institutions expect numerous elements to be provided *ex ante*, the time and coordination effort rise accordingly.

In practice, the data elements for employed persons cover the following:

- the place of work (host country, location details);
- duration of posting (start/end dates and any prior postings);
- prior affiliation in the sending state (period of coverage, activities before posting);
- substantial activity of the posting company in the sending state (registered office/administration, staffing, turnover, contracts); and

- direct relationship between employer and posted worker (recruitment and contractual control – who concludes the contract, who pays, who can dismiss, who directs work, whether the worker is placed at the disposal of another undertaking and whether there is a replacement).

In the case of **self-employed persons**, equivalent elements include host location and duration, prior postings, period of self-employment, establishment of tax/VAT and its status, professional registrations/cards and the nature of activity. Where evidence is requested *ex ante*, institutions may require supporting documents in addition to declarations, for example employment or service contracts, proof of prior affiliation / insurance, company register extracts, staffing lists or payroll records, invoices or client contracts, turnover statements, tax/VAT certificates and professional cards/registrations (as applicable). The more items that must be gathered, the higher the applicant workload. Nevertheless, it is important to highlight that because all mapped data elements are legally required, requesting fewer items may reduce applicants' workload but also risks a less thorough assessment of the posting situation and verification of compliance with posting conditions.

5.3.2.2 Application process complexity (A2)

Second, the criterion **application process complexity (A2)** reflects the effort embedded in the process and flow of the overall application. This aspect considers questions on the overall characteristics of the application process, such as digitalisation or handling of retroactive applications. Fully digital submission is associated with a lower workload, whereas paper, postal or email-based steps, or offline actions within otherwise online processes, add time and require extra effort from applicants. The treatment of retroactive requests also matters, as clear, streamlined procedures can reduce redoing work and avoid repeated contact with the institution.

5.3.2.3 Portal and tool usability features (A3)

The third criterion, **portal and tool usability features (A3)** captures how easily applicants can access the online system and how efficiently they can complete a submission once logged in. On access, the questionnaire distributed to national institutions asked which authentication methods are accepted (e.g. national e-IDs, business or tax identifiers or portal credentials) and who can use the tool. These access features determine whether users can log in without extra steps, paperwork or proxy arrangements. Where authentication is widely usable, quick to obtain and interoperable, the effort to access the application system is lower. Conversely, where access hinges on restrictive credentials or domestic schemes only, it is higher. Additionally, this section includes user-friendly features that reduce repetitive input and uncertainty. It asks whether applicants can submit in bulk, reuse or prefill information from prior filings, track the application's status, receive notifications, benefit from integrated help functions and chatbots, and whether information can be uploaded or pulled automatically from registers. Each of these features addresses specific points that require manual effort from applicants. Prefilled data reduces manual entry, bulk handling scales routine filings, status tracking limits follow-up contacts and in-tool help reduces errors and redoing work. A richer feature set therefore corresponds to a lower observed administrative workload on the applicants.

Taken together, these three aspects provide a structured and multi-dimensional view of the administrative workload that falls on applicants. They quantify what must be assembled, how the procedure must be navigated and how usable the tools are in practice.

5.3.2.4 Results

Based on these criteria, Table 16 presents the normalised scores for applicants. The distribution of composite scores for applicants is wide, indicating a wide dispersion across countries and national institutions. From the 32 national institutions observed, scores range from 0.11 (Spain) at the low end to 0.79 (Latvia) at the high end, with an average of 0.34 (e.g. Denmark, Italy and Luxembourg) overall, indicating that some systems require comparatively little effort from applicants while others still involve substantial effort. These differences reflect distinct configurations of information demands (Q28), the degree to which submission flows are fully online (Q12, Q12.1) and the presence of usability features (Q10, Q19) captured in the questionnaire and normalised in the impact matrix. To facilitate a visually intuitive comparison, the scores are colour-coded such that a higher administrative workload (and therefore a higher score) is reflected by the colour red, while a lower administrative workload (and lower score) is reflected by green.

Based on the administrative workload scores that are generated as per Table 16, the range of outcomes can be sorted into three groups. First, the **low-workload group** (e.g. Belgium (RSZ), Spain, Austria **(ÖGK)** and Finland) combines lighter information requirements with fully online or streamlined workflows and at least a baseline of usability features. At the other extreme, the high-workload group (e.g. Croatia, Hungary, Iceland, Latvia and Sweden) is characterised by extensive up-front information demands, often for both employed persons (Article 12(1)) and the self-employed (Article 12(2)), along with

obstacles in the application channel (e.g. not fully online or additional steps), with usability features being insufficient to offset these. The remaining countries fall into a **medium-workload profile** (e.g. Denmark, Ireland, Italy and Slovakia) where one or two aspects (typically the breadth of information required) push scores up, while others (e.g. online submission) pull it in the opposite direction.

What is clear from the analysis is that the application process for PD A1 certificates varies greatly between national institutions. Under a common legal framework, authorities make different choices about what must be submitted or declared *ex ante*, which elements are verified and when, and how information is sourced (declarations versus registers, manual versus automated). These choices translate directly into the applicant-facing effort captured in the composite workload score. Specifically, the mapping of grounds of assessment shows strong convergence on core posting details (e.g. host country, start/end dates and prior postings) but substantial divergence for checks related to prior affiliation, the direct employment relationship or financial/activity indicators. In practice, this means that some institutions do not check certain substantive items at all or defer them to *ex post* controls. Thus, the scores for administrative workload should be read with care. A higher value may signal inefficient or outdated systems and channels, but it can just as well reflect a deliberate choice to perform more extensive validations early in the process.

Table 16: Normalised scores for each question involved in the administrative workload score for applicants

	A1. Complexity of information/ evidence required	A2. Application process complexity				A3. Portal/tool usability and features		
Country	Q28	Q12	Q12.1	Q15	Q6	Q10	Q19	Final score
AT (ÖGK)	0.14	0.00	0.00	0.00	0.00	0.67	0.50	0.17
AT (SVS)	0.14	0.00	0.33	0.00	0.00	0.83	1.00	0.24
BE (RSVZ)	0.10	0.00	0.00	0.00	0.00	0.83	0.50	0.15
BE (RSZ)	0.34	0.00	0.00	0.00	0.00	0.50	0.17	0.24
BG	0.24	0.00	0.33	0.00	0.00	0.33	0.67	0.23
CY	0.06	n/a	0.00	n/a	1.00	1.00	1.00	0.25
CZ	0.35	0.00	0.33	0.00	0.00	0.17	0.17	0.24
DE (ABV)	0.29	1.00	0.33	0.00	0.00	0.17	0.67	0.32
DE (DRV)	0.46	1.00	0.00	0.00	0.00	0.17	0.67	0.39
DE (GKV)	0.71	0.00	0.00	0.00	0.00	0.00	0.67	0.45
DK	0.38	0.00	0.00	0.00	0.00	0.83	0.83	0.33
EE	0.38	0.00	0.00	0.00	0.00	0.50	0.33	0.27
ES	0.05	0.00	0.00	0.00	0.00	0.50	0.67	0.11
FI	0.23	0.00	0.00	0.00	0.00	0.33	0.00	0.15
FR	0.29	0.00	0.00	0.00	0.00	0.50	0.17	0.21
HR	0.72	0.00	0.00	0.00	0.00	0.83	0.33	0.48
HU	1.00	1.00	0.00	0.00	0.00	0.67	1.00	0.75
IE	0.41	0.00	0.00	0.00	0.00	0.67	0.67	0.32
IS	0.42	1.00	1.00	1.00	1.00	0.83	0.67	0.64
IT	0.24	0.00	0.00	1.00	0.00	0.83	0.83	0.33
LI	0.00	1.00	1.00	1.00	1.00	0.83	1.00	0.43
LT	0.29	0.00	0.00	0.00	0.00	0.83	0.33	0.25
LU	0.19	1.00	0.33	0.00	0.00	0.83	0.67	0.32
LV	0.67	1.00	1.00	1.00	1.00	0.67	1.00	0.79
NL	0.07	0.00	0.00	0.00	0.00	0.83	0.33	0.12
NO	0.14	0.00	0.00	0.00	0.00	0.50	0.83	0.18
PT	0.57	0.00	0.00	0.00	0.00	0.83	0.50	0.42
SE	0.79	1.00	0.67	0.00	0.00	0.67	0.50	0.65
SI	0.09	0.00	0.33	1.00	0.00	0.83	0.67	0.26
SK	0.55	0.00	0.00	0.00	0.00	0.83	0.33	0.39

5.3.2.5 Comparative strengths and weaknesses across institutions

Looking at the results from Table 16, average workload scores appear to be highest for the **portal and tool usability features (A3)** criterion, indicating that across most institutions, the extent of administrative workload faced by applicants is heavily moderated by the user-friendliness of such a tool. Generally, even where **information demands (A1)** are manageable and **processes are online (A2)**, applicants still encounter obstacles within the application tool itself. In this criterion, countries such as Czechia and Finland emerge as leaders, while countries such as Austria (SVS), Cyprus and Liechtenstein perform more poorly in this regard. Other countries with a low workload for applicants from other criteria, such as Belgium (RSVZ), Lithuania, Norway and Spain, exhibit a relatively high score (and therefore a high administrative workload), meaning that their comparatively light information requirements (A1) and streamlined application processes (A2) are pulled down by the performance and user-friendliness of their portal. The persistent gap in the best performers points to common challenges in portal functionality, notably restrictive or fragmented authentication pathways, limited prefilled/reused data, absent status tracking and proactive notifications, and a lack of bulk or repeat-filing options. In practical terms, these missing or partial features translate into avoidable steps, re-entry of data and follow-up contacts that inflate the observed workload. These patterns also suggest a potential responsive policy lever: portal usability upgrades are a cross-cutting opportunity to reduce applicant workload across countries.

By contrast, **information and evidence requirements (A1)** shows a more balanced profile across institutions, suggesting a relatively even distribution in terms of the level of effort required by applicants. Here, the institutions with the lowest information requirements are Cyprus, Liechtenstein and the Netherlands, while the less performant institutions include Germany (GKV), Hungary and Sweden. In practical terms, most national institutions converge on a common set of core data elements for PD A1 issuance, with the extent of variation in administrative workload being driven by a handful of additional information and evidence requirements (e.g. certain proof of prior affiliation or company activity). Compared to portal usability, this criterion shows smaller gaps relative to the best-performing institutions. It also highlights specific areas for improvement, such as replacing document uploads with register lookups where possible and providing clearer guidance in order to reduce the frequency of resubmissions.

Finally, the criterion for **application process complexity (A2)** records the lowest average workload, indicating that relative to the best-performing institutions, countries are closer to the frontier on process design. In practice, this means that most of the institutions observed have introduced a fully online application process with integrated retroactive application handling, while some institutions (including Hungary, Iceland and Sweden) still rely on offline steps to varying degrees. Overall, this suggests that there is broad convergence on the handling of retroactive applications and fewer mandatory offline actions, with remaining gaps concentrated in specific items (e.g. occasional fallback to paper/email or manual processing of retroactive applications). Nevertheless, strong institutional performance for this criterion (A2) does not by itself guarantee a low overall workload, as heavy **information demands (A1)** or inadequate **portal functionality (A3)** can still create additional effort even within a fully online application procedure.

5.3.3. Administrative workload on institutions

For institutions, the composite score draws on three criteria that reflect the operational workload of processing PD A1 requests and maintaining the integrity of decisions. First, **verification effort (B1)** measures how extensively and at what stage in the process the authorities examine the grounds for assessment. This includes the number of data elements routinely checked, whether these checks are carried out before issuance or deferred to *ex post* controls and how these checks are performed, i.e. whether they involve manual review of applicant documents or checks performed against internal or external registers and other automated channels. Second, the **level of automation in processing (B2)** assesses the extent to which the issuance workflow is automated end-to-end, including the share of PD A1 decisions produced without human intervention and the degree of interconnection with the EESSI system. Third, **handling of changes (B3)** looks at how institutions manage notifications during the posting period and whether those changes trigger an amended or new PD A1 certificate.

5.3.3.1 Verification effort (B1)

In practice, the **verification effort dimension (B1)** criterion covers the same data elements mapped for applicants: place of work and duration (including prior postings), prior affiliation in the sending state, indicators of substantial activity of the posting company (registered office/administration, staffing, turnover, contracts) and the direct relationship between employer and posted worker (who recruits, pays, directs and can dismiss; placement at another undertaking; replacements). For each element, the questionnaire records whether it is typically considered, when it is checked (*ex ante* or *ex post*) and from which source (e.g. declaration, supporting documents, internal registers, external registers). In this case, the administrative workload score is higher if more items need to be checked by the institutions *ex ante*, differentiating between automated and manual checks. Other questions in this criterion build on that mapping to distinguish how information is validated. Alongside applicant

declarations and documents, institutions may cross-check data in their own registers (manually or via automated matches) and in other authorities' registers, supported in some cases by risk-based tools or automated red flag routines. Where verification relies predominantly on manual document review or requests for originals/certified copies, the workload on caseworkers is higher than when systematic, automated register comparisons are available.

Adding to the verification effort on the institution side is the fact that more than 90 % of institutions indicated that they also carry out, on some level, systematic *ex ante* verification of the information or documents submitted by the claimant in PD A1 applications, which would include verifying the documentation provided against institutions' internal or external registers or automated red flag systems. This suggests that the information being provided for certain grounds of assessment already exists within the national institutions carrying out the checks, thereby increasing the administrative workload overall. Accordingly, this potential duplication of effort may reflect the underlying security anti-fraud protocols of such institutions. However, the precise reasoning behind this duplication cannot be inferred from the questionnaire results alone.

5.3.3.2 Level of automation in processing (B2)

The **level of automation in processing (B2)** looks at how much the issuance process is robotised and where human intervention remains necessary. The questionnaire and interviews that were used to consult with national institutions capture the overall extent of automation and any algorithms that were used to check specific prerequisites, the proportion of decisions produced automatically and the connectivity with the EESSI system. Therefore, higher values on these indicators signal streamlined workflows and less staff time per case. This criterion also includes innovative elements that go beyond baseline automation (e.g. data-driven features or advanced interconnections).

5.3.3.3 Handling of changes (B3)

Finally, **handling of changes (B3)** assesses the efficiency with which institutions process notifications during the posting period. This involves questions such as which channels are used, whether the tool supports these updates and whether changes result in an amended or new PD A1 certificate. In terms of how this relates to potential administrative workload, the rationale is that clear, tool-based workflows minimise the need for back-and-forth communication with applicants and therefore reduce the effort required for re-assessment, whereas fragmented or offline handling creates an additional workload and increases processing time.

Taken together, these three assessment criteria provide a structured and multi-dimensional view of the administrative workload borne by institutions. They capture what is checked and how facts are verified in practice, the degree of automation and interconnection in the issuance workflow and how changes during the posting period are handled.

Table 17: Framework for assessing administrative workload on institutions

Objective	Criterion	Relevant questionnaire questions and indicators
Minimise processing workload	**B1. Verification effort (e*x ante*)**	**Q28 (Tables A and B).** The number of data elements checked *ex ante* versus *ex post*. A greater reliance on *ex ante* checks suggests a higher institutional workload. **Q30.1.** The extent of *ex ante* verification. A reliance on manual checks of documents indicates a greater effort than automated checks. **Q30.2.** The reported level of automation of verification checks.
Maximise procedural efficiency	**B2. Level of automation in processing**	**Q24.** The reported extent of automation/robotisation in the issuance process and the algorithms used. **Q25.** The proportion of PD A1s issued with human intervention versus without human intervention. A higher proportion issued automatically indicates greater efficiency. **Q20.** Integration with the EESSI system.
Optimise resource use	**B3. Handling of changes**	**Q18.** Procedures for handling changes during the posting period and whether a tool is used.

5.3.3.4. Results

Based on these criteria, Table 18 presents the normalised scores for institutions. The distribution of composite scores for national institutions is rather wide, indicating significant differences in administrative workload between national institutions. Among the 32 institutions observed, scores range from 0.09 (Luxembourg) at the low end to 0.90 (Bulgaria) at the high end,

with a mean of 0.46 overall, which is comparable to the workload scores observed for Belgium (RSZ), Italy and Slovenia. Table 17 operationalises three scoring criteria: **verification effort (B1)** (number and timing of data elements checked (Q28), how facts are validated *ex ante* (Q30.1 and Q30.2)), **level of automation in processing (B2)** (robotisation (Q24),share of automatic issuance (Q25) and EESSI system interconnection (Q20)) and **handling of changes (B3)** during the posting period (Q18).

Grouping institutions into three clusters reveals distinct patterns. The **low-workload group (e.g. Germany (ABV and GKV), Spain and Finland)** combines narrower *ex ante* assessment scopes with fewer verifications and higher automation and simpler change-handling, yielding lower institutional administrative workload. At the other extreme, the **high-workload group (e.g. Bulgaria, Estonia, Croatia, Latvia, Austria (SVS), Slovakia and Sweden)** is characterised as having broader *ex ante* scopes, more intensive verification and more involved handling of changes, with limited automation or automation insufficient to offset workload, thereby resulting in a higher workload. The remaining institutions fall into a **medium-workload profile** where one or two aspects, typically verification intensity or scope, push their respective workload scores up, while others, such as automation or change-handling design, pull them in the opposite direction (e.g. Belgium (RSZ), Czechia, Denmark, Luxembourg, the Netherlands, Norway and Portugal).

Table 18: Normalised scores for each question involved in the administrative workload score for institutions

	B1. Verification effort (*ex-ante*)		B2. Level of automation in processing				B3. Handling of changes	
Country	Q28	Q30.1	Q30.2	Q24	Q25	Q20	Q18	Final score
AT (ÖGK)	0.19	0.50	0.00	0.00	0.02	0.00	0.00	0.14
AT (SVS)	0.75	1.00	n/a	1.00	1.00	1.00	0.00	0.71
BE (RSVZ)	0.19	0.75	0.00	0.00	0.00	0.00	1.00	0.23
BE (RSZ)	0.56	0.75	0.00	0.00	0.20	0.00	1.00	0.46
BG	0.99	0.75	1.00	1.00	1.00	1.00	0.00	0.90
CY	0.25	1.00	1.00	1.00	n/a	n/a	n/a	0.29
CZ	0.34	0.75	0.67	1.00	1.00	1.00	0.50	0.55
DE (ABV)	0.00	0.00	n/a	0.33	1.00	1.00	0.50	0.21
DE (DRV)	0.18	0.50	0.00	0.00	0.20	1.00	0.50	0.26
DE (GKV)	0.00	0.50	0.00	0.33	0.40	1.00	0.50	0.20
DK	0.12	0.50	n/a	0.33	0.95	1.00	0.50	0.31
EE	0.81	0.50	0.67	1.00	1.00	1.00	0.50	0.80
ES	0.13	0.25	n/a	0.33	0.25	0.00	1.00	0.21
FI	0.12	0.75	0.00	0.00	0.31	0.00	0.50	0.18
FR	0.31	1.00	0.00	0.00	0.10	0.00	0.00	0.25
HR	0.93	0.75	1.00	0.33	0.10	0.00	0.50	0.72
HU	0.00	0.50	1.00	1.00	1.00	1.00	0.00	0.33
IE	0.73	1.00	1.00	0.67	0.00	1.00	0.50	0.71
IS	0.54	0.50	1.00	1.00	1.00	1.00	0.00	0.63
IT	0.38	0.75	1.00	1.00	1.00	0.00	0.00	0.49
LI	0.50	0.75	1.00	1.00	1.00	1.00	0.00	0.63
LT	0.50	0.50	1.00	0.67	1.00	1.00	0.50	0.62
LU	0.00	0.75	0.00	0.00	0.02	0.00	0.50	0.09
LV	1.00	0.00	1.00	1.00	1.00	1.00	0.50	0.89
NL	0.11	0.75	0.00	0.00	0.50	1.00	0.50	0.26
NO	0.77	0.50	1.00	0.67	1.00	0.00	0.50	0.70
PT	0.31	0.25	0.33	0.33	1.00	0.00	0.00	0.32
SE	0.36	0.75	1.00	1.00	1.00	1.00	0.50	0.59
SI	0.49	0.75	0.33	0.33	1.00	0.00	0.00	0.45
SK	0.43	0.50	0.33	0.00	0.96	1.00	1.00	0.52

NB: Greece and Poland were excluded due to insufficient or inadequate data.

5.3.3.5 Comparative strengths and weaknesses across institutions

Across assessment criteria, **verification effort (B1)** and the **level of automation in processing (B2)** exhibit the higher average scores, indicating that while some countries achieve low scores (implying a low administrative workload) across these criteria (e.g. Belgium (RSVZ), Spain and Austria (ÖGK)), many countries are further from this lowest workload group (e.g. Bulgaria, Austria (SVS) and Sweden). This reflects two patterns that are evident from the underlying indicators. First, many institutions carry out substantive *ex ante* verification, which often extends beyond the declarations provided by applicants and involves checks against internal and external registers. Second, a significant share of national institutions report relatively low levels of robotisation and connectivity to the EESSI system, with most institutions requiring some level of manual intervention in the issuance of PD A1 certificates. It is also important to note that a factor driving patterns in the level of automation might be the volume of PD A1 certificates issued by the national institutions. For instance, high-volume institutions have more to gain from automating the application process, whereas the incentive is less for low-volume institutions, as it may be less resource-intensive to simply employ workers to manually process applications than to invest in automated systems. In part, this is reflected in the findings identified by this study, which sees a positive correlation between the levels of automation and the number of PD A1 certificates issued by the institution.

To improve performance in these criteria, institutions could concentrate *ex ante* checks on the items that materially support eligibility and shift low-risk elements to *ex post* control while relying on more automated checks. On the automation front, institutions should facilitate standard applications by reusing data from prior filings and registers, embed validations at each decision point and ensure that system outcomes are traceable through the application portal.

When looking at the **handling of changes (B3)**, the criterion records a relatively low average score, suggesting that many systems are closer to the best-performing institutions in terms of how they process notifications during the posting period. In this respect, most of the institutions observed use tool-based procedures and clear rules for determining whether changes trigger amended or new PD A1 certificates, with few notable exceptions such as Belgium (RSVZ and RSZ), Spain and Slovakia. When change-handling is integrated into the tool, the need for back-and-forth communication and re-assessment efforts is limited, whereas fragmented or offline processes increase the workload and, in turn, the level of administrative workload.

5.3.4. Comparative insights

The administrative workload scores for both applicants and national institutions demonstrate a wide range of values, yet the drivers of such workloads differ. On the applicant side, the average score for **portal usability and features (A3)** is the highest, indicating shared administrative effort across countries *ex ante* (e.g. authentication breadth, prefilled/reused data, tracking and bulk handling). In contrast, the results concerning the **information and evidence required (A1)** and application **process complexity (A2)** are more balanced among the national institutions observed. On the institutional side, the **effort involved in verification (B1)** and **automation in processing (B2)** are relatively higher on average, reflecting substantial *ex ante* checks and relatively low levels of automation. In contrast, **handling changes (B3)** scores are relatively low. Therefore, to reduce the workload on applicants most effectively, portal usability upgrades should be prioritised. Reducing the workload on institutions, however, depends more on calibrating what is checked and how it is automated.

On average, institutional workload scores are higher, suggesting that, in terms of verification scope and automation, many systems are further from the best-performing institutions than applicants are with regards to tasks such as access, submission and tracking. To better illustrate these differences, Table 19 introduces a 2×2 matrix (low/high applicant workload × low/high institutional workload) that sorts countries into four quadrants, with institutions grouped into each section on the basis of whether they were above the median value for administrative workload in each of the respective dimensions.

Table 19: Matrix displaying where each institution falls for the administrative workload scores for both applicants and institutions

Country	Low workload: institutions	High workload: institutions
Low workload: applicants	AT (ÖGK), BE (RSVZ), CY, ES, FI, FR, NL, SI.	AT (SVS), BE (RSZ), BG, CZ, EE, LT, NO.
High workload: applicants	DE (ABV), DE (DRB), DE (GKV), DK, HU, LU, PT.	HR, IE, IS, IT, LI, LV, SE, SK.

5.3.4.1 Low applicant and low institutional workload group

Countries in the low applicant and institutional workload group (Belgium (RSVZ), Spain, France, Cyprus, the Netherlands, Austria (ÖGK), Slovenia and Finland) perform better than average across most of the criteria used to calculate the scores for both applicant- and institution-facing workloads. On the applicant side, applicants typically need to submit fewer declaration items and complete fewer total data fields than the average institution, and institutions rely less on manual verification while using more automated checks and interoperable lookups, which implies reduced resubmissions and follow-up contacts. As mentioned before, while checking fewer elements might imply lower administrative workload for the applicants, it can also mean that compliance with posting conditions is checked less thoroughly, implying a trade-off in this regard.

These countries also score lower on **application process complexity (A2)**, indicating a largely online application process and fewer additional steps, which shortens the path to issuance for standard cases. Importantly, on access/authentication (Q10), these institutions tend to be close to the average but they perform well on user-friendly features (Q19) in particular, such as prefilled/reused data, status tracking, notifications and bulk submissions. On the institutional side, the administrative workload is significantly lower across all criteria: lighter **verification effort (B1)** through structured checks and register use, greater **automation in processing (B2)** that removes routine handling and more integrated **handling of changes (B3)**. Overall, this profile demonstrates a consistent approach of asking only what is necessary, relying on automated systems and supporting the workflow with features that avoid unnecessary back-and-forth between the applicant and the institution.

5.3.4.2 High applicant and high institutional workload group

Conversely, countries in the high applicant and institutional workload group (Croatia, Iceland, Ireland, Italy, Latvia, Lithuania, Slovakia and Sweden) perform worse than the average across most criteria. On the applicant side, applicants are typically required to submit more declaration items (A1) and complete more total data fields than the average institution, and institutions rely mostly on manual verification (B2) without using almost any automated checks or interoperable lookups (B2), which implies increased resubmissions and follow-up contacts. The largest gap relative to the sample average is on application process complexity (A2), indicating more steps, offline actions and burdensome processes for retroactive applications that lengthen the path to issuance. By contrast, these countries are closest to the average in portal usability and features (A3), suggesting that while access and in-portal functionality are below average, they are not the main reason this group's applicant workload is high. On the institutional side, these countries sit consistently above average in scope and verification (B1/B2), which means more items are checked *ex ante* and checks are more labour-intensive. In short, the profile of this quadrant reflects more complex application sequences for applicants and broader, more intensive verification for institutions, with limited automation of the workload.

5.3.4.3 High applicant and low institutional workload group

For institutions with high applicant and low institutional workload (Denmark, Germany (ABV, DRV and GKV), Luxembourg, Hungary and Portugal), the former is driven primarily by the information and evidence required (A1) – applicants are asked to provide a larger package of items and data fields, with more declarations and supporting documents than elsewhere, thereby signalling greater administrative workload and a higher score. By contrast, application process complexity (A2) and portal usability and features (A3) sit closer to the sample average, meaning the main pressure on applicants does not stem from the sequence of steps or tool design, but from the breadth of information that is expected up front. On the institutional side, countries perform strongly on verification effort (B1), resulting in a limited range of elements to be manually checked, and do slightly better on automation and change processing (B2/B3) than the average institution, relying more on structured procedures and automated routines that reduce internal workload. Together, this configuration keeps institutional effort low while shifting much of the work of compiling and supplying information to applicants.

5.3.4.4 Low applicant and high institutional workload group

Lastly, for national institutions with a low workload for applicants but a high workload for institutions (Austria (SVS), Belgium (RSZ), Bulgaria, Czechia, Estonia, Lithuania and Norway), applicants face lower-than-average **application process complexity (A2)** and stronger **portal usability and features (A3)**, while **information and evidence required (A1)** sits closer to the average. This means the information requirements are close to the average, but a well-equipped application portal with automated tools helps keep the applicant effort down. By contrast, institutions carry the load – **verification effort (B1)** and **process automation (B2)** drive the higher institutional workload. Specifically, more elements are checked before issuance and validation is more intensive, whereas **handling of changes (B3)** tends to be near the average, indicating that change notifications are processed in a relatively standard, routine way. Taken together, these systems keep applicant workload low through streamlined processes and automated systems, while institutional workload remains high because authorities undertake broader, more labour-intensive checks and validations.

In summary, the analysis reveals significant variation in administrative workload, with distinct drivers for applicants and institutions. The 2×2 matrix investigates how countries balance these factors: some allocate more effort to applicants, some to institutions and a few manage to keep both low. Priorities will differ by quadrant, but good practices from institutions with a low administrative workload have been identified. These include streamlining information requirements where feasible (A1, B1) while also strengthening in-tool functionality and automation (A3, B2). Together, these factors have the potential to reduce effort without compromising assurance.

6. Analysis of checks and anti-fraud measures

Key findings from this chapter

- The comparative analysis confirms that control mechanisms for PD A1 certificates are widespread but diverse across Member States. Most institutions conduct both *ex ante* and *ex post* verifications, with the former relying mainly on database cross-checks and the latter combining reactive and proactive measures. Likewise, the degree of automation varies significantly: while some institutions operate highly automated systems with integrated red flagging tools, others rely largely on manual checks. Hybrid models are also common, where automation supports but does not replace the discretion of caseworkers. Contestations and reassessments are relatively rare, but when they occur, they typically require cooperation between social security institutions, labour inspectorates and sometimes tax or judicial authorities, with broader investigations proving to be both time- and resource-intensive.
- Cross-border cooperation is anchored in the EESSI system, which has become the cornerstone of verification practices. Most national institutions rely on the EESSI system as the primary tool for exchanging information and systematically cross-checking data, though they often complement it with communication through the IMI system and direct exchanges (e.g. by email or phone), and manual verification. Country-level replies demonstrate increasing reliance on online verification portals, although their uneven availability creates asymmetries, while QR code verification remains limited to only a few Member States. The findings highlight substantial variation in the range of tools employed: some countries have developed layered systems that combine the EESSI system, direct exchange, portals and QR codes, while others adopt a minimalist approach. Importantly, reliance on EESSI notifications seems to reduce the perceived need for additional verification tools, but overall development remains uneven across Member States.
- In terms of anti-fraud measures, data matching with internal and external registers is the most common first-line tool, while advanced approaches such as risk assessment models, algorithms and scripts identifying suspicious patterns remain underused. Most institutions rate their measures as only moderately effective. Several institutions stressed that effectiveness is constrained by reliance on applicant-provided information and fragmented institutional responsibilities, though improvements have been made through enhanced coordination and cautious digitalisation. On the matter of statistics, very few Member States report fraud data, making it difficult to assess prevalence. Overall, fraud and error rates seem low, but this may be due to limited detection and monitoring rather than the true extent of the issue. Finally, the main causes of non-compliance in PD A1 applications relate to the failure to demonstrate substantial activity in the sending state, lack of prior affiliation, misclassification of employment status (false self-employment) and difficulties in applying criteria such as the replacement ban. While fraudulent practices such as untrue self-employment or fictitious companies exist, many irregularities stem from administrative mistakes or a lack of awareness, underscoring the complexity of the application of the grounds of assessment.

The analysis for Chapter 6 of this report will focus on **the checks**, **verification mechanisms and anti-fraud measures related to PD A1 issuance under Article 12**. Specifically, it will examine how national institutions ensure the accuracy and legitimacy of PD A1 certificates, both before and after they are issued. This includes understanding the methods used to verify documentation, the role of automation in these processes and the ways in which institutions detect and prevent fraudulent practices. By exploring these elements, the chapter intends to provide insights into how digital tools and established procedures contribute to effective control over PD A1 issuance across Member States and EEA countries.

At the same time, this chapter will also consider the **cross-border dimension of verification**, focusing on how (host) Member States assess the authenticity of PD A1 certificates issued by the sending countries. This includes the use of EU-wide systems like the EESSI system, national portals, direct exchanges between institutions and other verification tools, alongside traditional manual checks. In addition, attention will be given to **anti-fraud measures**, ranging from data matching and risk assessment models to algorithms and targeted cross-border exchanges. Understanding both the practices in place and their perceived effectiveness will in turn allow for a complete view of PD A1 controls, highlighting common approaches, emerging trends and innovative practices within the EU and the EEA.

6.1. Typology of control mechanisms

Key findings from this section

- The comparative analysis from Section 6.1 shows that control mechanisms for PD A1 certificates are widespread but highly diverse across the Member States observed. Most national institutions conduct both systematic *ex ante* and *ex post* verifications, with *ex ante* checks relying primarily on cross-referencing internal and external databases, while *ex post* measures combine reactive (contestation-driven) and proactive (random or risk-based) inspections.
- The degree of automation varies considerably: while some national institutions have highly automated systems integrated with national databases and supported by red flagging tools, others still rely on manual procedures to a large extent. Hybrid models are also common, where automated processes flag potential irregularities but caseworkers retain the discretion to conduct further checks. These differences reflect the range in national administrative capacity, priorities and case volumes, with more comprehensive systems often concentrated in countries facing higher levels of mobility or risk of fraud.
- Another central finding is that contestations and reassessments are considered relatively rare, but, when they occur, they often require cooperation between social security institutions, labour inspectorates and sometimes tax or judicial authorities. National institutions generally review the data underpinning the PD A1 certificate and may reinitiate the investigation process, occasionally leading to the amendment or withdrawal of the certificate. Broader investigations triggered by contestations or suspicions of fraud can be very time- and resource-intensive, particularly when cross-border cooperation is required.

It is important to clarify that this section mainly focuses on how institutions (cross-) check the information provided by the applicant, which is distinct from the analysis in the previous chapter. Chapter 5 examined how national institutions in the EU and the EEA implement the posting prerequisites established in the regulatory framework. It provided an empirical overview of current assessment practices, identifying which data elements are collected, at what stage (*ex ante* or *ex post*) and through which information sources. In contrast, Section 6.1. looks at verification practices, that is, how institutions confirm the authenticity and validity of the information once it has been submitted (by the applicant).

6.1.1. Timing of control mechanisms

The research data shows that the majority of institutions conduct *ex ante* verification of the information or documents submitted by the claimant in PD A1 applications. Among the national institutions reporting, 30 carry out *ex ante* timing of such checks, while only two national institutions (Iceland and Lithuania) explicitly reported that no such systematic procedures are in place. Likewise, the available data demonstrates that most institutions also carry out *ex post* controls on PD A1 certificates issued under Article 12. In total, 28 national institutions confirmed that they perform *ex post* checks on PD A1 certificates issued under Article 12, while only a small minority (Denmark, Hungary, Iceland and Ireland) reported not doing so, while Greece and Romania provided no applicable information. This shows that both *ex ante* verification and *ex post* verification are established practices across most of the countries under focus, reflecting the importance of monitoring compliance before and after PD A1 certificates have been issued.

6.1.2. Nature of control mechanisms related to applicants' declarations

Ex ante *verification methods*

The precise nature of these controls further reflects the diversity of administrative approaches across countries. Table 20 illustrates the range of ***ex ante* verification methods** used by national institutions when processing PD A1 applications. First, a clear majority relies on **cross-checking of information provided by the applicant with its internal (own) registers/databases**, with **29 out of 32 institutions** affirming their systematic use (excluding Belgium (RSVZ), Denmark and Germany (ABV)). The cross-checking of the information through **external databases** is also widely employed, albeit slightly less so, as **22 national institutions** reported using it. Only 10 national institutions (Denmark, Germany (ABV, DRV and GKV), Spain, Lithuania, Luxembourg, Austria (ÖGK), Portugal and Slovenia) responded they do not do so. These findings highlight that database checks form the backbone of *ex ante* verification, providing a relatively efficient and standardised means of cross-checking claimant information. By contrast, only two institutions (Denmark and Germany (ABV)) reported that they do not use internal or external databases to cross-check claimants' information, suggesting significant divergence in *ex ante* verification practices. Nonetheless, for Germany (ABV), this seems to be covered, as other German institutions (DRV and GKV)

reported that they rely on internal databases to carry out such cross-checks. The respondent from Germany (ABV) also noted that this is partly due to the relatively low case volume and low risk of fraud in this area. Additionally, it was highlighted that its assessment practices when issuing PD A1 applications for posting situations should not be overlooked (see Chapter 5).

Another common *ex ante* verification method is the **requesting of original or certified documents**, used by **15 institutions** (Bulgaria, Denmark, Ireland, Greece, Croatia, Italy, Cyprus, Latvia, Lithuania, Luxembourg, Austria (ÖGK, SVS), Poland, Slovenia and Sweden). Compared to databases, this method requires a greater administrative effort from both claimants and institutions. It is also clear that more specialised tools are less commonly applied. Moreover, **automated red flag systems** are used by **11 institutions** (Belgium (RSVZ, RSZ), Denmark, Germany (DRV, GKV), France, Luxembourg, the Netherlands, Austria (SVS), Poland and Finland), while **risk assessment tools** are used by only **four institutions** (notably in Belgium (RSVZ), France, Lithuania and Poland). Taken together, this shows that systematic risk profiling is still the exception rather than the norm. Finally, a small number of institutions report using **'other' methods**, such as **interviews (Cyprus)** or **case-by-case inspections (Ireland)**. Accordingly, these qualitative approaches add flexibility but also make processes less standardised.

Table 20: *Ex ante* verification methods

Methods	National institutions
Internal registers/databases	AT (ÖGK), AT (SVS), BE (RSZ), BG, CY, CZ, DE (DRV), DE (GKV), EE, EL, FI, FR, HR, HU, IE, IS, IT, LI, LT, LU, LV, NL, NO, PL, PT, SE, SI, SK.
External national registers/ databases	AT (SVS), BE (RSVZ), BE (RSZ), BG, CY, CZ, EE, EL, FI, FR, HR, HU, IE, IS, IT, LT, LV, NL, NO, PL, SE, SK.
Requesting original/certified documents	AT (ÖGK), AT (SVS), BG, CY, DK, EL, HR, IE, IT, LI, LU, LV, PL, SI, SE.
Automated red flag system	AT (SVS), BE (RSVZ), BE (RSZ), DE (DRV), DE (GKV), DK, FI, FR, LU, NL, PL.
Risk assessment tools	BE (RSVZ), FR, LI, PL.

Source: Author's own elaboration, based on surveys and interviews.

Looking at the data overall, they suggest that although most institutions prioritise database checks (both internal and external) as a baseline, there is significant variation in the additional tools applied. For instance, countries like Belgium, France and Poland employ a wide variety of tools for systematic *ex ante* verification, while others such as Germany (ABV) and Portugal adopt a minimal range of (*ex ante*) verification measures. Poland stands out as the only country employing the full range of methods – internal and external databases, certified documents, automated red flags and risk assessment – indicating a highly layered (*ex ante*) verification system. Of course, it should be acknowledged that the number of tools used does not provide a complete picture of the overall extent or depth of *ex ante* verification within a respective country.

Ex post *controls*

As for the **nature of *ex post* controls**, most countries combine **reactive and proactive measures**. Reactive controls (e.g. triggered by PD A1 contestation through irregularities or suspected fraud) are the baseline and are reported by nearly all participating institutions. Only four national institutions (Czechia, Denmark, Hungary and Iceland) did not report using reactive (*ex post*) checks. In contrast, proactive controls, which involve random checks and risk-based targeting, are also present in many countries. Specifically, 17 national institutions (Austria (SVS), Bulgaria, Croatia, Cyprus, Estonia, Finland, Germany (ABV), Latvia, Liechtenstein, Luxembourg, the Netherlands, Norway, Poland, Portugal, Slovakia, Slovenia and Spain) report using them. Notably, these 17 institutions have integrated both reactive and proactive approaches within their *ex post* checks. By contrast, 10 national institutions (Belgium (RSVZ, RSZ), Germany (GKV), Ireland, Greece, France, Italy, Lithuania, Austria (ÖGK) and Sweden) appear to rely exclusively on reactive measures. However, it should again be emphasised that this does not provide any insight into the assessment practices of national institutions when issuing PD A1 applications in posting situations, as discussed in Chapter 5.

This range of approaches points to a divergence in regulatory practices across countries. For example, **Bulgaria, Spain, France and Finland** have institutionalised both proactive and reactive measures, which may point to stronger and broader enforcement capacity. By contrast, countries such as **Ireland** and **Italy**, which rely solely on reactive checks, may be less equipped to detect systemic risks unless irregularities are reported or otherwise brought to their attention.

A crucial element of the nature of this *ex post* phase is the **reaction to contestation and what steps are taken to reassess the PD A1 certificate based on the contestation received**. The result of the comparative analysis highlights some noteworthy observations.

First, several countries reported that contestations are **relatively rare events** (Austria (SVS), Finland, Germany (DRV), Ireland and Norway). For instance, **Austria (SVS)** explained that withdrawal of PD A1 certificates is more frequent under multi-state work (Article 13 of Regulation (EC) No 883/2004). **Finland** similarly noted that such cases are unusual but, when they arise, applications are manually reassessed. Furthermore, **Norway** also stated that contestations are infrequent, citing only a handful of cases before 2020, where administrative reviews confirmed the validity of the original decisions.

Second, most national institutions (Belgium (RSVZ, RSZ), Bulgaria, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany (GKV), Ireland, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Norway, Poland, Portugal, Slovakia, Slovenia, Spain and Sweden) **review the (often automatically filled-in) data that led to the issuance of the PD A1 certificate**, and (re)initiate the investigation process as needed. For instance, **Denmark** noted that it will reassess the PD A1 certificate and, if a mistake or issue is identified on the Danish side, it will either correct the certificate or proceed with its withdrawal. Similarly, **Estonia** stated that it will re-analyse the application and, if needed, will issue a new PD A1 certificate or revoke it. Also, **Bulgaria** reported that action is taken to review the conditions of the PD A1 certificate.

Additionally, several national institutions reported that this reassessment after contestation frequently occurs in cooperation with (national) **labour inspectorates** (e.g. Belgium (RSVZ), Ireland, Spain, Italy, Cyprus, Latvia and Slovenia). For instance, **Slovenia** noted that it notifies the labour inspectorate, which should initiate inspection proceedings. **Latvia** similarly reported that, if necessary, it asks the state labour inspectorate to carry out the inspection at the workplace in order to establish if an economic activity is ongoing. **Cyprus** equally pointed to the involvement of the labour inspectorate in view of inspections. **Italy** also indicated that reassessments are carried out after the completion of inspections, which may be conducted by internal inspectors in cooperation with the labour inspectorate services.

Moreover, **many institutions emphasised the central role of international cooperation in resolving contestations** (e.g. Estonia, Ireland, Luxembourg, the Netherlands, Norway and Slovakia). For example, **Ireland** noted that it responds to the Member State raising the contestation by explaining how the information provided was taken into account in the review and clarifying whether there are grounds to reissue, amend or withdraw the original certificate. Additionally, a query from a trade union representative triggered an investigation that revealed that several PD A1 documents in the construction sector were fraudulent. Further checks showed that significantly more PD A1 certificates had been issued for Sweden compared to neighbouring Nordic countries, and verification confirmed a broader pattern of false documents linked to a business model for exporting scaffolding workers. **Luxembourg** also described re-examining files and liaising with other authorities via the EESSI system or the IMI system to confirm or withdraw a certificate. **Estonia** distinguished between contestations from foreign institutions, which lead to re-analysis, and those from applicants, which follow national administrative appeal procedures. Interestingly, the **Netherlands** also emphasised the growing role of ELA in facilitating joint inspections. However, these have been used sparingly to date due to their considerable cost and time requirements.

Fourth, some institutions stressed their reliance on **systematic internal verification supported by automation, complemented by manual reassessment (which can include on-site inspections) when challenged**. For instance, **Belgium (RSVZ)** underlined that contestations are usually raised by other Member States via the EESSI system or email, prompting file managers to review and, if justified, amend, cancel or withdraw the PD A1 certificate. However, it stressed that it does not conduct fresh investigations after issuance unless new evidence arises, since its system is designed with extensive preliminary checks. **Belgium (RSZ)** provided another detailed example: when problems arise in connection with outbound postings, the inspectorate often collaborates with ELA for on-site inspections. In some instances, such as with Luxembourg, reports from local inspectorates (e.g. noting that a declared business address is only a PO box) are forwarded to them, thereby prompting a review of their previous PD A1 application decision. However, it does state that corroborating the findings can be challenging, as Belgian courts tend to give weight to the statements of the individual rather than foreign inspection reports. Also, **France** reported that the first step consists of carrying out checks within its information system, followed by document-based verifications. Finally, if necessary, on-site investigations are entrusted to the regionally competent office that manages the company's account. Similarly, **Finland** highlighted that these kinds of contestations are highly rare due to its high automation rate, but if concerns are raised, it will investigate the matter and manually re-evaluate the issuance of the PD A1 certificate.

Fifth, several institutions pointed to the existence of **formalised or standardised investigation procedures** in this area. For instance, **Poland** has created a specialised verification unit in Siedlce dedicated to handling such cases, ensuring uniformity of response. Another example is **Lithuania**, which requires claims to be processed by the SODRA board as a mandatory pre-court step, with substantiated claims sent back for re-evaluation and rejected claims closed unless appealed further. **Sweden** noted that the PD A1 certificate is an official administrative act in itself, and that it is always possible to appeal this decision. The PD A1 document also contains information on the applicable appeal procedure.

Finally, some national institutions (e.g. Spain, the Netherlands and Slovakia) described these broader investigations as **very time- and resource-intensive**, especially when patterns of (cross-border) fraud emerge. For instance, the **Netherlands** stated that if the case involves a PD A1 certificate issued abroad (i.e. the Netherlands as the host Member State), the

situation can become quite complex. Outcomes depend heavily on the country involved and the cooperation levels. For instance, it was mentioned that while collaboration with Belgium is efficient, responses from southern and eastern Europe can take considerably more time. **Spain** also noted that these investigations often involve large or complex companies.

6.1.3. Degree of automation

One key objective of this report was to assess the degree of automation (ranging from fully automated with minimal human involvement to completely manual) in *ex ante* verification methods, and to determine the role and impact of digitalisation in these processes.

In this context, the results from the comparative analysis reveal that the degree of automation in cross-checking claimant information against internal or external registers varies widely across institutions. A majority of countries lean towards **manual or limited automation**: out of 29 reporting institutions, **15 countries** (Austria (SVS), Bulgaria, Croatia, Cyprus, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Norway, Poland and Sweden) stated that their processes are not automated at all, while **two national institutions** (Czechia and Estonia) reported that their system only permits limited automation (i.e. significant human intervention is still required, with some automated processes in place). This suggests that in many systems, verification still relies heavily on staff intervention, with limited use of digital integration. By contrast, **three institutions** (Portugal, Slovenia and Slovakia) reported a **moderate level of automation** (i.e. some human intervention required), while another **nine national institutions** (Belgium (RSVZ, RSZ), Germany (DRV, GKV), France, Luxembourg, the Netherlands, Austria (ÖGK) and Finland) indicated that their system has achieved a **high level of automation** (i.e. little to no human intervention required).

Table 21: Degree of automation

Methods	National institutions
Manual processes	AT (SVS), BG, CY, EL, HR, HU, IE, IS, IT, LI, LT, LV, NO, PL, SE.
Limited automation	CZ, EE.
Moderate automation	PT, SI, SK.
High automation	AT (ÖGK), BE (RSVZ), BE (RSZ), DE (DRV), DE (GKV), FI, FR, LU, NL.

Source: Author's own elaboration, based on surveys and interviews.

These findings show that while some systems are moving towards fully automated cross-checks (i.e. 9 out of 28 reporting national institutions), there is still substantial variation in the degree of automation across Member States, with most institutions still relying on manual or only partially automated verification processes.

This relationship may also be partly explained by the relatively low volume of PD A1 applications in some countries, which diminishes the incentive to invest in (fully) automated systems. The observed correlation is further supported by comparing current data on the degree of automation in cross-checking claimant information against internal or external registers with data on the number of PD A1 certificates each Member State issues (based on the data from the PD A1 statistical report ([19]) on PD A1 certificates issued in 2023). This comparison appears to confirm the association between lower levels of automation and (relatively) lower volumes of PD A1 certificates, and vice versa.

Institutions with high levels of automation tend to be among the (relatively) higher tiers of the number of PD A1 certificates issued (e.g. Belgium, Germany, France, Luxembourg and the Netherlands). For instance, Germany, the largest PD A1 issuer, is among the countries reporting a high level of automation. Notably, there are exceptions, such as Italy and Poland, which maintain relatively high issuance volumes despite relying heavily on manual processes. Conversely, countries relying predominantly on manual processes generally issue fewer PD A1 certificates, suggesting that lower automation levels limit the capacity to efficiently process large volumes of applications. For example, Cyprus, Greece, Iceland, Ireland, Liechtenstein, Norway and Sweden each issued fewer than 10 000 PD A1 certificates (in 2023), placing them in the lowest tier of number of PD A1 certificates issued. At the same time, all of these countries report relying primarily on manual processes. Overall, the analysis suggests a general but not absolute trend: higher PD A1 issuance is associated with greater automation, reflecting the fact that large-scale administrative workload may incentivise investments in (automated) digital solutions.

([19]) European Commission: Directorate-General for Employment, Social Affairs and Inclusion, De Wispelaere, F., De Smedt, L. and Pacelot, J., *Posting of Workers: Report on A1 Portable Documents issued in 2023*, Publications Office of the European Union, Luxembourg, 2025, https://data.europa.eu/doi/10.2767/4389721.

These results are further corroborated by the country-level examples provided, particularly in the context of automated red flag systems and risk assessment tools.

A first group of national institutions highlighted that their **highly automated systems integrate with national databases and issue certificates with minimal human intervention, while still allowing manual review of flagged cases**. For instance, **Belgium (RSZ)** explained that over 80 % of its decisions are now fully automated via its portal, with applications checked against employer declarations and existing data (e.g. Dimona registrations). If information is provided accurately and the relevant countries are indicated, the system makes the decision automatically. In the institution's experience, this high level of automation allows it to manage increasing volumes of applications with a relatively small team. **France** reported a similar model, where 88 % of certificates were issued automatically in 2024 while retaining the ability to block applications when a company is suspected of fraud. Likewise, **Luxembourg** described how algorithms flag risks such as undeclared pluri-activity, missing affiliation or inconsistent dates, with all flagged applications being reviewed before any PD A1 certificate is issued. Similarly, **Germany (DRV)** reported that in its automated process, the answers provided in the electronic PD A1 application are checked through a verification logic. **Poland** noted that it has incorporated basic red flagging within its electronic application system, where incomplete or incorrect information is automatically highlighted for correction before submission. Moreover, **Denmark** highlighted that its automated red flag system is integrated into the back-end engine of the application portal, flagging applications that raise concerns, such as overlapping posting periods or inconsistencies in employer registration data. The system also monitors employers with a history of incorrect or suspicious applications, which then may be flagged for enhanced scrutiny. Once flagged, any future applications from that employer will be reviewed more carefully.

A second group of national institutions pointed attention to the constant **balance between automation and human judgement**, **where automated red flags are combined with (discretionary) checks by caseworkers**. For instance, **Finland** explained that certain employers are excluded from automatic processing to ensure that, for example, seafarers and flight crew personnel are not processed automatically. In addition, other employers with significant ongoing investigations can also be added to this exclusion list. Similarly, **Belgium (RSVZ)** highlighted that while its portal processes all PD A1 applications and flags repeated applications for manual review, inbound PD A1 certificates are scrutinised more closely by the fair competition service through extensive data matching. The **RSZ** similarly conducts a manual check when the system identifies insufficient information or potential issues. Complex or exceptional cases (e.g. overlapping postings, double employment or situations where legislation is unclear) are handled manually to ensure that no double PD A1 certificates are issued, that applications are properly submitted and that employers with higher fraud risk are appropriately monitored. **Denmark** also reported that, in addition to automated flags, human caseworkers conduct cross-checks. If any inconsistencies or gaps are identified, the caseworker may request additional documents, including original or certified copies. It was also stressed that these actions are discretionary and not limited to flagged applications, as caseworkers may initiate further verification based on their own judgement even if no automated red flags are triggered. **The Netherlands** explained a labelling system that is applied mainly to employers, where alerts may indicate misconduct or simple errors, and flagged applications receive the same treatment as other high-priority cases. In other words, when an online application contains information that conflicts with existing data in its system, the case is automatically flagged for manual handling. **Germany (GKV)** similarly reported that, as much as possible, the information provided in the application is checked for plausibility against existing background data, and in cases of discrepancies or red flags, it is then forwarded to a case handler for manual review and a decision.

Finally, some national institutions stressed **more limited or manual approaches, often due to lower case volumes or reliance on traditional verification practices**. For instance, **Ireland** noted that it engages on-site inspectors from within the department or, when circumstances merit, initiate a multi-agency inspection if concerns arise. Although there is no automation, officers still conduct their own evaluations to ensure proper review of applications. Similarly, **Italy** reported that it performs all checks manually, including *ex ante* verifications, using internal databases such as workers' contribution records and self-employed registrations, along with external registers like revenue agency data for turnover checks, chamber of commerce records and the ministry of labour's employment notifications. Finally, **Liechtenstein** highlighted that fraud appears to be rare. In cases of doubt regarding the validity of a PD A1 certificate, the institution contacts the issuing sister administration to verify its authenticity.

In conclusion, the comparative analysis presents a nuanced picture of the degree of automation. Verification methods across countries are marked by wide variation in automation, ranging from advanced digitalised checks to (almost) entirely manual processes. Most institutions rely heavily on internal and external databases, but many still process applications manually or with only limited automation. A smaller group of countries, such as Belgium and Poland, has developed highly automated systems. Hybrid models are also common, combining automated red flags with discretionary checks by caseworkers to balance efficiency with nuanced judgement. Overall, while digitalisation has significantly improved efficiency in some systems, a substantial share of institutions still operate with minimal automation, highlighting uneven capacities/priorities across the EU.

These findings are also consistent with earlier research that has been carried out on the same topic. For instance, the 2025 **ELA report *National cross-border digital tools and services in the field of EU social security coordination*** ([20]) concluded that digital transformation in fraud and error detection for PD A1 and social security coordination have been partial, with significant variation across Member States. While only a few countries have implemented advanced solutions such as AI-driven data mining and machine learning, most rely on more passive digital tools, including back-end checks with internal or cross-border registers and online user updates. Overall, the report states that digitalisation (through data matching, online platforms and automated processes) can enhance the accuracy and comprehensiveness of case evaluations, reduce errors and delays and better target inspections.

6.1.4. Types of control bodies

When looking at **who performs (*ex post*) controls**, a variety of institutional responsibilities can be observed. In most cases, it is clear that **social security officials** play a central role, sometimes within specialised units focusing on PD A1 certificates (Austria (ÖGK), Belgium (RSVZ, RSZ), Croatia, Cyprus, Czechia, Estonia, France, Germany (DRV, GKV), Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, the Netherlands, Norway, Poland, Portugal, Slovakia, Slovenia, Spain and Sweden). Several countries also involve **labour inspectorates** during *ex post* checks (Belgium (RSVZ, RSZ), Bulgaria, Croatia, Cyprus, Ireland, Italy, Latvia, Liechtenstein, Slovakia, Slovenia and Spain), most often in cooperation with social security institutions. Finally, **tax and customs (enforcement) authorities** are another key participant in this area in many countries (Bulgaria, Estonia, Austria (ÖGK) and Slovenia). In two countries (Germany (GKV) and Slovenia) in particular, health insurance institutions are also explicitly mentioned as participants with an active role in performing *ex post* controls.

This demonstrates that *ex post* verification is often shared across different bodies, depending on national administrative structures and enforcement traditions. Additionally, it highlights the importance of **interinstitutional collaboration** in this area. For example, the **Dutch SVB** noted increasing cooperation between it and the labour inspectorate. It has also developed partnerships with the employee insurance administration and the tax authorities, enabling more joint investigations and more efficient data sharing, since the same subjects are often involved, albeit from different regulatory perspectives.

These findings are also in line with past research on the topic. For example, the 2025 **ELA report, *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis***, confirmed that across the EU, social security institutions are the main players in detecting fraud and error, with some countries establishing specialised units that may work independently or in collaboration with labour inspectorates ([21]). Also in this report, it is highlighted that tax authorities, customs offices and law enforcement agencies play a role, particularly in addressing undeclared work, tax evasion and complex fraud schemes affecting social security systems. It is explained that cooperation between these different institutions occurs through both formal mechanisms, such as partnership agreements enabling data exchange, and informal arrangements developed over time, though such collaboration is often fragmented and case-specific.

The latter is also explicitly acknowledged in the **2025 Commission report, *Fraud and error in the field of EU social security coordination***, where one of the main conclusions is that Member States increasingly see the value of engaging other authorities outside the social security framework, such as labour inspectorates, tax authorities and judicial bodies, reflecting the apparent need for an interinstitutional approach ([22]). The 2025 **ELA report *Fraud and error and selected issues in the field of social security coordination*** – *ELA strategic analysis* equally sheds light on the fact that improved collaboration and data sharing has the potential to promote informed decision-making on applications while reducing the likelihood of fraudulent cases (or unintentional error).

([20]) ELA, *National cross-border digital tools and services in the field of EU social security coordination*, Publications Office of the European Union, Luxembourg, 2025, https://www.ela.europa.eu/en/publications/national-cross-border-digital-tools-and-services-field-eu-social-security-coordination.

([21]) ELA, *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis*, Publications Office of the European Union, Luxembourg, 2025, https://www.ela.europa.eu/sites/default/files/2025-03/SSC_final_report_20250317_cover.pdf.

([22]) European Commission: Directorate-General for Employment, Social Affairs and Inclusion and Jorens, Y., *Fraud and error in the field of EU social security coordination – Reference year 2023*, Publications Office of the European Union, Luxembourg, 2025, https://data.europa.eu/doi/10.2767/1063462.

6.2. Cross-border cooperation tools

Key findings from this section

- The analysis presented in this section shows that the EESSI system has become the cornerstone of cross-border verification practices, with the majority of national institutions relying on it to exchange information on PD A1 certificates. The EESSI system is generally considered the most reliable and efficient channel, enabling quick detection of irregularities and systematic cross-checks with national databases. Nevertheless, most institutions combine this system with other mechanisms, particularly direct exchanges of information (via the IMI system, secure email or phone) and manual verification through official channels. Country-level replies also highlighted a growing use of online verification portals, which allow instant confirmation of authenticity where available, although their uneven adoption creates significant asymmetries. By contrast, QR code verification is only used in a handful of countries, and no institution has yet integrated automated interoperability between national registers into its system.
- At the same time, the findings highlight considerable diversity in the range and depth of tools employed across Member States. Some countries have developed broad and layered systems that combine the EESSI system, direct exchange, portals and QR codes, while others adopt a more minimal approach, relying mainly on a single tool. A larger group of Member States uses a limited set of three to four tools, reflecting a balanced but not fully integrated approach to verification. Importantly, the perceived need for additional verification tools appears closely linked to reliance on EESSI notifications: the fact that Member States declare PD A1 issuance directly through the EESSI system may reduce the necessity of further verification measures. Overall, the comparison highlights uneven levels of development and integration, with Member States progressing at different speeds towards more digitalised and comprehensive systems.

This section analyses the role of several types of cross-border cooperation tools aimed at supporting the prevention and tackling of fraud and error in this area. In this context, the 2025 ELA report *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis* already mentioned that the key challenge in detecting and tackling cross-border fraud and error is 'insufficient cooperation'. According to the report, this includes 'the lack of timely exchange of information between countries' which is caused by a 'variety of factors related to institutional processes, human resources and the unavailability of automated cross-border data exchange'. These challenges are also reflected in the verification practices for PD A1 documents issued in other Member States, where significant differences are apparent.

Electronic exchange of social security information system

A review of the available data shows significant differences in verification methods for PD A1 documents across Member States. First, it is apparent that national institutions rely heavily on the **EESSI system**. Other sources also indicated how one of the key measures to improve fraud and error detection is shifting towards digital platforms that facilitate quicker and more reliable data exchange, as is the case with the EESSI system that enables faster verification of claims across borders ([23]). Only a few national institutions did not explicitly report using the EESSI system to verify the authenticity or validity of PD A1 certificates (Croatia, Denmark, Germany (GKV), Ireland, Liechtenstein and Lithuania). The number of national institutions reporting in this manner may be influenced by differences in interpretation, as some institutions may not view the method as an explicit means of verifying authenticity or validity. Furthermore, some enforcement authorities (e.g. labour inspectorates) lack direct access to the EESSI system, limiting their ability to use EESSI data for verifying PD A1 certificates.

The country-level responses illustrated well how national institutions approach the benefits of the EESSI system in practice. For instance, **Belgium (RSVZ)** reported that all PD A1 documents are tracked systematically. If the PD A1 issuance has not led to an EESSI notification, it is deemed irregular and, in such cases, it initiates inquiries abroad. Moreover, all incoming data through the EESSI system is subject to automatic checks. For example, if Poland determines that an individual is a wage earner under Belgian law, it verifies whether that individual has a Dimona declaration. If not, the case is flagged for manual review. Similarly, the **Belgian RSZ** described that in cases where it discovers that a foreign country has made an incorrect decision, the matter is referred to a file manager, who may contact the foreign country via the EESSI system to raise the issue. Likewise, the **German DRV** explained that PD A1 certificates are compared with the notification from the foreign institution via the EESSI system. Interestingly, **France** reported that it has created a database called the Applicable Social Security Legislation Control, which contains all EESSI mobility notifications issued by Member States to France (for more information, see Section 6.4).

([23]) ELA, *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis*, Publications Office of the European Union, Luxembourg, 2025, https://www.ela.europa.eu/sites/default/files/2025-03/SSC_final_report_20250317_cover.pdf.

Direct exchange of information

Another key observation concerns the heavy reliance on **communication through the IMI system** and **direct exchange of information (e.g. by email or phone)** by the reporting entities. Out of the 28 national institutions, 20 reported using these means of information with the issuing institution in the sending Member State as a tool to verify the authenticity of PD A1 documents. This makes it the **second most common practice**, although it is often combined with other mechanisms. Similarly, **manual verification through official channels** (e.g. through secure email, administrative cooperation platforms) also remains a widely used practice (as in the case of Belgium (RSVZ), Cyprus, Czechia, Estonia, Finland, Greece, Iceland, Ireland, Latvia, Lithuania, Luxembourg, the Netherlands, Poland, Portugal, Slovakia Spain and Sweden), representing a primary method of verifying authenticity for many national institutions and reflecting its continued importance in the absence of other digitalised and/or automated solutions.

Again, the country-level findings offer valuable insight into the ways national institutions handle the direct exchange of information and manual verification through official channels in practice. For example, **Latvia** noted that through the IMI system on prior notification, the employer is under an obligation to specify their possession of a PD A1 document. The **Dutch SVB** described a dual approach: while the EESSI system is used for individual-level cases, broader or structural investigations are often pursued through email contacts or even letters, sometimes resulting in faster responses than formal procedures. At the same time, the Dutch experience also shows the drawbacks of such reliance, as effectiveness depends heavily on the willingness and priorities of the contacted (foreign) authority. Similarly, the **Belgian RSZ** highlighted that while the EESSI system is the primary channel, it is not the only one, as countries may also contact the institution via email or phone. For large-scale issues, meetings can be arranged, and cooperation with neighbouring countries such as France and Luxembourg has been reinforced through both formal and informal channels, particularly since the implementation of the EESSI system. Likewise, **Finland** highlighted that it had recently established a direct data exchange agreement with Estonia. In addition, manual verification via official channels has been secured, including email contacts with key Member States such as Estonia and Sweden, to confirm, among other things, whether a PD A1 certificate is valid and in force. **France** stressed that it does not base its investigations solely on the existence of the PD A1 certificate. In its view, it is essential to carry out additional investigations into the existence of the sending company, the declaration of workers and any other relevant information. In those instances, it contacts the institution of the state of employment (Article 12).

QR codes

QR code verification by comparison is reported in far fewer cases, showing adoption in only three different Member States (France, Croatia and Slovenia). For instance, the German DRV pointed out that certain countries, such as **Croatia**, provide their A1 certificates with a unique serial number and a QR code to enable online verification of the PD A1 certificate. Nonetheless, in general, this uneven uptake suggests that QR codes have not yet achieved the same level of institutional integration as the EESSI system, IMI system communication or direct exchanges. The same is true when it comes to **accessing the social security register of the issuing Member State**, with no national institution reporting that this is the case. Similarly, no institution indicated that **automated interinstitutional exchange tools** have been integrated into its national systems. Taken together, these observations suggest that direct interoperability between national registers is not yet within reach, and that both trust and technical alignment among Member States remain significant challenges.

Online portals

With respect to **online (verification) portals**, a distinction should be made between Member States that have established their own dedicated portals and those that indicated reliance on the online portals of (other) Member States to verify PD A1 documents issued abroad. In the former category, four national institutions (Norway, Poland, Portugal and Spain) explicitly reported having online verification portals integrated within their systems. In the latter category, almost half of the reporting institutions (Belgium (RSVZ, RSZ), Germany (DRV), Estonia, Ireland, Greece, Croatia, Cyprus, Latvia, Lithuania, the Netherlands, Poland, Portugal, Slovakia and Sweden) indicated that they make use of online verification portals, where available, to validate PD A1 documents issued by other Member States.

For instance, the **German DRV** noted that countries, such as Poland, provide access to their internal databases via an online portal, where the authenticity and validity of PD A1 certificates (which are provided with a unique serial number) can be verified. Similarly, Ireland reported that when a certificate issued by another Member State is presented in Ireland, any doubts as to its authenticity are resolved by checking the relevant information through the issuing country's online verification portal, where such a portal is available. Sweden also pointed to its usage of other countries' online portals to verify the authenticity of PD A1 documents issued in those Member States.

These examples demonstrate that digital verification portals are considered key elements for ensuring the authenticity of PD A1 certificates issued in another Member State. On the other hand, their uneven availability creates asymmetry in how quickly and effectively Member States can confirm authenticity.

Finally, the **Dutch SVB** repeatedly highlighted the benefits of including ELA in cross-border cooperation between Member States. ELA offers support by facilitating joint inspections and providing its mediation services as a mechanism to resolve disputes between Member States.

Table 22: Cross-border cooperation tools

Methods	National institutions
EESSI	AT (ÖGK), AT (SVS), BE (RSVZ), BE (RSZ), BG, CY, CZ, DE (ABV), DE (DRV), EE, EL, ES, FI, FR, HU, IS, IT, LU, LV, NL, NO, PL, PT, SE, SI, SK.
Online verification portal ([24])	ES, NO, PL, PT.
IMI or direct exchange (e.g. through email contact)	BE (RSVZ), BE (RSZ), CY, CZ, EE, EL, ES, FI, HR, IE, IS, IT, LI, LU, LV, PL, PT, SE, SI, SK.
QR code verification ([25])	FR, HR, SI.
Manual verification via official channels (e.g. secure email, administrative cooperation platforms)	BE (RSVZ), CY, CZ, EE, EL, ES, FI, IE, IS, LT, LU, LV, NL, PL, PT, SE, SK.

Source: Author's own elaboration, based on surveys and interviews.

Evaluation of tools

The comparison overall highlights differing development speeds among Member States. Although the analysis reveals a **shared reliance on the EESSI system as a baseline**, there is significant diversity in how further verification measures are operationalised. Countries like Belgium and Portugal adopt a broad range of tools, reflecting advanced and complex layered verification systems. In contrast, some countries adopt a more minimal approach by relying on only a single tool (e.g. Austria (ÖGK, SVS), Germany (ABV), France, Hungary, Latvia and Norway). Between these extremes, a large group of countries (e.g. Croatia, Cyprus, Czechia, Estonia, Finland, Germany (DRV), Greece, Iceland, Ireland, Luxembourg, the Netherlands, Poland, Slovakia, Spain and Sweden) adopts three to four tools, suggesting a balanced yet not fully integrated approach.

Importantly, this variation may also indicate that the perceived need for additional verification measures is influenced by the extent to which Member States already rely on EESSI notifications. In this respect, a comment from **Luxembourg** was particularly telling as it explicitly notes that most Member States declare PD A1 issuance directly through the EESSI system, which reduces the need for further verification and highlights how the baseline usage of the EESSI system diminishes the relative importance of other verification measures.

Nonetheless, while the EESSI system is designed to facilitate quicker and more reliable data exchange, the reality is considerably more nuanced.

First, in principle, enforcement authorities should be able to verify the authenticity and validity of PD A1 documents using the data available through the EESSI system. In practice, however, **many enforcement authorities (e.g. labour inspectorates) lack direct access to the EESSI system** and therefore cannot rely on its data to verify the authenticity and validity of PD A1 documents. Some countries, such as France, have established national portals that facilitate the sharing of EESSI data with enforcement authorities (see Box 14). In contrast, the absence of such mechanisms in other Member States represents a substantial barrier to effective verification.

Second, this limitation is further exacerbated by **data protection regulations**, which can constrain or complicate the exchange of information between social security institutions and enforcement authorities.

Third, Member States generally report that the EESSI system has significantly improved the speed and reliability of cross-border information exchanges. Nonetheless, it is important to be aware of certain potential issues that may affect the quality and reliability of the system, as identified in the literature ([26]). For instance, manual data entry via EESSI national applications instead of automated transfers can lead to **delays, slowness and errors**, undermining the speed and accuracy of cross-border exchanges. **Data mismatches and incomplete or missing posting notifications or responses** between

([24]) Only those Member States which have indicated that they have in place such online portals in their respective systems.
([25]) Only those Member States which have indicated that they equip their PD A1 forms with a QR code.
([26]) ELA, *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis*, Publications Office of the European Union, Luxembourg, 2025, https://www.ela.europa.eu/sites/default/files/2025-03/SSC_final_report_20250317_cover.pdf; ELA, *National cross-border digital tools and services in the field of EU social security coordination*, Publications Office of the European Union, Luxembourg, 2025, https://www.ela.europa.eu/en/publications/national-cross-border-digital-tools-and-services-field-eu-social-security-coordination.

institutions were flagged, highlighting the need for closer monitoring of information quality, timeliness and traceability. For instance, one example of where such monitoring could be applied concerns the mismatch between the number of PD A1 certificates issued and the notifications made in relation to the corresponding business use cases. In this context, the Administrative Commission also noted that the quality and reliability of the EESSI system are being **actively monitored**, including mismatches between declared PD A1 certificates and system records ([27]).

6.3. Anti-fraud measures

Key findings from this section

- The comparative analysis carried out in this section shows that data matching with internal and external registers is the most widely used anti-fraud tool as a first-line defence against irregularities in PD A1 applications. By contrast, more advanced techniques such as risk assessment models, algorithms and scripts identifying suspicious patterns are used far less frequently, with only a handful of institutions reporting to apply them. Overall, the findings reveal a tiered outcome: a small number of countries use multiple complementary tools, some rely on one or two measures and many depend exclusively on data matching or no specific fraud-prevention techniques at all.
- When evaluating the effectiveness of these measures, most institutions described their systems as only moderately effective. Only Cyprus reported its measures as very effective, which may reflect the use of a broader toolkit combined with a relatively small number of postings, allowing for closer scrutiny. Many institutions underlined that the measures' effectiveness depends heavily on the accuracy and honesty of information provided by applicants, while others pointed to weaknesses linked to divided institutional responsibilities or lacking integration with inspectorates and tax authorities. Some institutions, however, highlighted improvements through enhanced interinstitutional coordination, aggregation of data sources and cautious adoption of digital tools such as automated alerts and scripts, which support but do not replace human review.
- On the availability of statistics, the general absence of consistent reporting makes it difficult to establish a reliable understanding of the prevalence and patterns of fraud in PD A1 applications. This lack of quantitative evidence may suggest that the true scale of fraud may be underestimated, reflecting detection and monitoring limitations rather than low incidence rates. Finally, on the main causes of non-compliance, the most frequently reported issue is the failure to demonstrate substantial activity in the sending state, often linked to insufficient turnover or recently established companies. Other recurring problems include the lack of prior affiliation, the misclassification of employment status (false self-employment under Article 12(2)) and difficulties applying criteria such as the replacement ban or direct relationship. While cases of fraud that involve fictitious companies, false self-employment or letterbox companies do exist, many irregularities are also caused by administrative errors or a general lack of awareness among applicants, highlighting the complexity of certain legal criteria**.**

6.3.1. Types of anti-fraud measures

The 2025 ELA report *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis* highlights that a wide range of methods and tools are used to detect and tackle fraud and error. This includes monitoring activities, risk assessments, inspections, data mining and matching, automated checks, systematic data exchange and awareness-raising among companies and mobile citizens. The report notes that these approaches often complement one another, with monitoring and data analysis shaping inspection priorities, while digital tools such as AI, machine learning and data mining improve targeting efficiency and the use of resources.

In order to understand how national institutions actively combat fraud, responding entities were asked to identify which specific techniques are employed from a list that included data matching, risk assessment models, algorithms, targeted cross-border data exchange and scripts identifying suspicious patterns. The data collected for this report also indicate that Member States use a wide array of specific anti-fraud measures in the context of Article 12 PD A1 applications. Nonetheless, the results show considerable variation in the practices applied by different institutions.

([27]) For example, Administrative Commission for the Coordination of Social Security Systems, 'Summary of the minutes of the 380th meeting of the Administrative Commission', AC 174/24, 16–17 October 2024, https://webgate.ec.europa.eu/circabc-ewpp/ui/group/bab664d7-1188-47b2-9fa6-869902320ba2/library/e1b7c8a6-e8a2-4b27-8aef-4307d7c13309/details; Administrative Commission for the Coordination of Social Security Systems, 'Summary of the minutes of the 379th meeting of the Administrative Commission', AC 092/24, 26–27 June 2024, https://webgate.ec.europa.eu/circabc-ewpp/ui/group/bab664d7-1188-47b2-9fa6-869902320ba2/library/255bfe45-b371-49a5-a292-cd19b6f9ff45/details.

Data matching with other registers

First, **data matching with other registers** is the most widely used tool, as reported by 17 national institutions (Austria (SVS), Belgium (RSVZ, RSZ), Bulgaria, Croatia, Cyprus, Czechia, Estonia, Finland, France, Iceland, Ireland, Italy, Lithuania, the Netherlands, Poland and Sweden). This strong reliance on data matching highlights its perceived effectiveness as a first-line defence, allowing institutions to cross-check applications against existing data and identify inconsistencies early in the process. For instance, the **Belgian RSVZ** described its data-matching approach as a filtering function: when data is submitted, it cross-references this information with its databases and national registers, and any discrepancies trigger a manual review. Similarly, **Bulgaria** explained that checks are carried out through its internal databases regarding the authenticity of the data filled in the application, and for the information received through the EESSI system. Similarly, **Estonia** compares the data submitted in the PD A1 application with the information in the Estonian official registers. If the information does not match, the institution will conduct a further investigation into the potential reasons why. Likewise, **Finland** noted that it matches the information provided on the application to the information received from, for example, the Digital and Population Data Services Agency and the Social Insurance Institution of Finland. Finally, **Sweden** obtains tax information from the Swedish Tax Agency and verifies that the employee's employer is legally established in Sweden through the Swedish Companies Registration Office.

Risk assessment models and fraud risk profiling

In comparison, **risk assessment models or fraud risk profiling** are used less frequently among the Member States observed, by only four national institutions (Belgium (RSZ), Czechia, Cyprus and Latvia). The fact that only four reporting entities apply this method suggests that advanced risk modelling is not yet standard practice across the EU and the EEA. Moreover, the **Belgian RSZ** explained that these models are still under development and currently serve more as supportive tools rather than stand-alone determinants for inspections. The process involves aggregating various data sources and characteristics identified in previous investigations to identify employers with similar profiles, thereby signalling potential risks of fraud. Alternatively, **Cyprus** reported that fraud risk profiling is carried out **manually** and not through the use of algorithms. Incidentally, **algorithms or automated risk indicators** are reported by even fewer institutions (Luxembourg and Poland) as a key measure aimed at detecting or preventing fraud. While these tools could significantly increase efficiency by flagging potential risks or fraud automatically, their application is still widely underused.

Cross-border data exchange

The available data also show limited uptake when it comes to **cross-border data exchange**, with only six national institutions (Czechia, Cyprus, Latvia, Luxembourg, Poland and Sweden) explicitly reporting its use. This is quite surprising given that PD A1 documents are inherently cross-border in nature, which suggests that while national institutions rely heavily on their own registers, systematic cooperation and (real-time) data exchange between countries during PD A1 application/issuance remains underdeveloped.

Scripts identifying suspicious patterns

Finally, only two national institutions report the use of **scripts to identify suspicious patterns** (Luxembourg and the Netherlands), demonstrating that such pattern-based monitoring is far from being a universal practice across the EU and the EEA. More specifically, **Luxembourg** explained that automated scripts are used to identify suspicious patterns, and cross-border queries are initiated whenever doubts arise. Flagged cases are then investigated and resolved in coordination with the relevant counterparts. Additionally, the **Dutch SVB** also stands out for its use of scripts to identify suspicious patterns, though it stresses that automated decision-making does not replace human review. While scripts are used to identify suspicious patterns (primarily by running queries), concerns of proportionality, ethics and the treatment of sensitive personal data (such as nationality) limit full automation.

Table 23: Types of anti-fraud measures

Methods	National institutions
Data matching	AT (SVS), BE (RSVZ), BE (RSZ) BG, CY, CZ, EE, FI, FR, HR, IE, IS, IT, LT, NL, PL, SE.
Risk assessment models / fraud risk profiling	BE (RSZ), CY, CZ, LV.
Algorithms / automated risk indicators	LU, PL.
Cross-border data exchange	CY, CZ, LU, LV, PL, SE.
Scripts identifying suspicious patterns	LU, NL.

Source: Author's own elaboration, based on survey and interviews.

Overall assessment of anti-fraud measures

In view of the above results, the use of risk assessment models, algorithms and scripts to identify suspicious patterns remains quite limited, outside of data matching, in most national institutions. Similarly, systematic cross-border data exchange during PD A1 application/issuance is still largely undeveloped, indicating substantial room for further adoption and integration.

Moreover, the overall comparative picture reveals three distinct tiers of development. At the high end, some national institutions (Czechia, Cyprus, Luxembourg and Poland) employ multiple tools (i.e. three). In the middle tier, three national institutions (Belgium (RSZ), the Netherlands and Sweden) use a maximum of two complementary measures. Most national institutions are located at the lower end, with 11 national institutions (Austria (SVS), Belgium (RSVZ), Bulgaria, Croatia, Estonia, Finland, France, Iceland, Ireland, Italy and Lithuania) indicating using only one specific fraud-prevention measure, exclusively focusing on data-matching techniques.

In this context, it is noteworthy that 14 national institutions (Austria (ÖGK), Denmark, Germany (ABV, DRV, GKV), Greece, Hungary, Latvia, Liechtenstein, Norway, Portugal, Slovakia, Slovenia and Spain) reported not employing any of the specific techniques aimed at detecting or preventing fraud in the context of Article 12 PD A1 application/issuance, which may suggest varying levels of institutional capacity across Member States. Of course, this assessment should not necessarily be interpreted as a lack of action, provided that these authorities undertake a thorough assessment of the posting conditions before issuing PD A1 certificates. Additionally, this may also reflect the fact that the responding national institutions are not competent to act in those specific cases. For instance, the **German DRV** explained that social security officials do not have reliable experience, as the inspections are mainly carried out by the German General Directorate of Customs. Likewise, **Hungary** indicated that it is not the jurisdiction of the National Health Insurance Fund of Hungary nor the competent government offices.

In conclusion, the findings therefore show an uneven approach among the institutions observed, with some countries relying on relatively advanced (digital) techniques to combat fraud, while others continue to operate with minimal targeted measures. In any case, it is apparent from the available information that data-matching techniques are the predominant method employed by national institutions to actively combat fraud.

Turning to available studies, the 2025 **ELA report *National cross-border digital tools and services in the field of EU social security coordination* largely corroborates these findings**. Specifically, the report highlights that automated checks are increasingly used by institutions across different social security domains to verify the accuracy of information supplied by users in application processes, primarily through data matching with national public databases or registers, while cross-border matching remains very limited (see also Section 6.2). The report also notes that several institutions employ algorithms and other advanced tools, including data mining, AI, machine learning, plausibility checks, data warehouses and business intelligence systems, although all automated checks involve some level of human intervention depending on the country. Despite these developments and preventive measures such as automated PD A1 eligibility checks, online verification tools, portals for updating personal information and e-ID systems, varying levels of digitalisation, limited interoperability, and the need for strong digital infrastructure and General Data Protection Regulation compliance continue to pose challenges, distinguishing Member States with more passive frameworks from those with advanced, active digital tools.

Similarly, the 2025 **ELA report *Fraud and error and selected issues in the field of social security coordination*** – *ELA strategic analysis* notes that several social security institutions with digitalised services are using automated checks integrated into their systems to verify the accuracy of information included in benefits applications. This includes data matching and the use of advanced digital tools such as data mining, algorithms and AI by many countries to target checks and identify potential fraud, with data mining selecting cases based on risk criteria identified through statistical analyses. Nonetheless, the report concludes that despite these national-level developments, data mining is generally unavailable in cross-border situations while data matching remains limited, thereby hindering the effective detection and tackling of fraud and error in cross-border contexts (see also Section 6.2).

6.3.2. Evaluation of measures

Following the review of the various anti-fraud measures implemented by national authorities, the next section intends to assess the effectiveness of these measures.

Institutional experiences

To evaluate the effectiveness of measures aimed primarily at detecting or preventing fraud (Section 6.1.1), information was also collected regarding their perceived effectiveness based on institutional experience. National institutions were asked to rate the effectiveness on a scale from ‘very effective’ to ‘not effective’ and provide further elaboration in more qualitative terms.

Among the 20 responding national institutions, the self-assessed effectiveness of their anti-fraud measures for PD A1 applications shows a clear distribution across three levels (see Table 24). First, the majority of respondents (13 institutions: Belgium (RSVZ, RSZ), Bulgaria, Germany (ABV), Estonia, Ireland, Spain, Croatia, Latvia, the Netherlands, Austria (SVS), Poland and Sweden) considered their measures to be moderately effective. Their assessments suggest that while the systems in place provide a reasonable level of protection against fraud, challenges remain in ensuring robust and fully reliable fraud prevention across borders. For instance, the **Belgian RSVZ** described that wherever checks are possible, robust systems are in place and generally perform well. Nonetheless, in their view, there is also significant room for improvement. One example given relates to the difficulties experienced in addressing large-scale fraud schemes involving Belgian residents, which often remain unaddressed due to their tax-related complexity. The **Polish ZUS** also commented that its system can be considered moderately effective, as it largely eliminates fraud *ex ante* by making it more difficult to falsify online statements and documents. At the same time, however, it acknowledges that limitations exist in detecting fraud at every stage of the process.

In contrast, only one national institution (Cyprus) reported its measures as very effective. This is noteworthy, as **Cyprus** also stands out from the earlier assessment (Section 6.3.1) for its use of multiple anti-fraud measures. The combination of these tools may partly explain why it is the only country to express strong confidence in its fraud-prevention system, highlighting the link between a broad toolkit and a higher perception of effectiveness. Furthermore, due to the relatively low number of postings from Cyprus, the national institution can gain a more detailed understanding of the specific circumstances at hand, which could improve its perceived effectiveness as a result.

Meanwhile, six national institutions (Czechia, Finland, Hungary, Iceland, Lithuania and Luxembourg) rate their measures as having only limited effectiveness. Nevertheless, the picture of limited effectiveness is nuanced by some national responses. For example, **Finland** commented that fraud in this area is a rare phenomenon, leading to its assessment of limited effectiveness. Also, **Czechia** indicated that it is hard to judge effectiveness if it is not strictly defined.

Table 24: Self-perceived effectiveness of anti-fraud measures

Methods	National institutions
Limited effective	CZ, FI, HU, IS, LT, LU.
Moderately effective	AT (SVS), BE (RSVZ), BE (RSZ), BG, DE (ABV), EE, ES, HR, IE, LV, NL, PL, SE.
Very effective	CY.

Source: Author's own elaboration, based on survey and interviews.

While the assessment of effectiveness thus varies, common themes can be identified in the qualitative responses obtained from the national institutions.

First, several national institutions highlighted that they rely heavily on caseworkers to detect irregularities. For instance, **Denmark** described its measures as being largely caseworker-driven, supported by a red flag system to highlight suspicious (employer) patterns. **Luxembourg** similarly pointed to the fact that audits require manual resources in order to be effective. **Bulgaria** equally stressed that all facts and circumstances stated in the application are investigated, and, if necessary, additional documents and written explanations are required in order to prove what was declared in the application. The **Dutch SVB** also stressed that while it uses scripts to identify suspicious patterns, this does not imply wrongdoing but serves as an indicator for manual review to verify the accuracy of prior insurance.

Second, several national institutions stressed that the effectiveness of their measures is constrained by the honesty and accuracy of information provided by the applicants. For instance, **Ireland** acknowledged that most claimants submit honest applications, but a small proportion will always try to abuse the system, leading to the institution's moderate assessment of effectiveness. To a similar extent, **Luxembourg** pointed to its reliance on employer-provided data, which makes the effectiveness of anti-fraud measures rather limited. Likewise, **Latvia** stressed that difficulties occur when an undertaking provides false information. **Belgium (RSVZ)** also commented that verification opportunities remain limited because much depends on applicant declarations. Finally, **Estonia** explained that digital registers are filled in by individuals and employers themselves, which raises the risk that PD A1 certificates may be based on inaccurate information.

Third, some countries indicated that they have strengthened interinstitutional coordination and enhanced data use, thereby improving the effectiveness of fraud prevention. For instance, **Belgium (RSZ)** commented that its processes consists of the aggregation of data sources and characteristics from previous investigations to flag employers with similar profiles, thereby signalling potential fraud risks. Even so, it was stressed that the models are still supportive tools rather than decisive instruments. Similarly, **Croatia** uses a digital system that links all relevant registers; if a worker is deregistered from insurance after receiving a PD A1 certificate, the system automatically alerts clerks who can revoke the certificate. The **Dutch SVB**

explained that it uses scripts and queries to detect suspicious patterns, such as mismatches between nationality and applicable legislation. While AI is not yet operationally deployed, the country is exploring its use cautiously, with strong attention to ethical oversight and data protection. Interestingly, **Lithuania** has set up an interinstitutional centre that brings together the state labour inspectorate, the state tax inspectorate, SODRA, the financial crimes investigation service, the police department and the state border guard for the purpose of sharing data and investigating suspicious cases collectively.

Conversely, some institutions reported that divided responsibilities between authorities can result in difficulties as well. For instance, **Belgium (RSVZ)** highlighted that social dumping is often intertwined with tax issues, an area in which it lacks competency. Similarly, as it is not an inspectorate, it lacks the resources to conduct in-depth investigations. **Spain (TGSS)** considered its practices only as moderately effective because the labour inspection is not integrated with the institution, meaning that while it can carry out checks on the requirements, the labour inspection conducts the other verifications and determines whether the requirements are met.

Finally, in countries where the volume of postings is low or instances of fraud are rare, institutions logically report that they can examine each case in more detail. As mentioned above, **Cyprus** explained that the low number of postings allows for a more in-depth assessment of circumstances. **Finland** also considered fraud to be rare, largely because the high level of Finnish social security contributions discourages abuse, even though its measures remain limited in scope. Similarly, **Germany (ABV)** judged its procedures to be appropriate, largely due to the small number of fraud scenarios in its sector.

Statistics

Most national institutions have not reported any statistics on fraud detected in the context of PD A1 applications. The only exceptions are Spain, which reported 14 companies and 1 097 employees in 2024, and Poland, which recorded 88 instances relating to all types of situations under Title II of Regulation (EC) No 883/2004 in the same year. This widespread lack of reporting therefore makes it difficult to obtain a complete view as to the scale and patterns of fraud in this area. In turn, one possible recommendation could be for Member States to strengthen data collection and evaluation of the effectiveness of control measures, while ensuring that such efforts do not create an unnecessary administrative workload.

These findings also align with previous reports in this area. For instance, the 2025 ELA report *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis* confirms that statistics on fraud and error in social security coordination remain scarce, as only a few Member States provide quantitative data, and most countries do not collect or report them on a consistent basis. Where figures do exist, the share of fraud and error in applicable PD A1 legislation remains below 1 % in the majority of reporting Member States, although issues such as falsified documents, fabricated self-employment, letterbox companies or misclassified employment status are noted. In addition, the 2025 Commission report *Fraud and error in the field of EU social security coordination* highlights that cases are also highly concentrated, with nearly 80 % of PD A1 fraud and error instances attributed to just two Member States from the perspective of receiving Member States (i.e. Belgium and Germany) during the observed period ([28]). This is also linked to the fact that they are among the few countries that systematically collect this information ([29]). Additionally, it has to be noted that while the prevalence of fraud and error appears low, this may reflect limited detection and monitoring capacities rather than the true scale of the problem.

The PD A1 statistical report ([30]) (on PD A1 certificates issued in 2023) also provided data from the perspective of the sending Member States. In 2023, Slovakia withdrew 698 PDs A1, Poland 540 (including 215 that were falsified), Latvia 501, Italy 401, Bulgaria 23 and both Iceland and the Netherlands 1 each. Additionally, Spain reported 109 fraudulent cases, Czechia 79 and Slovenia 5.

6.3.3. Elements most often subject to non-compliance posting conditions / posting conditions most often falsified

National institutions were also asked to indicate which posting conditions represent the main cause of non-compliance in PD A1 applications, in particular those issued under Article 12(1) or Article 12(2) of Regulation (EC) No 883/2004. Their

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([28]) European Commission: Directorate-General for Employment, Social Affairs and Inclusion, De Wispelaere, F., De Smedt, L. and Pacelot, J., *Posting of Workers: Report on A1 Portable Documents issued in 2023*, Publications Office of the European Union, Luxembourg, 2025, https://data.europa.eu/doi/10.2767/4389721.

([29]) European Commission: Directorate-General for Employment, Social Affairs and Inclusion, De Wispelaere, F., De Smedt, L. and Pacelot, J., *Posting of Workers: Report on A1 Portable Documents issued in 2023*, Publications Office of the European Union, Luxembourg, 2025, https://data.europa.eu/doi/10.2767/4389721.

([30]) European Commission: Directorate-General for Employment, Social Affairs and Inclusion, De Wispelaere, F., De Smedt, L. and Pacelot, J., Posting of Workers: Report on A1 Portable Documents issued in 2023, Publications Office of the European Union, Luxembourg, 2025, https://data.europa.eu/doi/10.2767/4389721.

responses provided valuable insight into the (practical) challenges encountered in the application of the posting rules and highlighted the factors most frequently leading to irregularities or fraud.

As a preliminary observation, it should be noted that several national institutions (Czechia, Denmark, Germany (DRV), Estonia and Slovenia) stated that no conclusions could be drawn due to the low number of (fraudulent) cases and lack of statistics in this area (see Section 6.3.2).

Substantial activity

Across several national institutions (e.g. Belgium (RSZ), Bulgaria, Cyprus, France, Iceland, Italy, Latvia, the Netherlands, Portugal, Slovakia and Spain), the single most reported ground for non-compliance of PD A1 applications is failure to demonstrate **substantial activity**, with a variety of concrete manifestations. For example, the **Belgian RSZ** reported that the substantial activity requirement is difficult to control in practice, given the volume of postings from Belgium. In cases of serious doubt, overlaps or errors, it does request detailed work calendars. Similarly, **Spain** stressed that the main causes of non-compliance are potential letterbox companies that do not perform any substantial activity in Spain. Likewise, **Latvia** noted that the fact that an undertaking was recently established and thus does not possess a history of economic activity is a major ground of non-compliance in its country. Several national institutions also explicitly pointed to insufficient turnover as a decisive criterion within the substantial activity requirement (e.g. Bulgaria, Italy, Poland and Slovakia). For instance, **Bulgaria** highlighted that irregularities mainly stem from 'a discrepancy between the declared and the real turnover of the posting company'. In addition, **Italy** noted several anecdotal cases of non-compliance in which employers did not meet the '25 % substantial activity in Italy' criterion.

Prior affiliation

A second recurring theme concerns the requirement of **prior affiliation**, which is reported by several national institutions (e.g. Ireland, Luxembourg and the Netherlands) as a key ground of non-compliance. For instance, **Ireland** reported that most applications fail on prior affiliation grounds. In its experience, such cases typically arise from employers undertaking a contract in the EU for the first time, and who may lack full awareness of the requirements that must be met in advance. Some national institutions (Belgium (RSZ) and Ireland) also indicated the **duration of posting** as another ground of contention. One national institution (Cyprus) also hinted at the **direct relationship** criterion as being decisive. Finally, two national institutions (Belgium (RSZ) and the Netherlands) highlighted major issues regarding the criterion of the **replacement ban**. For instance, the **Dutch SVB** highlighted that while terms such as 'lending, substitution, and replacement' exist in theory, they are rarely verifiable in individual cases, as applications do not provide clarity on whether a worker is replacing another. In its experience, these conditions are not rigorously tested in practice and are not prioritised for enforcement due to the inherent difficulty of establishing evidence.

Misclassification of employment status

A third consistent pattern concerns **misclassification of the worker's employment status** and problems linked to Article 12(2) applications for **self-employed persons**, with false self-employment recurring as a primary cause of non-compliance (e.g. Belgium (RSVZ), the Netherlands, Austria (SVS), Poland and Slovakia). For example, the **Dutch SVB** noted that a recent area of discussion concerns the distinction between self-employed status and employment. While the SVB has a clear stance on this issue, different interpretations across Member States mean it is important to be cautious when drawing definitive conclusions. **Belgium (RSVZ)** reported that a common reason for withdrawal on its side is when applicants indicate that they are self-employed while abroad, whereas the foreign authority later determines that their status is, in fact, salaried. Also, **Slovakia** highlighted that in Article 12(2) applications, it is the aforementioned issue of false self-employment which is often the recurring theme. The **Polish ZUS** equally pointed to the fact that some of the self-employed workers change the nature of their activity during posting as one main cause of non-compliance with PD A1 applications. These findings show that the legal (and factual) distinction between self-employment and employment is a point of contention. Additionally, the **Austrian SVS** found the notion of a '**similar activity in host MS**' for self-employed persons to be a major ground of non-compliance in PD A1 applications.

Administrative errors

As a final and general observation, some replies from the national institutions pointed to the administrative limitations of the process itself: refusals or withdrawals often result from minor declaration errors, rather than from clear-cut instances of fraud. For instance, the **Belgian RSVZ** noted that 'individuals often misjudge their own situation'. Also, **Ireland** alluded to the fact that mistakes (on prior affiliation) often arise from applicants who are 'not fully aware as to what they need to have in advance'.

Other sources also yielded similar results. For instance, the 2025 ELA report *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis* describes that fraud in the context of applicable legislation often involves irregular postings, such as when employers falsely claim to carry out substantial activity in the sending country, use fictitious companies, exploit non-EU-country nationals or rely on long subcontracting chains. It also includes non-declared posted workers where employers evade social security contributions, along with the use of false PD A1 forms to unlawfully access workplaces without proper declarations.

Also, the 2025 Commission report *Fraud and error in the field of EU social security coordination* highlights how issues arise from beneficiaries' lack of understanding of the applicable legislation, as beneficiaries, employers and institutions find the rules on activity in more than one Member State, the determination of whether an undertaking is carrying out a significant part of its activity in the sending or posting state, or the determination of marginal work hard to understand and difficult to apply. In summary, Member States consider the applicable criteria to be too ambiguous or manipulable, and fictitious structures further complicate the determination of applicable legislation.

6.4. Good practices and innovations

This report also sought to identify any specific innovations or good practices related to PD A1 verification or issuance among the EU and EEA countries concerned, with a focus on control mechanisms and anti-fraud measures in this area. Despite the limited nature of the available data, the comparative analysis reveals three kinds of initiatives.

First, several institutions highlighted the development of **technical tools** to strengthen the authenticity verification of PD A1 certificates. **The Spanish TGSS** pointed to the use of a code printed on the PD A1 certificate, which can be checked online to confirm authenticity and retrieve a comparable document, even if the paper certificate carried by the worker is later altered or forged. **France** went even further, reporting the creation of a control database within the EESSI system that consolidates useful notifications for verification (see Box 14 below). The **Polish ZUS** has also implemented a digital tool known as the 'Verification of A1 certificate authenticity', accessible through its social security website, which allows immediate online validation of a certificate's legitimacy. The tool was introduced to combat fraudulent and invalid PD A1 certificates, particularly among Polish workers posted in Belgium, Germany and France, where labour inspectorates face high volumes of documents and limited time for verification. The system cross-references the ZUS database, while also allowing direct ZUS checks in cases where certificates are not yet visible due to timing factors. By enabling fast, independent and cost-effective verification, the service should reduce fraud cases and at the same time strengthen cooperation between institutions across the EU and the EEA.

Box 14: Good practice 1, France

Contrôle de la Législation Applicable de Sécurité Sociale (CLASS) Database – France (31)

A recent monitoring tool introduced in France is the CLASS database, which is available to inspectors, police, social security institutions and other authorities. The CLASS database includes a range of information on international mobility and was developed by the institution's national fund, though it is accessible to other French control inspectorates upon agreement. It contains historical data from its predecessor, Sirdar, used for PD A1 certificates until 2021, along with data from the EESSI system and posting declarations from the Information System on International Services (Système d'Information sur les Prestations de Services Internationales) database of the French Ministry of Labour. In practice, this facilitates the work of inspection services when detecting fraud in the area of posting. In the long term, the CLASS database could optimise the targeting of foreign companies with a strong presumption of fraud by cross-checking data and using data-mining methods, though a decree is required to provide a legal basis for this approach.

In this context, another tool developed by France is the **Instruction Législation Applicable de Sécurité Sociale** ([32]). This portal allows undertakings, self-employed workers and individuals to submit requests for PD A1 certificates. It includes automatic checks to ensure compliance. In case the checks fail, the request is either transferred for review or automatically rejected, depending on the criteria.

([31]) See also ELA, *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis*, Publications Office of the European Union, Luxembourg, 2025, https://www.ela.europa.eu/sites/default/files/2025-03/SSC_final_report_20250317_cover.pdf.

([32]) ELA, 'ELA good practices – Management and control of international professional mobility – France', ELA, 2024, https://www.ela.europa.eu/sites/default/files/2025-03/FR_GP2024_URSSAF_Management_and_control_of_international_professional_mobility.pdf.

A second approach emphasises **data integration and proactive monitoring** within national systems. **Croatia** reported that it has comprehensive databases covering both insured persons and contribution-paying employers, with data matched on a monthly basis. As a result, any discrepancies or omissions, such as an employer failing to report changes, can be promptly detected and addressed. **Latvia** explained that it enjoys access to some administrative databases, which support verification, although it acknowledged that not all relevant information is available. Finally, the Croatian model shows how extensive national databases can serve as an early-warning system, enabling near real-time detection of irregularities.

Finally, some countries described **manual processes and institutional cooperation** as particularly good practices regarding the inspection and verification of PD A1 certificates for posting. For instance, **Cyprus** highlighted the practice of interviewing employers (especially new ones) as a means of verifying the credibility of declarations and conditions underlying PD A1 applications. **Czechia** explained that a meeting is planned between the national liaison office, the ministry of labour and social affairs and the labour inspectorate, with PD A1 inspections designated as a priority in its planning. As described above, Latvia's access to the databases of other administrative institutions also constitutes a good example thereof.

Other sources also highlighted relevant case studies. For instance, in **Belgium**, the **RSZ data mining team** provides quarterly target lists of high-risk employment sites and recruits with the aim of identifying social dumping actions ([33]). AI capabilities are planned to support a self-learning data-mining model, while the data is used to organise inspections as efficiently as possible. All RSZ cross-border employment inspectors at the level of the provincial directorates have a **business intelligence tool** to make their own file-related data-matching queries. Data are subsequently fine-tuned using several databases, including **Checkinatwork, Dimona, Limosa and Gotot IN**, to select at-risk companies, particularly in sectors with mobile employment. For identifying potential irregularities under **Regulation (EC) No 883/2004**, the **Limosa** (declarations on incoming posted workers) and **Gotot IN** (incoming PD A1 certificates) databases are crucial. It is reported that the use of data-mining and data-matching tools has resulted in a high percentage of infringements being identified during inspections and the more efficient use of limited human resources.

In **Austria,** the **EGDA.AZUR database**, launched in 2023, is connected to the **EESSI system** and provides access to all social security institutions (including the anti-fraud office), the financial police and the Construction Workers' Annual Leave and Severance Pay Fund ([34]). It is used to identify issues related to **PD A1 certificates**.

In **Portugal,** the **determination of legislation applicable (DLA) application**, developed by the **Portuguese Social Security Institute**, streamlines the application for PD A1 certificates in Member States, along with Switzerland and the United Kingdom, resulting in reduced processing time ([35]). The tool includes authenticating features such as a **PD A1 validation tool**, supporting authorities in applying legislation correctly and preventing errors and fraud. Employers, self-employed workers and clerks can access the DLA application via the institute's website or the central social security service application, submit PD A1 requests, and check the status of, cancel or extend postings. Data are then verified against existing social security records, and if the requirements are met, PD A1 certificates are automatically issued. Inspectors from other countries can verify potential fraud using the validation tool with the **validation code** issued by the Portuguese Social Security Institute.

Another case of good practice is provided by the **Association of Employment Agencies** in Poland, which developed and published an **accessible guide** for insured workers and employers about social security in case of postings ([36]). The aim is to reduce vulnerability to exploitation and minimise risks of mismanagement by employers. The guide was prepared through various consultations with Polish institutions and is freely available online in multiple languages, periodically updated and supported by workshops to increase awareness. Similarly, the **Foreign Trade Center Bavaria** hosts an online portal ([37]) which provides German companies with clear and accessible information on the cross-border provision of services and posting of workers (e.g. on PD A1 forms) ([38]). Through structured updates, expert articles, interactive webinars and advisory support, the portal intends to translate complex legal requirements into understandable language.

([33]) ELA, *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis*, Publications Office of the European Union, Luxembourg, 2025, https://www.ela.europa.eu/sites/default/files/2025-03/SSC_final_report_20250317_cover.pdf.

([34]) ELA, *Fraud and error and selected issues in the field of social security coordination – ELA strategic analysis*, Publications Office of the European Union, Luxembourg, 2025, https://www.ela.europa.eu/sites/default/files/2025-03/SSC_final_report_20250317_cover.pdf. See also https://www.parlament.gv.at/dokument/××VII/I/1488/fname_1448279.pdf.

([35]) ELA, 'Institute of Social Security of Portugal awarded for its innovative tool in preventing social security fraud', ELA website, 11 July 2024, https://www.ela.europa.eu/en/news/institute-social-security-portugal-awarded-its-innovative-tool-preventing-social-security; ELA, 'ELA good practices – DLA application – Posting of workers – Portugal', ELA, 2024, https://www.ela.europa.eu/sites/default/files/2024-04/PT_good-practice_dla-application_posting-of-workers.pdf; ELA, *National cross-border digital tools and services in the field of EU social security coordination*, Publications Office of the European Union, Luxembourg, 2025, https://www.ela.europa.eu/en/publications/national-cross-border-digital-tools-and-services-field-eu-social-security-coordination.

([36]) ELA, 'ELA good practices – Accessible guide for insured workers and employers about social insurance when seconding to work abroad – Poland', ELA, 2024, https://www.ela.europa.eu/sites/default/files/2024-04/PL_good-practice_guidebook-on-secondement.pdf.

([37]) https://weltweit-erfolgreich.de/entsendung/.

([38]) ELA, 'ELA good practices – Dienstleistungskompass.eu – online portal about cross-border provision of services and posting of workers – Germany', ELA, 2024, https://www.ela.europa.eu/sites/default/files/2025-03/DE_GP2024_Dienstleistungskompass.eu_.pdf.

7. Conclusions: challenges and potential improvements at the EU level

The preceding chapters examined the digital tools, assessment practices and control mechanisms used by Member State and EEA institutions to administer and issue PD A1 certificates for posting situations under Article 12 of Regulation (EC) No 883/2004. This analysis was based on a comprehensive collection of data through questionnaires, interviews and desk research, covering 28 EU/EEA countries and 32 institutions responsible for PD A1 issuance. This concluding chapter now synthesises the **main findings**, identifies **persistent challenges** and suggests **potential improvements** at the EU level.

The chapter is structured into four main sections:

- **Section 7.1** provides a consolidated summary of the key findings across the three main analytical dimensions: the digitalisation of application procedures (Chapter 4); the grounds for assessment and the administrative workload (Chapter 5); and control mechanisms and anti-fraud measures (Chapter 6);
- **Section 7.2** examines the main challenges that national authorities have encountered in implementing the posting framework, drawing on quantitative and qualitative data;
- **Section 7.3** outlines potential improvements to PD A1 issuance procedures; and
- **Section 7.4** identifies opportunities to strengthen control and verification mechanisms.

7.1. Summary of key findings

7.1.1. Digitalisation of PD A1 application procedures (Chapter 4)

The analysis revealed that **online portal availability and scope** have become the norm, with 88 % of institutions (covering 98 % of PD A1 certificates) operating **online portals** for Article 12 applications. Only four national institutions (Cyprus, Greece, Iceland and Liechtenstein) were found to rely exclusively on non-portal channels. Moreover, the research identified that most portals (79 %) process applications under **Articles 12, 13 and 16**, while **strong authentication mechanisms** were observed to combine national e-ID systems (75 %), business registration checks (25 %) and bank-ID systems (32 %), though **foreign authentication** remained inconsistent across jurisdictions. While several countries accept **EU eIDAS credentials**, most systems were found to require domestic registration, creating barriers for cross-border employers.

The study also found that **fully online application processes** are standard in 79 % of institutions (89 % of PD A1 certificates), with remaining offline steps relating to additional documentation, signatures or identity verification. The **automatic acknowledgement of receipts** was identified as a near-universal practice (89 % of institutions), which is typically an instant process. Issuance decisions were also found to be delivered **electronically via portals** (75 % of institutions, 95 % of PD A1 certificates), though postal delivery persists as a fallback measure among 43 % of national institutions. Among the cases observed, the prevalence of **user-friendly features** sees a wide range of adoption across the institutions concerned, including **prefilled forms** (71 % of portals), integrated help functions (54 %), **real-time status tracking** (29 %), multilingual support (39 %) and **bulk requests** (16 %), suggesting that there remains significant potential to improve the applicant-facing experience in institutions where these features are lacking.

Processing times also appear to vary considerably, from being near instant to taking several weeks. More specifically, **fast-track systems** (as seen in Belgium (RSZ), France, Austria (ÖGK), Slovenia and Finland) were found to achieve decisions within 24 hours by combining strong authentication, data reuse, legal rules engines, plausibility checks and overlap detection. Systems relying on manual verification were observed to report processing times of two to four weeks or longer (such as in Bulgaria, Norway, Poland and Sweden for complex cases). Institutions reporting **high automation** (28 %, covering 24 % of PD A1 certificates) typically issue 50–80 % of certificates **automatically** using **deterministic, rule-based checks**. However, the analysis also revealed that 38 % of institutions (10 % of PD A1 certificates) report no automation at all, with the remaining institutions at intermediate levels. **EESSI interconnection** was found to be widespread, with half of the national institutions observed automatically triggering LA_BUC_04 notifications. **Advanced anti-forgery features** (e.g. QR and verification codes) remained rather limited to just 19 % of institutions (24 % of PD A1 certificates).

7.1.2. Grounds of assessment and administrative workload (Chapter 5)

The analysis found a **near-universal consensus** among the national institutions observed for checking **essential geographic and temporal data elements**. For employed persons, all national institutions were found to check posting duration, host country and previous posting periods. Assessments for those self-employed showed a similar degree of convergence (97 % checking posting duration and 93 % previous postings). Furthermore, the **prior affiliation** checks occurred in 97 % of institutions for employed and 90 % for self-employed persons, with these checks taking place almost exclusively ***ex ante***.

The study also found **significant variation** in how national institutions assess data elements related to the **substantial activity**. For **employed persons**, checks for the company's registered office showed a high level of consistency (83 % of institutions, 90 % of PD A1 certificates), but **financial indicators** revealed substantial gaps. Moreover, the data element for **turnover** was observed to be checked by 53 % of institutions yet covers 80 % of PD A1 certificates due to more consistent verification by high-volume national institutions, while company establishment length affects only 32 % of PD A1 certificates. Similar variability was observed in **direct employment relationship** checks: the obligation to pay remuneration was applied by 63 % of institutions to 82 % of PD A1 certificates, but disciplinary action and worker placement verification were applied inconsistently, at 43 % (institutions) and 29 % (PD A1 certificates) and 43 % (institutions) and 68 % (PD A1 certificates), respectively. Concerning **self-employed persons**, checks relating to maintaining an office (77 % of institutions, 94 % of PD A1 certificates) and tax verification (63 % of institutions, 85 % of PD A1 certificates) demonstrated a moderate level of consensus. However, registration with professional bodies was checked by 40 % of institutions and affected 90 % of PD A1 certificates due to their prevalence among high-issuing German and Slovak institutions.

The research confirmed that ***ex ante*** **verification is dominant**, with national institutions overwhelmingly conducting checks before issuance. For employed persons, **all basic elements** were found to be verified *ex ante* by 93 % to 100 % of institutions. Even for criteria such as the location of the company's office (80 % *ex ante* compared to 3 % *ex post*) followed this pattern. *Ex post* checks appeared primarily for direct relationship criteria in a small minority of cases, such as in Spain and France. Similar patterns were observed in the assessments of self-employed persons, with **limited *ex post* checks** for VAT maintenance and office requirements (10 % of institutions for each data element).

The analysis also revealed that national institutions **rely heavily on applicant declarations** across most assessment grounds. While this reliance is widespread, the study found that cross-verification against administrative registers does occur, though its application is rather targeted. The most significant use of registers was observed in the verification of the data element for **previous posting periods**, where data were checked against internal registers for cases corresponding to 38 % of PD A1 certificates issued (21 % manually, 17 % automatically). Similarly, a worker's **prior affiliation** with the sending state's social security system was an area where internal registers were frequently consulted. For self-employed persons**,** the use of internal registers was similarly limited, with the data element for **previous posting periods and gaps** being checked through internal registers by 63 % of institutions, affecting only 58 % of PD A1 certificates (49 % manually, 9 % automatically).

After reviewing the procedures for carrying out checks among the national institutions, three main categories of challenge types emerged: **(1) legal interpretation difficulties**, such as ambiguous terminology and varying national understandings of terms like replacement ban and self-employed; **(2) practical data collection obstacles**, such as limited real-time access to tax/revenue data, lack of database integration and the need to request and translate foreign documentation; and **(3) operational verification problems**, such as identifying deliberately false information, distinguishing genuine from false self-employment and verifying prior activity.

The subsequent analysis went beyond examining which checks the national institutions carry out for PD A1 issuance, but rather the extent of the administrative workload resulting from such checks for both applicants and institutions. Using a quantitative framework with normalised scores ranging from 0 (lowest workload) to 1 (highest workload), the study assessed multiple dimensions, including information requirements, process complexity, portal usability, verification effort and automation levels. **For applicants**, scores ranged from 0.11 in Spain (low workload) to 0.79 in Latvia (high workload), with an overall average of 0.34. The highest workload was seen in criteria relating to the usability of the online portal, indicating common issues resulting from authentication, prefilled data, tracking and bulk handling. **For institutions**, workload scores ranged from 0.09 in Luxembourg to 0.90 in Bulgaria, with an overall average of 0.46. More specifically, the criterion representing the extent of verification effort and automation levels indicated the highest workload, reflecting the substantial use of *ex ante* checks and uneven back-office automation. Finally, the 2×2 **comparative workload matrix** revealed distinct national approaches. For instance, eight countries achieved a low workload for both dimensions, 10 exhibited a high workload for both and others demonstrated more asymmetric patterns in which they shift the workload onto either applicants or institutions.

7.1.3. Control mechanisms and anti-fraud measures (Chapter 6)

In line with other reports at the EU level, the analysis in Chapter 6 shed light on the progress made in detecting and tackling fraud and error in the area of PD A1 certificates through EU and national initiatives. A number of important points stand out.

First, despite efforts to identify additional data sources, the **limited availability of data on fraud and error at the national level was confirmed, including the statistics of PD A1 contestations and withdrawals**. This remains a significant barrier to assessing the real levels of fraud and error in social security coordination and the resulting implications.

Second, comparative analysis confirmed that **control mechanisms for PD A1 certificates are widespread but diverse across Member States**. Most institutions conduct both *ex ante* and *ex post* verifications of applicants' declarations to reveal any misrepresentation of the real situation, with the former checks relying mainly on database cross-checks and the latter combining both reactive and proactive measures. **Automation levels vary significantly**: some institutions operate highly automated systems with integrated red flagging tools, while others rely largely on manual checks. Hybrid models are common, where automation supports but does not replace caseworker discretion. Contestations and reassessments are relatively rare, but when they occur, they typically require cooperation between social security institutions and labour inspectorates and sometimes tax or judicial authorities.

Third, **cross-border cooperation is strongly anchored in EESSI notifications**, which serves as the cornerstone of verification practices. Most institutions use it as the primary tool for exchanging information and the basis for cross-checking data – often complemented by direct exchanges via the IMI system, email or phone – and manual verification. Country-level responses indicate growing reliance on online verification portals, though uneven availability creates asymmetries, while QR code verification remains limited to a few Member States. Some countries have developed layered systems combining the EESSI system, direct exchange, portals and QR codes, whereas others adopt a more minimalist approach. Overall, **reliance on EESSI notifications reduces the perceived need for additional tools**, **yet development** among the national institutions **remains uneven**.

Finally, regarding anti-fraud measures, data matching with internal and external registers is the most commonly used tool, while advanced approaches such as risk assessment models, algorithms and scripts identifying suspicious patterns are still relatively underused. Most institutions rate their measures as moderately effective.

7.2. Challenges identified by national authorities

7.2.1. Challenges in digital tool implementation and portal functionality

The findings presented in Chapter 4 suggested that **authentication barriers for foreign users** pose a significant challenge, as most systems rely on national e-ID schemes, business registrations or tax identifiers that assume domestic establishment. This, in turn, leads to a circular challenge where employers must register domestically to apply for a PD A1 form, yet registration may require proof of activity or affiliation. While some countries accept EU eIDAS credentials, this remains conditional upon domestic registration. The analysis also revealed **limited interoperability with national registers**, with only 39 % of the national institutions observed achieving automatic data retrieval despite most information already existing in government databases. This disconnect can be partly attributable to **technical barriers** (such as the lack of API connections) and **legal obstacles** (due to data protection rules). Several national institutions also highlighted the absence of direct links with their respective revenue departments, thus requiring formal requests rather than automated queries.

The research found an **uneven adoption of certain features** among the national institutions observed, despite the potential efficiency gains that their portal could provide. For instance, **real-time tracking** exists in only 29 % of portals, **bulk requests** in 16 % and **multilingual support** in 39 %. Furthermore, it was observed that **change notification procedures** varied considerably. These ranged from direct portal updates and cancellation/resubmission to message-based routes using secure channels that, in turn, created uncertainty for cross-border employers and resulted in a greater institutional workload. Finally, a small number of Member States (Cyprus, Greece, Iceland, and Liechtenstein) **do not operate online portals**, relying instead on email, postal or other non-portal channels, creating asymmetric service levels across the EU and the EEA in terms of digitalisation.

7.2.2. Challenges in applying assessment grounds and verification criteria

The findings presented in Chapter 5 revealed that a **lack of precise, harmonised definitions of key legal concepts** is a consistent challenge shared by many of the national institutions observed, particularly with regard to central posting prerequisites. The **substantial activity** requirement is a case in point: Poland highlighted the difficulty of interpreting

'approximately 25 % turnover', while the Netherlands noted certain theoretical conditions in the regulatory framework (such as through-lending and replacement ban) are difficult to test in practice due to varying interpretations across national institutions. The analysis also found that **self-employment assessments** face key obstacles. Spain identified differing definitions between Member States, while Belgium observed lenient interpretations across different Member States, which could potentially undermine their regulatory intent.

Chapter 5 also revealed that some national institutions consistently cite **data availability and accessibility as issues**. For example, Lithuania lacks access to income data and income-source definitions, Poland faces inadequate database integration, which requires formal requests, and Spain must request and translate documentation received by other countries. Furthermore, Austria stated that it cannot verify information obtained from abroad, while Belgium only has retrospective access to revenue data after a period of typically two years. Finally, the results also found that, once the necessary information has been collected, national institutions encounter a final set of **operational and technical problems in the assessment itself**. These include the allocation of an employer's turnover between Member States (Cyprus), the deliberate provision of false information by applicants, particularly concerning turnover data (Slovakia) and distinguishing genuine from false self-employment (the Netherlands and Slovakia).

7.2.3. Challenges in control mechanisms and anti-fraud detection

The research found that the current anti-fraud measures emerging from self-assessments were only **moderately effective**, with most institutions (12 out of 20) rating them as such. Only Cyprus considered measures very effective, while seven rated them as limited. Furthermore, an analysis of the qualitative responses revealed a heavy reliance on the **honesty of applicants** (as was the case in Belgium (RSVZ), Estonia, Ireland, Latvia, Luxembourg and Sweden), with institutions noting that even the most sophisticated systems remain vulnerable to cases where applicants deliberately provide false information since some of them cannot be cross-checked with any other data source. Furthermore, it was found that there is a broad **underutilisation of advanced detection technologies** among the national institutions concerned, with data matching widely adopted but sophisticated techniques showing more limited usage (such as risk models**,** algorithms and suspicious-pattern scripts).

It was also revealed that **fragmented institutional responsibilities** can result in verification gaps. For instance, Belgium (RSVZ) highlighted cases in which social dumping was intertwined with tax issues outside its area of expertise, while Spain (TGSS) noted that its separation from the labour inspectorate meant that comprehensive fraud detection necessarily required **coordinated action** across multiple bodies. Additionally, **constraints on cross-border cooperation** were found to persist, despite the EESSI system becoming a cornerstone of the national institutions. The Netherlands explained that the quality of cooperation can vary significantly according to the partner country.

Chapter 6 also identified that the **lack of comprehensive fraud statistics** hinders assessment, as most institutions do not report such data. Rather, only Spain (14 companies, 1 097 employees in 2024) and Poland (88 instances) provided quantitative information in this regard. This widespread absence prevents **evidence-based policy development**, more efficient resource allocation and the ability to benchmark performance against peers. Where statistics are available and point to a fraud rate of below 1 %, this may instead **reflect limited detection capacity** rather than an actual low incidence of fraud. Furthermore, the study identified **recurring causes of non-compliance**, suggesting areas where improved guidance could help to reduce irregularities. For example, the most frequent cause of non-compliance was failure to demonstrate **substantial activity**, including letterbox companies, recently established undertakings and insufficient turnover. **Prior affiliation** was the second recurring theme, with Ireland reporting that most failures occur here. Additionally, the **misclassification of employment status**, particularly false self-employment, emerged as a third key pattern. Importantly, some replies indicated refusals often result from minor declaration errors rather than deliberate fraud, suggesting **improved guidance** could prevent a significant proportion of non-compliance.

7.3. Potential improvements on PD A1 issuance

The following potential improvements to the PD A1 issuance system are proposed based on the analysis of Chapters 4 and 5 and the key findings identified therein.

1. Setting up a list of PD A1 online portals.

While PD A1 online portals are widespread across the EU, a single list of PD A1 portals is lacking, limiting the awareness of digital channels. In this respect, the Commission, with the ELA's support, can establish a single, publicly available register of PD A1 online portals. The register can integrate the already publicly available list of institutions issuing PD A1 certificates, which is available on the Your Europe portal on the Commission's website. For each Member State institution, the register

can provide a link to the portal and a reference, if available, to the tools used to certify the authenticity of issued documents (e.g. QR codes and webforms). To increase reach, the list can be cross-referenced on the ELA's website.

2. Standardise and expand user-friendly portal features.

Beyond listing these portals, their functionality is key to reducing administrative workload. For instance, the analysis revealed significant disparities in portal functionality, with the absence or inadequacy of user-friendly features often resulting in a higher administrative workload. Member States could prioritise implementing core features that demonstrably reduce the applicant-facing workload, such as prefilling forms with data from national registers (currently available in only 71 % of portals), real-time application status tracking with proactive notifications (currently 29 %), bulk request capabilities for employers with multiple postings (currently 16 %) and integrated help functions or chatbots (currently 54 %). Good practices from countries such as Belgium, Slovenia and Finland could inform these developments, specifically their combination of automated data retrieval and user guidance, by participating in the ELA's yearly calls for good practices ([39]) and being included in the ELA's good practices database.

Additionally, expanding multilingual support beyond the current 39 % of portals would benefit cross-border employers in particular. To this end, ELA has an ongoing offer to directly support Member States with the translation of institutional website content and other national official communication materials, including information related to PD A1 tools and procedures.

3. Enhance cross-border accessibility of online portals.

Even portals with advanced features are ineffective if their users are not able to easily access them. A significant barrier to the efficient issuance of PD A1 certificates is the limited accessibility of national portals for foreign employers. To address this issue, Member States could facilitate cross-border access by developing simplified authentication pathways for foreign users. ELA could take a role in this process, in line with its mandate to promote interoperability and disseminate good practices among the Member States. It can actively identify, analyse and promote successful authentication solutions, such as the Finnish Authenticator model, through its established platforms, including ELA market studies and the digitalisation knowledge hub. Furthermore, by facilitating this exchange of knowledge, ELA can support Member States in implementing more accessible cross-border systems. Where domestic registration remains necessary, Member States could streamline the registration process for PD A1 applicants specifically.

4. Address the digitalisation gap among the remaining non-portal countries.

While enhancing existing portals is critical for a majority of the national institutions observed, a more foundational challenge exists for the few Member States that lack basic online tools. For instance, 88 % of institutions operate online portals, yet four Member States (Cyprus, Greece, Iceland and Liechtenstein) still largely rely on email, post or other non-portal channels. These countries could develop basic online application systems, platform solutions or simplified portals that are appropriate for their relatively lower-issuance volumes. More concretely, this digitalisation gap could be addressed through the provision of targeted support through the ELA, in line with its mandate to build capacity and promote the use of digital tools. For instance, through its established initiatives such as the digitalisation knowledge hub, ELA could offer technical assistance and share good practices, or support study visits, allowing for the transfer of practical hands-on experience with the development of PD A1 portals by other countries with a similar national context. Even modest digitalisation would contribute towards more consistent service levels across the EU/EEA and is key to achieving efficiency gains and workload reductions for both applicants and institutions.

5. Improve data access and interinstitutional connectivity.

Developing these user-facing front-end portals (as per potential improvements 1–4 above) must be supported by sufficiently robust back-end integration in order to be fully effective. A key challenge identified is the heavy reliance observed among national institutions on applicant-provided declarations (rather than via automated register checks), which creates unnecessary workload and could lead to verification gaps. To address these issues, Member States could establish formal data-sharing agreements between social security institutions and tax/revenue authorities or other administrators of relevant national registers, along with developing the technical infrastructure required for real-time or near-real-time data queries (rather than retrospective access, as in the case of Belgium (RSVZ)). The analysis also revealed that 23 % of institutions check even basic data elements like period of coverage via applicant declarations, despite this information being available in administrative records. However, national institutions in Belgium (RSZ), Estonia and Slovakia demonstrate that automated register checks can reduce the prevalence of workload while improving accuracy.

([39]) The most recent call for good practices took place in 2025 – see ELA, 'Share your solutions: ELA's call for good practices 2025', ELA website, 27 March 2025, https://www.ela.europa.eu/en/news/share-your-solutions-elas-call-good-practices-2025.

6. Increase automation and interoperability with national registers.

Building on this interinstitutional connectivity, the next step could entail increasing the scope of automated processes. This study found that a higher prevalence of automated tools within issuing national institutions is associated with much faster processing times and a reduced institutional workload. Yet 38 % of national institutions still report no automation at all. Member States could expand automated verification by developing API connections to national revenue, tax and business registration databases, for example, and by implementing rules-based verification engines that mirror legal requirements. ELA is well positioned to facilitate this transition. Specifically, in line with its mandate to support cooperation and enhance capacity, ELA could promote the exchange of good practices and innovative digital solutions among Member States. The analysis carried out in this study also revealed the specific building blocks necessary for successful automation, including strong authentication, reuse and prefilling of data, legal rules engines, plausibility checks and overlap detection.

7. Clarify and harmonise the interpretation of the assessment criteria.

Finally, these technical and digital improvements (as per potential improvements 1–6 above) will only be fully effective if the underlying assessment criteria are applied consistently. Difficulties in legal interpretation were identified as a recurring issue among the observed national institutions, particularly with regard to ambiguous terms such as substantial activity (which is reportedly interpreted leniently by certain national institutions over others), approximately 25 % turnover and replacement ban. At the EU level, the Administrative Commission could provide more detailed interpretative guidance, including practical examples and thresholds where appropriate ([40]). To complement this, ELA should actively support the Administrative Commission and Member States by leveraging its mandate for capacity building. ELA could also facilitate dialogue on divergent national interpretations by arranging structured exchanges and peer-learning activities, thereby fostering a common understanding. Furthermore, ELA should continue to develop and promote its dedicated capacity-building tools, such as its cross-sectoral training programmes and the e-learning platform, which are specifically designed to help officials from national institutions navigate the complexities of EU labour mobility rules. These EU-level efforts should in turn be complemented by Member States developing clear national guidance documents that operationalise the common criteria within their own administrative contexts, supported by the exchange of good practices facilitated by the ELA.

7.4. Potential improvements on PD A1 control

Based on the analysis of Chapter 6 and the key findings identified therein, the following potential improvements to the PD A1 control system are proposed.

1. Strengthen PD A1 control mechanisms.

As an initial step, efforts could focus on limiting the reliance on applicants' declarations and strengthening systematic cross-checks of information provided by applicants against other data sources, preferably through established registers. Another key improvement could be in increasing automation of PD A1 controls (especially in those countries with a high volume of postings). Expanding the use of automated verification processes, such as red flagging tools, risk-based algorithms and interoperability with registers, could reduce reliance on manual procedures and increase the consistency and efficiency of both *ex ante* and *ex post* verifications. Lessons could be learned from existing national practices to inform potential developments via the exchange of good practices or study visits supported by the ELA.

2. Expand anti-fraud measures and risk detection.

National institutions could make greater use of advanced approaches (such as risk assessment models, algorithms and scripts) to improve the detection of suspicious patterns. Lessons can be learned from Member States' initiatives to inform similar developments in other countries. ELA database of good practices allows countries that have already developed such solutions to share their know-how, while enabling those planning to implement similar solutions to draw on the experience of those who have already done so. Through its regular technical and analytical workshops and events, ELA supports the development of analytical and risk assessment competencies and procedures in national authorities and fosters the exchange of knowledge about different systems and practices in Member States**.**

3. Improve interinstitutional cooperation on the national level.

Divided responsibilities between national institutions (e.g. social security institutions, labour inspectorates and tax authorities) often undermine overall effectiveness. Stronger coordination, more systematic data sharing and clearly defined responsibilities could help reduce information gaps and improve operational effectiveness.

([40]) This could be achieved within the ongoing process of revision of the Administrative Commission's Practical guide on the applicable legislation.

4. Strengthen cross-border cooperation (and digital) tools.

Success in preventing and combating (cross-border) fraud depends, to a large extent, on effective and efficient cooperation between Member States. This process could be supported by the cooperation activities facilitated by ELA (e.g. through bilateral and multilateral thematic meetings between Member States), which can be focused on optimising collaboration mechanisms and communication channels.

Reliance on the EESSI system could be complemented by broader use of online portals, QR code verification and interoperability between national registers to reduce asymmetries and increase trust between Member States. This includes the potential future EU-wide deployment of ESSPASS, which complements the EESSI system by facilitating interactions between mobile citizens and relevant public authorities, thereby enabling real-time verification, including for individuals without access to the EESSI system (e.g. labour inspectorates). In anticipation of the deployment of ESSPASS, one avenue could be to develop an EU-level centralised overview of Member States' online tools that enable real-time verification of PD A1 documents, whether QR code- or webform-based.

Additionally, automated triggering of EESSI notifications upon issuance of a PD A1 or any changes affecting it should be implemented as the most effective measure to eliminate clerical errors and delays. While this practice has been observed in several institutions, it is desirable to extend the interconnection of PD A1 issuance and EESSI exchanges across the entire EU to guarantee fully reliable and consistent EESSI data.

Member States could also be encouraged to adopt layered verification systems that integrate multiple tools for more robust control. Sharing cases of good practices and experiences could accelerate the adoption of these practices. In this context, countries that have already developed such solutions can share their know-how through ELA database of good practices, while countries planning to develop similar solutions can utilise the experience of those who have already implemented them. ELA also supports study visits, offering opportunities for more detailed and hands-on learning of these existing solutions.

5. Promote targeted awareness-raising measures.

Clearer guidance for users (i.e. undertakings, self-employed, employees) and targeted information and awareness-raising activities could help reduce administrative mistakes and increase the level of compliance, thereby addressing irregularities caused not by deliberate fraud but by the lack of understanding of the applicable criteria. This would also help foster a culture of compliance, ultimately reducing the workload on national (control) authorities. Good practice examples from Member States could provide valuable lessons for improving user guidance and communication.

6. Improve data collection on fraud and error.

Member States could make further efforts towards the systematic collection and centralisation of data on PD A1 fraud, contestations and withdrawals, along with dialogue and conciliation processes (in line with Decision A1([41]), point 19). Improved (and reliable) data should allow more accurate assessment of risks and inform targeted interventions and anti-fraud measures. A harmonised approach to data gathering would also facilitate comparability across Member States. This exercise could be supported by cooperation between ELA and the Administrative Committee's Steering Committee on Fraud and Error. Finally, while statistical collection inevitably requires some administrative effort, such efforts should be designed to minimise unnecessary workload as much as possible.

([41]) Decision No A1 of 12 June 2009 concerning the establishment of a dialogue and conciliation procedure concerning the validity of documents, the determination of the applicable legislation and the provision of benefits under Regulation (EC) No 883/2004 of the European Parliament and of the Council (OJ C 106, 24.4.2010, p. 3, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010D0424(01)

Annex I – List of questions (questionnaire and interview)

The following is the list of the questions asked in the questionnaire and the interviews for competent authorities. Interview questions are shaded.

Section 1 – General information

Question Text	Response Type
1. Please provide the following details for your institution:	**[Insert below]**
Official name of the institution:	[Insert text here]
Name and contact details of the primary contact person for the interview:	[To be prefilled]
Website address(es) where guidance on PD A1 applications can be found:	[Insert text here]
Website address(es) or portal URL(s) for submitting PD A1 applications:	[Insert text here]
2. For which categories does your institution issue PD A1 certificates? (Select 'Yes' to all that apply)	[Select Yes/No below only for those that apply]
Employed persons (Art. 12(1) Reg. 883/2004)	
Self-employed persons (Art. 12(2) Reg. 883/2004)	
Persons normally working in two or more Member States (Art. 13 Reg. 883/2004)	
Exceptions (Art. 16 Reg. 883/2004)	
All of the above	
Other (please specify)	[Please specify here]
3. Does your institution issue the majority of PD A1s under Art. 12(1)/(2) in your country (e.g., >60 %), or is responsibility shared with another institution(s)? (Yes/No)	
3.1. If no, please indicate the (other) main institution(s) and briefly describe their role.	[Insert text here]
4. Do you keep/have statistical data (e.g., monthly/annual) on the number of PD A1 certificates issued by your institution, specifically those issued based on Article 12(1) and/or Article 12(2) of Reg. 883/2004, going beyond those published by the Administrative Commission for the coordination of social security systems? (Yes/No)	
4.1. If yes, please provide them, if possible, for the years 2022, 2023 and 2024.	[please provide the data below for each year available]
2022 statistics	
2023 statistics	
2024 statistics	
4.2. Please provide, if publicly available, any weblink or publication reporting these statistics	[Insert text here]
5. Are there specific business sectors, professions, or types of economic activity for which your institution exclusively handles, or is excluded from handling, PD A1 applications related to posting under Art. 12? (Yes/No)	
5.1. If yes, please specify these inclusions/exclusions and briefly state the reason.	[Insert text here]

Section 2 – Digital tools used for application, issuance and delivery of PD A1 CERTIFICATES

Question Text	Response type
6. Does your institution operate or utilise an online portal or digital tool for receiving and/or processing PD A1 applications under Art. 12? (Yes/No)	
If Yes: Please proceed to Question 7.	
If No: Please answer questions 6.1 and 6.2 below (for the interview), then proceed to Section 3. If another department of your institution runs the portal please liaise with them to contribute to answering to the questionnaire. If this is not possible, please provide the relevant contact details on the cell on the right	
6.1. Could you please explain the main reasons why an online portal/tool for Art. 12 applications is not currently operated or utilised by your institution (e.g., portal is under development, technical limitations, responsibility assigned to a different institution)?	[Insert text here]
6.2. What is the current process for submitting Art. 12 applications (e.g., paper forms, email)? Select 'Yes' to all that apply)?	[Insert yes/no below for those that apply or not]
Applications are sent via standard email	
Applications are submitted by post	
Applications are submitted in paper form at competent offices	
Other (please specify)	[Please specify here]
6.3. Please elaborate on the current process in place.	
7. Regarding the primary online portal/tool used for Art. 12 applications, please provide the following details:	**[Insert below]**
Name of the portal/tool	
URL	
Is the online portal/tool part of a wider national administration or social security platform? (Yes / No)	
7.1 Is this tool also used for PD A1 applications in situations other than posting under Art. 12 (e.g., Art. 13 cross-border work, Art. 16 exceptions)? (Select 'Yes' to all that apply)	[Insert yes/no below for those that apply or not]
No, only Art. 12	
Yes, Art. 13 also	
Yes, Art. 16 also	
Yes, all situations (Art. 12, 13, 16)	
Other (please specify)	[Please specify here]
8. Who can access the PD A1 online portal or tool to initiate or manage an Art. 12 application (Select 'Yes' to all that apply)?	**[Insert yes/no below for those that apply or not]**
Employer (for Art. 12(1))	
Employee (for Art. 12(1))	
Self-employed person (for Art. 12(2))	
Other (please specify; e.g., specific professions or sectors?)	[Please specify here]
9. Who can submit a PD A1 application via the online tool? (Select 'Yes' to all that apply).	**[Insert yes/no below for those that apply or not]**
Employer (for Art. 12(1))	
Employee (for Art. 12(1))	
Self-employed person (for Art. 12(2))	
Other (please specify)	[Please specify here]
9.1 If 'Employer' is selected, what role, if any, does the employee have in the online process (e.g., requires employee consent, employee co-signs electronically, employee is notified but has no active role).	[Insert text here]
10. What authentication methods are required for accessing the portal? (Select 'Yes' to all that apply)	**[Insert yes/no below for those that apply or not]**
e-ID (national electronic identification)	
Bank ID systems	
Business registration number / Tax ID	
Username/Password created on the portal	

Other (please specify)	[Please specify here]
10.1 Does the chosen authentication method creates issues for businesses located outside the Member State?	[Insert text here]
11. Could you briefly describe the main steps an applicant follows within the online tool to submit a PD A1 application for posting? (For interview)	**[Insert text here]**
12. Is the entire application process, including the submission of supporting evidence and any required signatures, completed fully online via the tool? (Yes/No)	
12.1. If no, please describe which steps require offline action (e.g., paper-based submissions, post, signature; etc.)	[Insert text here]
13. How is the receipt of a submitted Art. 12 application acknowledged by the institution? (Select 'Yes' to all that apply)	**[Insert yes/no below for those that apply or not]**
Automatically generated message by the portal	
Automated email notification	
Secure email message	
Standard email message	
Postal letter	
No formal acknowledgement of receipt	
Other (please specify)	[Please specify here]
13.1. Is the application receipt provided immediately?	
13.2. What is the typical timeframe for acknowledgement of receipt? If applicable, please cite the specific legal provisions or regulatory instruments that establish the applicable timeframe.	[Insert text here]
14. How is the final decision (issued PD A1 or rejection notice) delivered? (Select 'Yes' to all that apply)	**[Insert yes/no below for those that apply or not]**
Electronically via the application portal	
Electronically via the secure email	
Electronically via standard email	
By post	
Other (please specify)	[Please specify here]
14.1. In what format is the PD A1 typically issued (e.g., PDF document, secure digital file, paper)?	[Insert text here]
14.2 To whom is it delivered? (Select 'Yes' to all that apply)	[Insert yes/no below for those that apply or not]
The applicant (Employer / Self-employed person)	
The employee (in case of Art. 12(1))	
Both employer and employee	
Third-party representative (if applicable)	
Other (please specify)	
15. Does the online portal/tool allow for the submission of retroactive PD A1 requests under Art. 12 (i.e., where the posting period has already commenced or concluded)? (Yes/No)	
15.1. If yes, are there specific conditions or limitations for retroactive requests?	[Insert text here]
16. Does the issuance procedure for a PD A1 under Art. 12 need to respect a specific maximum time limit? (Yes/No)	
16.1. If yes, what is the legally defined timeframe for issuing or rejecting a PD A1? Please cite the specific legal provisions or regulatory instruments if possible.	[Insert text here]
17. What is the average time (e.g., in working days, weeks) taken to process a complete PD A1 application for posting (Art. 12) from the date of submission to the date of decision (issuance or rejection)?	[Insert time estimates specifying if it is days, weeks, other]
18 If changes occur during the posting period that affect the PD A1 (e.g., change of duration, workplace), how should the applicant notify your institution? Can this notification be done using the online tool? (Open ended)	[Insert text here]
18.1. Does such notification result in the issuance of a new or amended PD A1 document? (Select the options in the dropdown list)	
19. Does the portal include any of the following user-friendly features and/or anti-forgery measures to facilitate Art. 12 applications? (Select 'Yes' to all that apply)	**[Insert yes/no below for those that apply or not]**
Bulk requests (submitting multiple applications simultaneously)	

Pre-filling of forms with applicant's data	
Automatic data upload from national registers	
QR code to verify authenticity	
Real-time application status tracking	
Multilingual interface support	
Integrated help functions or chatbots	
Other (please specify)	[Please specify here]
19.1. Please elaborate on your selection, describing the use of such instruments more in detail	
20. Does the tool interconnect with the EESSI (Electronic Exchange of Social Security Information) system? (Yes/No)	
20.1. If yes, please describe how the issuance of PD A1 triggers EESSI notifications (LA_BUC_04). Is this process automated?	[Insert text here]
21. Are there any statistics available on the use of the online tool for PD A1 applications under Art. 12(1) and/or Art. 12(2)? (Yes/No)	
21.1. If yes, please provide data on the following metrics, if available:	[Provide the metrics below]
Number of applications received via the tool	[Insert data here]
Number of applications deemed complete upon submission	[Insert data here]
Number of applications deemed incomplete (requiring further information)	[Insert data here]
Number of PD A1s issued (granted) from applications submitted via the tool	[Insert data here]
Number of applications rejected from applications submitted via the tool	[Insert data here]
21.2. What are the main reasons for rejecting PD A1 applications submitted via the tool?	[Insert text here]
21.3. Regarding contested PD A1s (Art. 12), please provide data on the following metrics below, if available:	[Provide the metrics below]
Number of contestations received annually against PD A1s issued by your institution	Please provide the most recent data indicating the year in brackets]
Number of PD A1s (issued by your institution) subsequently withdrawn following contestation	Please provide the most recent data indicating the year in brackets]
Number of contestations initiated annually against PD A1s issued by other Member States	Please provide the most recent data indicating the year in brackets]
21.4 Can a breakdown of these contestations/withdrawals by Member State be provided? (Yes/No)	
21.4 If yes please provide this breakdown	[Please provide the most recent data indicating the year in brackets]
22. Based on your experience with withdrawals (either of your own PD A1s or those from other MSs), what are the three most common grounds identified for withdrawal?	[Insert text here, listing the three main common grounds of withdrawal]
23. Are there specific statistics or data demonstrating the impact of the online tool on the efficiency/speed of the PD A1 issuance process compared to the practice before the tool was introduced? (Yes/No)	
23.1. If yes, please provide data/references.	[Please provide the most recent data indicating the year in brackets]
24. To what extent is the assessment and issuance process for Art. 12 PD A1s automated or does it utilise robotization within your institution/tool? (Please select the level that best applies using the options in the dropdown list)	
24.1. If 'Limited extent, 'Moderate extent', or 'High extent', is selected, please specify if algorithms are used as part of this automation/robotization to check particular posting prerequisites. If yes, please briefly describe which prerequisites are checked algorithmically.	[Insert text here]
25. If PD A1 issuance involves automation, what is the approximate proportion (in %) of Art. 12 attestations issued with human intervention versus without human intervention (fully automated)? Please explain. (make this a follow-up) Q25.1	[Insert text here]

25.1 Please further elaborate on this assessment.	[Insert text here]
26. Are there any other particularly innovative elements included in the online tool/ portal for Art. 12 applications not mentioned elsewhere (e.g. AI analysis, data analysis/mining, interconnection with other databases etc.)? (Yes/No)	
26.1. If yes, please explain.	[Insert text here]
27. Does your institution include a feature or webform enabling the verification of the authenticity and validity of the PD A1 issued? (Yes/No)	

Section 3A – Grounds of assessment analysis – employees

28. Please complete the table below by indicating, for each ground of assessment used to issue PD A1, whether the listed data elements are: > checked ex-ante (before issuance), ex-post (after issuance), or not used; and > the source of information used (e.g. applicant, register, other authority).	
Ground of assessment	**Data element**
Country where worker is posted	Name of 'host'/'receiving' country where worker is posted
Other details related to the place of work in the host/receiving country	e.g. city, address of business activity, etc.
Duration of posting	Start and end date of posting
	Previous posting periods of the person and gaps
Prior affiliation	Period of coverage under posting state legislation
	Details of activity prior to posting
	Nature of activity in posting and receiving states
Substantial activity of the posting company in the country of establishment/sending country	Location of company registered office and administration
	Number of administrative staff in posting and receiving Member States
	Number of non-administrative staff in posting and receiving Member States
	Number of posted employees
	Place of recruitment of posted worker
	Place where contracts with clients are concluded
	Law applicable to contracts with clients and workers
	Number of contracts executed in posting and receiving state
	Turnover in posting and receiving state (%)
	Length of time company is established in posting state
Direct relationship	Responsibility for recruitment
	Company concluding employment contract and its duration
	Power to terminate contract (dismissal)
	Power to determine nature of work
	Obligation to pay remuneration
	Power to impose disciplinary actions
	Worker placed at disposal of another undertaking
Replacement ban	Workers previously posted to the receiving undertaking
	If replacement, why deemed necessary
Specific requirements for TWAs based in the posting state	Proportion of workers placed in posting state vs other states
Other facts or circumstances	[Please indicate further fact and circumstances here]

If other facts or circumstances are selected, please further elaborate on them and their importance in the grounds of assessment evaluation.	[Insert text here]
29. Does your institution encounter significant issues or difficulties with collecting or assessing any of the data elements listed above? (Yes/No)	
29.1. If yes, please describe any legal interpretation challenges encountered.	[Insert text here]
29.2. If yes, please describe any practical problems with data collection (e.g. lack of access to other authorities' registers or need to handle substantial supporting evidence)	[Insert text here]
29.3. If yes, please describe any operational or technical problems with assessment (e.g. allocation of employer's turnover between MSs in case of cross-border services).	[Insert text here]

Section 3B – Grounds of assessment analysis – self-employed

28. Please complete the table below by indicating, for each ground of assessment used to issue PD A1, whether the listed data elements are: > checked ex-ante (before issuance), ex-post (after issuance), or not used; and > the source of information used (e.g. applicant, register, other authority).	
Ground of assessment	**Data element**
Country where self-employed is posted	Name of 'host'/'receiving' country where self-employed is posted
Other details related to the place of work in the host/receiving country	e.g. city, address of business activity, etc.
Duration of posting	Start and end date of posting
	Previous posting periods and gaps
Normally self-employed in posting state – Prior pursue of activity	Period of self-employment in posting state
Necessary business requirement	Maintaining an office in posting state
	Taxation in posting state
	Maintaining VAT number in posting state
	Registration with chambers or professional bodies in posting state
	Possession of a professional card in posting state
Similar activity in host MS	Nature of activity in posting and receiving states
Other facts or circumstances	[Please indicate further fact and circumstances here]
If other facts or circumstances are selected, please further elaborate on them and their importance in the grounds of assessment evaluation.	[Insert text here]
29. Does your institution encounter significant issues or difficulties with collecting or assessing any of the data elements listed above? (Yes/No)	
29.1. If yes, please describe any legal interpretation challenges encountered.	[Insert text here]
29.2. If yes, please describe any practical problems with data collection (e.g. lack of access to other authorities' registers or need to handle substantial supporting evidence)	[Insert text here]
29.3. If yes, please describe any operational or technical problems with assessment (e.g. allocation of employer's turnover between MSs in case of cross-border services).	[Insert text here]

Section 4 – Verification and anti-fraud mechanisms

Question Text	Response Type
30. Does your institution carry out systematic ex-ante verification of the information or documents submitted by the claimant in PD A1 applications (i.e. checks performed before issuance of PD A1)? (Yes/No)	
30.1. If yes, indicate which methods are typically used for ex-ante verification: (Tick all that apply)	[Insert yes/no below for those that apply or not]
Cross-check of information provided by the applicant with internal (own) registers/databases* (**Only applicable if supporting evidence is provided by the applicant*)	
Cross-check of information provided by the applicant with external national registers/databases* (**Only applicable if supporting evidence is provided by the applicant*)	
Requesting original or certified (paper) documents	
Automated red flag systems	
Risk assessment tools	
Other (please specify)	[Please specify here]
30.2. If information is cross-checked with registers/databases (internal or external), to what extent is this process automated/robotised? (Select the options in the dropdown list)	
30.3 If automated red flag systems, risk assessment and other tools have been selected, please elaborate on their functioning and use in the verification process.	
31 Does your institution carry out ex-post controls on PD A1s issued under Art. 12? (Yes/No)	
31.1 If Yes, who is performing these ex-post controls? (labour inspectorates, social security officials, social partners, etc.)	[Insert text here]
31.2. If yes, please indicate the nature of these ex-post controls: (Tick all that apply)	[Insert yes/no below for those that apply or not]
Reactive: Triggered by external requests (e.g., contestation from host MS institution, complaints)	
Proactive: Conducted based on the institution's own initiative (e.g., risk-based selection, random checks, specific control programmes)	
Both reactive and proactive	
31.3. Please elaborate on your selection, describing how your organisation reacts to contestation (e.g. By conducting standardised investigation, ad-hoc inspection procedures) and what steps are taken to re-assess the PD A1 based on the contestation received.	[Insert text here]
32. What tools do you use to verify the authenticity of PD A1 documents issued in another Member State? (Select 'Yes' to all that apply)	**[Insert yes/no below for those that apply or not]**
EESSI system (Electronic Exchange of Social Security Information)	
Online verification portal / webform provided by the issuing Member State	
Direct exchange with issuing institution in sending Member State (through IMI, email contact, etc.)	
QR code verification linked to an online system	
Access to the social security register of the issuing Member State	
Manual verification via official channels (e.g., secure email, administrative cooperation platforms)	
Automated inter-institutional exchange tools integrated in your national system	
Third-party verification service (please specify)	
Other (please specify)	[Please specify here]
32.1. Please elaborate on what is selected above, describing their functioning and use	
33. Does your institution employ any of the following specific measures primarily aimed at detecting or preventing fraud in the context of Art. 12 PD A1 applications/issuance? (Select 'Yes' to all that apply)	**[Insert yes/no below for those that apply or not]**
Data matching with other registers	
Risk assessment models / fraud risk profiling	
Algorithms / automated risk indicators	
Cross-border data exchange (used specifically for fraud detection or verification purposes)	
Scripts identifying suspicious patterns	
Other (please specify)	[Please specify here]

33.1. If any of the above measures are selected, could you briefly elaborate on how they function or are applied in practice.	[Insert text here]
34. Based on your experience, how would you assess the effectiveness of these anti-fraud measures? (Select the options in the dropdown list)	
34.1. Please elaborate on your assessment (e.g. considering their impact on fraud detection, increased compliance, efficiency, cross-border applicability)	[Insert text here]
35. Have you recorded any statistics on fraud detected in the context of PD A1 applications, specifically those issued on the basis of Article 12 (1) and/or 12 (2) Reg. 883/2004? (Yes / No)	
35.1. If yes, please provide them.	[Please provide the most recent data indicating the year in brackets]
35.2. Please provide, if publicly available, any weblink or publication reporting these statistics.	[Insert text here]
35.3 If possible, please indicate which posting conditions are the main cause of non-compliance.	[Insert text here]
36. Has your institution implemented any specific innovations or developed particular good practices regarding the inspection and verification of PD A1s for posting (Art. 12) that you consider noteworthy? (Yes / No)	
36.1. If yes, please describe these. Where available, please provide supporting information (e.g., statistics demonstrating impact, references to studies or evaluations).	[Insert text here]

Section 5 – Experience and good practices

Question Text	Response Type
37. What are the main challenges your institution faces in processing PD A1 applications and managing the related procedures under Art. 12?	[Please insert text here]
38. How would you assess the level of administrative burden associated with the PD A1 process in your Member State, considering both the scope of information required for the assessment (See Section 3 of the questionnaire) and the methods of processing this information (manual vs. automated)?	
Please answer separately for each of the following:	
a) Administrative burden on competent institutions (e.g. workload, processing complexity) (Select the options in the dropdown list):	
Please explain briefly:	[Please insert text here]
b) From your perspective, what is the level of administrative burden on applicants (employers/self-employed/employees submitting Art. 12 requests) (e.g. documentation required, system complexity, time investment) (Select the options in the dropdown list):	
Please explain briefly:	[Please insert text here]
39. In your opinion, what improvements could be made at the national or EU level to improve PD A1 issuance (including verification of reliability of submitted data)?	[Please insert text here]
40. In your opinion, what improvements could be made at the national or EU level to improve PD A1 control in the receiving Member States? (open-ended)	[Please insert text here]
41. Would your institution be interested in sharing experiences or good practices regarding PD A1 issuance and control with other Member States in the future? (Yes/No)	
41.1. If yes, please provide your contact details for follow-up.	[Please insert text here]

Annex II – Ultimate Digital_Tools_Inventory

Austria (SVS)

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Austria
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Sozialversicherungsanstaltung (SVS)
Q. 7	**Name of the online portal/tool for PD A1 applications**	Website of the SVS
Q. 7	**URL or public access path**	https://www.svs.at/cdscontent/?contentid=10007.816700&portal=svsportal
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12(2)
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	Austria ID
		Manually
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Self-employed persons
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Self-employed persons
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Only if the self-employed person has Austria ID, otherwise he/she has to sign the document manually. However, the conditions of Art 12(2) are always verified manually.
Q. 12.1	**If not, steps that require offline action**	If the self-employed person does not have Austria ID, he/she has to print the document, sign it manually and send it by post
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	The self-employed person first receives an acknowledgment of receipt confirming that the application has been submitted with legal effect – this is sent out immediately.

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	By post or eletronically via standard email
Q. 14.1	**Format through which the PD A1 is issued**	Typically by post, only exceptionally by PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Self-employed person
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	No, but usually the process takes 5-10 working days
Q. 17	**Average processing time (in days)**	5-10 working days
Q. 18	**Notification of changes and amended PD A1 process**	The self-employed person is required to register and notify the changes. On the A009-form, the changes will be indicated and the social security institution in the other Member State will be informed through EESSI about the changes in the A009-form
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	No
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	Not automated at all
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	N/A
Q. 26	**Innovative features not covered elsewhere**	No
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	The tool is not interconnected with EESSI
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	No
Q. 17	**Observed impacts (efficiency, speed)**	Application processing is comprised between 5 to 10 working days

Austria (ÖGK)

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Austria
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Österreichische Gesundheitskasse (ÖGK)
Q. 7	**Name of the online portal/tool for PD A1 applications**	ELDA
Q. 7	**URL or public access path**	www.elda.at
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)
		Username/Password created on the portal
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12)
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	It is an automatically generated message by the portal, immediately
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employer
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	No
Q. 17	**Average processing time (in days)**	1 hour
Q. 18	**Notification of changes and amended PD A1 process**	The employer will inform the ÖGK about the changes. The PD A1 will then be cancelled and a new one will be issued.
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Real-time application status tracking
		Multilingual interface support
		Integrated help functions or chatbots

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a high extent. The issuance of the A1 certificate is now fully automated. The current system has reached its technical limits. However, algorithms are not particularly suitable in this case.In the future, the introduction of the ESSPASS is planned.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	98%
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	Yes, the tool is interconnected with EESSI
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	N/A
Q. 17	**Observed impacts (efficiency, speed)**	1 hour average processing time

Belgium (RSVZ)

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Belgium
Q. 1 & Q. 6	**Official name of the institution managing the tool**	National Institute for the Social Security of the Self-employed - L'Institut national d'assurances sociales pour travailleurs indépendants (INASTI) - Rijksinstituut voor de Sociale Verzekeringen der Zelfstandigen (RSVZ)
Q. 7	**Name of the online portal/tool for PD A1 applications**	Demande d'attestation A1 pour un indépendant - Aanvraag A1-attest voor zelfstandige
Q. 7	**URL or public access path**	https://www.socialsecurity.be/site_fr/employer/applics/rsvz_A1/index.htm
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art.12
		Art.13
		Art.16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Self-employed
		Representative

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Self-employed
		Representative
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal - Upon submission, the applicant immediately receives a notification confirming successful submission.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via standard email
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Self-employed - Third-party representative
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	Internal guideline of 7 days
Q. 17	**Average processing time (in days)**	1-2 days
Q. 18	**Notification of changes and amended PD A1 process**	Applicants cannot modify an existing A1 online; they must submit a new A1 application
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Automatic data upload from national registers
		Multilingual interface support
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a high extent. In the process, the organisation systematically verifies declarations of self employment. The affiliation status is checked: for instance, if someone applies for a two month posting, the organisation verifies whether the person has been affiliated for two months. If the person declares salaried status, that too is verified. Approval is therefore not automatic, as manual review remains necessary. These checks, however, are supported by automated systems, which allow to confirm whether an individual is registered as a salaried worker or a civil servant. The main variables assessed are the relevant dates and the declared employment status.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	N/A
Q. 26	**Innovative features not covered elsewhere**	Repeated or excessive postings trigger manual review. For example, if someone has already received three refusals and keeps adjusting their application to meet conditions (e.g., by modifying their percentage of simultaneous employment), the case is flagged for manual scrutiny.

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	Yes. A message is automatically transmitted to Member State X indicating that the individual remains under Belgian legislation. If this is processed manually, the same procedure applies, with the relevant information transferred from the A1 to the EESSI dataset. If an individual merely requests a decision on applicable legislation (without requesting an A1), a message is also transmitted through EESSI.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	N/A
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Number of applications received via the tool:17121 /// Number of applications deemed complete upon submission:7055 /// Number of applications deemed incomplete (requiring further information): 2065 /// Number of PD A1s issued (granted) from applications submitted via the tool for all A1 mentioned above: 10576 /// Number of applications rejected from applications submitted via the tool: for all a1 types: 3229, of which 2266 A1 3.3 automatically rejected
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Belgium (RSZ)

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Belgium
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Office national de securité sociale (ONSS) - Rijksdienst voor Sociale Zekerheid (RSZ)
Q. 7	**Name of the online portal/tool for PD A1 applications**	Working Abroad (Wabro)
Q. 7	**URL or public access path**	https://settlinginbelgium.be/en/do-business/working-abroad
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art.12
		Art.13
		Art.16
		Certificates of Coverage based on bilateral agreements with non EU countries
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)
		Bank ID systems (Itsme)
		CSAM that combines the systems above with EIDAS

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Representatives/social secretariat in all sectors
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Representatives/social secretariat in all sectors
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Immediate automated message by the portal at the end of the application proces that they can download
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal // By post // Through the E-box portal (Electronic mailbox system for Civilians, Employers and Representatives)
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employer // Employee (Only and always for a rejection in case they don't have an active E-box available) // Only to the employee and by post if it's a civil servant
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	Yes, 20 working days
Q. 17	**Average processing time (in days)**	12-24 hours if there are no issues // Most cases within 1-3 working days
Q. 18	**Notification of changes and amended PD A1 process**	A new application can always be submitted, and when overlaps occur, they are processed, and a file manager ensures the information is updated correctly.
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Automatic data upload from national registers
		Real-time application status tracking
		Multilingual interface support
		Integrated help functions or chatbots
		Although they don't do bulk requests, the option is given to repeat the same application for another person or for the same

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a high extent. Approximately 80.1% of decisions are fully automated via the portal. Due to access requirements and extensive existing data in Belgian databases, automation is highly effective. For example, employers must submit a valid DIMONA; otherwise, the application cannot be processed. If an error is detected, the organisation notifies the employer, who must correct the DIMONA before reapplying. Experienced employers have learned to comply with these requirements. If information is provided accurately and the relevant countries are indicated, the system makes the decision automatically. Incorrect information leads to incorrect decisions, but this risk lies with the employer, as a case manager would likewise rely on the provided data. This high level of automation allows the organisation to manage increasing volumes of applications with a relatively small team.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	80,1% is fully automated
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	Yes, the issuance of an A1 automatically results in an EESSI notification.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	N/A
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Number of applications received via the tool: 90121 - Number of applications deemed complete upon submission: all (not possible to submit an incomplete application) - Number of applications deemed incomplete (requiring further information): 0 - Number of PD A1s issued (granted) from applications submitted via the tool: 85739- Number of applications rejected from applications submitted via the tool: 4335
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Bulgaria

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Bulgaria
Q. 1 & Q. 6	**Official name of the institution managing the tool**	National Revenue Agency (Национална агенция за приходите)
Q. 7	**Name of the online portal/tool for PD A1 applications**	Портал за електронни услуги на НАП
Q. 7	**URL or public access path**	https://portal.nra.bg/details/notice-okd240
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art.11
		Art.12
		Art.13

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)
		Business registration number / Tax ID
		Personal Identification Code (PIC), issued by NRA and a Qualified Elecronic Signature (QES),issued by any Certification Service Providers
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Employee
		Self-employed
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Employee
		Self-employed
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	Only in case the supporting documents are not attached when the application is submitted online, or if any additional documents are required.
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	The acknowledgement of receipt contains the following information: Provider of electronic administrative services; Unique register identifier of the received document; Type of transfer; Applicant of the electronic administrative service; Submitted document; Author; Method of submitting the document; Serial number of the author's electronic certificate; Certification Services Provider; The registration is performed by; Time of creating the message; Territorial structure of the NRA; Information for accessing the received document;]
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Handing over personally to the applicant or to a person authorised by him in an office of the NRA.
Q. 14.1	**Format through which the PD A1 is issued**	The system creates a PDF file which is printed out in paper form.
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	employer, employee, self-employed, third person, authorised by them
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	According to Art. 90, para. 2 of the Tax Insurance Procedure Code, any certificate referring to the legislation in the field of social security is issued within 30 days of receipt of the application. When the application is submitted via another territorial directorate, the document is issued within 45 days from the date of the application.
Q. 17	**Average processing time (in days)**	30

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 18	**Notification of changes and amended PD A1 process**	In the event of any change in declared circumstances, the applicant must immediately notify the administration of the changes that have occurred, and the notification cannot be made through the NRA's electronic service.
Q. 19	**User-friendliness features (bulk submission, prefill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Authomatic data upload from the national registers
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	No automation
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	N/A
Q. 26	**Innovative features not covered elsewhere**	No
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	No
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Number of applications received via the tool - 5327 for 2024 (the only available data)
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Czech Republic

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Czech Republic
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Česká správa sociálního zabezpečení (ČSSZ), Czech Social Security Authority
Q. 7	**Name of the online portal/tool for PD A1 applications**	ePortál ČSSZ, in English CSSA ePortal
Q. 7	**URL or public access path**	https://eportal.cssz.cz/web/portal-en
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
		Request for exception under the Framework Agreement on application of Article 16(1) of Regulation (EC) No. 883/2004 in cases of habitual cross-border telework + Request under bilateral Agreements on social security

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)
		Bank ID systems
		eGovernment mobile key, IIG – International ID Gateway, data box (an electronic storage space used for delivering documents to and from state authorities and private entities, operating with verification of the identity of the box owner)
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Employee (for Art. 12(1))
		Self-employed person (for Art. 12(2))
		an agent hereof, eg. Attorney at law etc.
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Employee (for Art. 12(1))
		Self-employed person (for Art. 12(2))
		An agent hereof, eg. Attorney at law etc.
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal, Automated email notification, Postal letter
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal, By post, By a databox
Q. 14.1	**Format through which the PD A1 is issued**	PDF document (delivered via data box or as the digital file via the ePortal).
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employer / Self-employed person, employee
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	Yes, Decision of the institution must be made within 30 days, in complicated cases 60 days at the maximum. Based on the legislation: [§ 71 of the Czech Administrative Code]
Q. 17	**Average processing time (in days)**	15 days
Q. 18	**Notification of changes and amended PD A1 process**	No on-line application for that. Information may be sent electronically via a data box or a secured e-mail, or by a letter
Q. 19	**User-friendliness features (bulk submission, prefill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Automatic data upload from national registers
		Real-time application status tracking
		Multilingual interface support
		Integrated help functions or chatbots
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	Not automated at all. Partial automation is planned for Dec.2025. Now, the answer is none.

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	There are no fully automated processes within issuance of PD A1 and it is impossible to describe the scope of automated processes for issuance of Art. 12 PD A1 – of course, we have introduced some, as for the number of applications and benefits only automation is the option. Processing time has shortened and we continue with further integration and automation.
Q. 26	**Innovative features not covered elsewhere**	No other particularly innovative elements
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	No interconnection and automated LA_BUC_04 triggering (if present)
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	No
Q. 17	**Observed impacts (efficiency, speed)**	15 days. ČSSZ is preparing new solution for statistics and monitoring in 2026.

Cyprus

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	CYPRUS
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Social Insurance Services (Υπηρεσίες Κοινωνικών Ασφαλίσεων)
Q. 7	**Name of the online portal/tool for PD A1 applications**	No portal
Q. 7	**URL or public access path**	N/A
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	N/A
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	N/A
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	N/A

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	N/A
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	N/A
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	No
Q. 12.1	**If not, steps that require offline action**	APPLICATION PROCESSED MANUALLY
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	N/A
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	N/A
Q. 14.1	**Format through which the PD A1 is issued**	N/A
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	N/A
Q. 15	**Retroactive applications allowed (Yes/No)**	N/A
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	N/A
Q. 17	**Average processing time (in days)**	N/A
Q. 18	**Notification of changes and amended PD A1 process**	N/A
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	N/A
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	N/A
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	N/A
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	N/A
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	N/A
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	N/A
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Germany (ABV)

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Germany
Q. 1 & Q. 6	**Official name of the institution managing the tool**	ITSG GmbH
Q. 7	**Name of the online portal/tool for PD A1 applications**	SV-Meldeportal
Q. 7	**URL or public access path**	https://www.sv-meldeportal.de
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	BundID
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers,
		Employees
		Self-employed
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers,
		Employees
		Self-employed
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Portal
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Portal
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Applicant (employer, employee, self-employed)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	If it is determined that German social security legislation applies, the A1 certificate must be made electronically available to the person within three working days. § 106 (1) SGB IV, § 106a (1) SGB IV.

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 17	**Average processing time (in days)**	N/A
Q. 18	**Notification of changes and amended PD A1 process**	Yes
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Integrated help functions or chatbots
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a moderate extent (some human intervention required). See here (https://www.gkv-datenaustausch.de/arbeitgeber/a1_entsendung/entsendung_a1.jsp) under the file 'A1 XML Schemata'. The documents in this folder describe what is automatically checked and what has to be checked by competent institutions themselves as all error codes that are structured in the form of 'DX…' and do not include an 'e', 'v' or an 'x' are checked automatically.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	0% (All PD A1s are issued with human intervention)
Q. 26	**Innovative features not covered elsewhere**	No
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	No
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	(Metrics from 01.01.2024 till today (22.07.2025) - Number of applications received via the tool: 22955 - Number of PD A1s issued (granted) from applications submitted via the tool: 22854 - Number of applications rejected from applications submitted via the tool: 101
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Germany (AOK)

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Deutschland
Q. 1 & Q. 6	**Official name of the institution managing the tool**	AOK Baden-Württemberg/AOK-Bundesverband
Q. 7	**Name of the online portal/tool for PD A1 applications**	a) electronic application and certification procedure via the payroll programs of employers, tax advisors, and service providers b) filling aid, e.g., social security reporting portal
Q. 7	**URL or public access path**	a) https://www.gkv-datenaustausch.de/arbeitgeber/a1_entsendung/entsendung_a1.jsp b) https://info.sv-meldeportal.de/
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 11
		Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	a) Registration in the system-tested payroll accounting programme b) the ELSTER organization certificate or BundId with user name and password, private ELSTER certificate, online ID card or EU identity is currently offered as authentication
		Business registration number / Tax ID
		Username/Password created on the portal
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Self-employed person (for Art. 12(2))
		Authorized tax consultants or service providers
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Self-employed person (for Art. 12(2))
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal
Q. 14.1	**Format through which the PD A1 is issued**	PDF-Document
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	The applicant (Employer / Self-employed person)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	Upon determining that the German social security laws apply, the transmission of the A1 certificate data will take place within three working days by transmitting the data to the employer or self-employed person (§ 106 para. 1 SGB IV and § 106a para. 1 SGB IV).
Q. 17	**Average processing time (in days)**	2 working days
Q. 18	**Notification of changes and amended PD A1 process**	

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Integrated help functions or chatbots
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a moderate extent (some human intervention required). All prerequisites for the issuance of an A1 certificate are checked based on the information in the application and the available inventory data (plausibility and inventory checks).
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	40%
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	After the creation of the A1 certificate, a LA_BUC_04 is triggered simultaneously.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	No
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Germany (Pension Insurance))

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Germany
Q. 1 & Q. 6	**Official name of the institution managing the tool**	DRV Bund / ITSG
Q. 7	**Name of the online portal/tool for PD A1 applications**	SV-Meldeportal
Q. 7	**URL or public access path**	https://info.sv-meldeportal.de
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 11
		Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	Business registration number / Tax ID
		Username/Password created on the portal
		ELSTER organization certificate

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Self-employed person (for Art. 12(2))
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Self-employed person (for Art. 12(2))
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	No - but in cases of posting (Art. 12) the electronic application is sufficient. Based of the answers, the decision for A1 can be made.
Q. 12.1	**If not, steps that require offline action**	Does not apply to Art. 12 cases (for which the DRV is responsible).
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Method: automatically generated message by the portal, Timeframe: immediately, Information: available on the website of the GKV-Spitzenverband https://www.gkv-datenaustausch.de/media/dokumente/arbeitgeber/entsendung_a1/106/grundsaetze_9/Anlage_9_-_Antragsbestaetigung_ab_01012025.pdf
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	the applicant
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	If it is determined that German Social Security legislation applies, the A1 certificate must be made available electronically to the person within three working days (§ 106 (1) SGB IV, § 106a (1) SGB IV).
Q. 17	**Average processing time (in days)**	Automated processing: immidiately, Processing by clerk: 10 days
Q. 18	**Notification of changes and amended PD A1 process**	Cancellation (Storno) of the former application and a new application via “SV-Meldeportal” for a correct A1 document
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant’s data
		Integrated help functions or chatbots
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a high extent (little to no human intervention required). The A1 application goes through a sequence of logic checks in the automated procedures of the DRV, which checks the requirements for posting within the meaning of Art. 12 (1) and Art. 12 (2) Reg. (EC) No. 883/2004.

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	80%
Q. 26	**Innovative features not covered elsewhere**	No
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	As the "SV-Meldeportal" is a platform for applicants, there is no connection between the "SV-Meldeportal" and EESSI. When the DRV sends the applicant the A1 approval via the "SV-Meldeportal", the notification for the foreign institution (LA_BUC_04) is automatically generated and sent via EESSI at the same time.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Number of applications received via the tool: 71344 Number of applications deemed complete upon submission: 71344 Number of PD A1s issued (granted) from applications submitted via the tool: 68444 Number of applications rejected from applications submitted via the tool: 2567
Q. 17	**Observed impacts (efficiency, speed)**	no paper applications means significantly shorter processing times

Denmark

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Denmark
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Udbetaling Danmark
Q. 7	**Name of the online portal/tool for PD A1 applications**	ATP frontend services
Q. 7	**URL or public access path**	Introduction - Apply for social security cover when working abroad – as employee | Business in Denmark
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Employees
		Self-employed

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Employees
		Self-employed
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Instant automated confirmation upon submission, copy of the application
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the secure email By post
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Both
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	N/A
Q. 17	**Average processing time (in days)**	16 working days
Q. 18	**Notification of changes and amended PD A1 process**	If changes occur during the posting period, the applicant must notify the institution by phone, email, or secure mail. This can be done by the applicant, the employee, or the employer, there are no restrictions on who initiates the contact. Depending on the nature of the changes, the notification may result in the issuance of a new PD A1.
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	No
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a moderate extent (some human intervention required). While the case processing itself is largely automated, some human intervention is still required. Specifically, caseworkers must manually verify information with the system of the Danish Tax Ministry. Since this external system is not integrated into Udbetaling Danmark's digital infrastructure, the check cannot be automated. Once the verification is completed and confirmed to match the provided data, the caseworker must manually validate the application before finalisation.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	95% automated
Q. 26	**Innovative features not covered elsewhere**	No
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	The portal itself doesn't trigger EESSI notifications, but the underlying system engine does. For Article 12 and 13 cases, messages like LA_BUC_04 are sent automatically through EESSI.

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Received: 10.863 Issued: 10.863
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Estonia

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Estonia
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Estonian Social Insurance Board (in Estonian: Sotsiaalkindlustusamet)
Q. 7	**Name of the online portal/tool for PD A1 applications**	Estonian State Portal
Q. 7	**URL or public access path**	www.eesti.ee
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art.13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID
		Mobile-ID
		Smart ID
		EU e-ID
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Employee
		Self-employed person
		National public sector institutions
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Employee
		Self-employed person
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically and instantly generated message by the portal

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via application portal or electronically via standard email, with the decision document encrypted using the applicant's Estonian ID-card to ensure confidentiality. The encryption is performed using the DigiDoc software, ensuring that only the intended recipient can decrypt and access the document using their ID-card or by post.
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Recepient is the applicant. If employer, then the employee has access to all PD A1 certificates issued in her/his name through the State Portal eesti.ee, where he/she can view and download them.
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	There is no specific national sectoral legislation regulating the issuance of PD A1. The procedure follows the general rules set out in the Administrative Procedure Act. An administrative decision shall be made within thirty calendar days from the receipt of the application, unless otherwise provided by law.
Q. 17	**Average processing time (in days)**	5
Q. 18	**Notification of changes and amended PD A1 process**	Notification is done by submitting an application in the portal with explanation. Social Insurance Board decides if the PD A1 should be cancelled from certain date or revoked. There is no amended PD A1 issued, this is issued only when there is new application.
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filled forms
		Automatic data upload from national registers
		Real time application tracker
		Multilingual interface support
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	Not automated at all
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	N/A
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	N/A
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	No data collected
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Greece

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Greece
Q. 1 & Q. 6	**Official name of the institution managing the tool**	e-EFKA
Q. 7	**Name of the online portal/tool for PD A1 applications**	N/A

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 7	**URL or public access path**	N/A
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	N/A
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	N/A
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	N/A
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	N/A
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	N/A
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	N/A
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1 & Q. 13.2	**Acknowledgement of receipt: method and time-frame**	N/A
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	N/A
Q. 14.1	**Format through which the PD A1 is issued**	N/A
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	N/A
Q. 15	**Retroactive applications allowed (Yes/No)**	N/A
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	N/A
Q. 17	**Average processing time (in days)**	N/A
Q. 18	**Notification of changes and amended PD A1 process**	N/A

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	N/A
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	N/A
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	N/A
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	N/A
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	N/A
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	N/A
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Spain

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Spain
Q. 1 & Q. 6	**Official name of the institution managing the tool**	General Treasury of Social Security
Q. 7	**Name of the online portal/tool for PD A1 applications**	RED system and Social Security Electronic Headquarters
Q. 7	**URL or public access path**	RED
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID
		Username/Password created on the portal
		Cl@ve permanente

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Self-employed person
		Third parties on behalf of the company or the self-employed worker
		Employee if electronic headquaters used
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Self-employed person
		Third parties on behalf of the company or the self-employed worker
		Employee if electronic headquaters used
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal or automated email notification. It includes a summary of the data provided. Then, a notice is given stating that the PD A1 will be correctly issued and includes the link where it can be checked.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Both employer and employee
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	No
Q. 17	**Average processing time (in days)**	2 days (48 hours)
Q. 18	**Notification of changes and amended PD A1 process**	Notification is made through the electronic headquarters, where there is a service for notifying changes. The process is handled by civil servants, and a new A1 is issued with the correct situation.
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Automatic data upload from national registers
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a moderate extent (some human intervention required). 25% of processes involve human intervention (electronic headquarters) and 75% are handled automatically (RED system). The transition to ESSSI is mostly automatic, with manual handling only in cases of incidents.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	75%
Q. 26	**Innovative features not covered elsewhere**	No

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	When the PD A1 is issued, all issued forms are compiled into a database. This database automatically collects all the PD A1s, transmits the data to GINA as well as the annexes, and notifies the country where the worker is going. In some more complex cases, notifications are made manually.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	EESSI system. Direct exchange with the issuing institution of the sending Member State. Manual verification through official channels. CEA Code.
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	211209 issued in 2024, 172006 in 2023, 155728 in 2022
Q. 17	**Observed impacts (efficiency, speed)**	PD A1s can be issued within 24 hours via the network system and within 48 hours via the electronic headquarters, both to the company and the worker, and communicated to the destination country within the same time frame.

Finland

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Finland
Q. 1 & Q. 6	**Official name of the institution managing the tool**	The Finnish Centre for Pensions (Eläketurvakeskus, ETK)
Q. 7	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Finnish Centre for Pensions' eServices (Sähköinen hakemuspalvelu)
Q. 7	**URL or public access path**	https://asiointi.etk.fi/
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12.1 and 12.2
		Art. 13
		Art. 16
		Art. 11
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID
		Bank ID systems
		Business registration number
		Finnish Authenticator
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Self-employed
		Employees (only in article 13 situations)

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Self-employed
		Employees (only in article 13 situations)
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	When a person submits an application through the eService portal, an automated pop-up will appear thanking the applicant for the application and informing that the processing stage of the application can be tracked from the services' homepage. A pending status certificate may also downloaded from the service. Finally, the service will inform the person that ETK will notify the applicant once the application has been issued.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal. The applicant may choose to have PD A1 also on paper but this is a rarity.
Q. 14.1	**Format through which the PD A1 is issued**	PDF document
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Both
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	N/A
Q. 17	**Average processing time (in days)**	1
Q. 18	**Notification of changes and amended PD A1 process**	Yes, a new PD A1 is issued
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Bulk-submission (sort of)
		Pre-fill of forms with applicant's data
		Automatic data upload from national registers
		Real-time application status checking
		Integrated help functions
		Multilingual interface support
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a high extent. In general, ETK does not use AI or robotization, but the application is dynamic, i.e. if there is a concern based on the previous questions or register checks, the application service asks clarifying questions.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	The automation level is 68.7 % in the year 2025 so far. However, this includes also article 13 cases. We do not have data of fully automated article 12 cases but assume that the proportion is bigger than 68.7%
Q. 26	**Innovative features not covered elsewhere**	ETK feels that the eService i.e. the application portal is advanced but it is difficult to bring out any innovative features (one reason is that ETK does not know what kind of systems other MSs have at hand)

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	Once a PD A1 is submitted a LA_BUC_04 is triggered automatically. No human intervention is needed.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	N/A
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Number of all PD A1 applications received via online tool is 92.5 % in the year 2025 so far. 68.7 % of all PD A1 applications are deemed complete upon submission
Q. 17	**Observed impacts (efficiency, speed)**	If the application meets all the register checks and goes through the automated process, the PD A1 is issued in maximum of one hour. We currently lack specific data on the duration required to manually issue PD A1 certificates in Article 12 cases. However, approximately 50 % of all manually issued PD A1 certificates are processed within 1-2 days. It is reasonable to assume that the majority of manually processed article 12 cases fall within this timeframe, i.e more than 50 % of article 12 cases are processed in 1-2 days. Currently the PD A1 manual application queue is three weeks [the manual application queue has been between 3 and 8 weeks in 2025]

France

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	France
Q. 1 & Q. 6	**Official name of the institution managing the tool**	URSSAF
Q. 7	**Name of the online portal/tool for PD A1 applications**	ILASS (Instruction Législation Applicable Sécurité Sociale)
Q. 7	**URL or public access path**	https://www.urssaf.fr/accueil/services/travail-etranger-mobilite.html
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (self-employed people can use an e-ID system called "French Connect" which creates an account using an ID card);
		Business registration number / Tax ID
		Username/Password created on the portal
		Note: (Employers must have an account with Urssaf; if they don't (e.g. if their activity occurs in France for less than 25 %), they need to fill out a special form
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Employees
		Self-employed

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	No offline actions required
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Online receipt provided instantly and automatically by message and email. The receipt lists all the information submitted.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Message on the portal and secure email; no postal letter.
Q. 14.1	**Format through which the PD A1 is issued**	PDF document secured via a QR-Code
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	The applicant (employer/self employed) and any third party representative.
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	No specific deadline
Q. 17	**Average processing time (in days)**	Less than a day
Q. 18	**Notification of changes and amended PD A1 process**	For early return or cancellation: request can be made directly via the portal. For other changes: applicant must contact URSSAF
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Bulk requests (submitting multiple applications simultaneously)
		Pre-filling of forms with applicant's data
		Automatic data upload from national registers
		QR code to verify authenticity
		Real-time application status tracking
		Multilingual interface support
		Integrated help functions or chatbots
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a high extent (little to no human intervention required). The following activities are performed: • Automatic check of data employees via our various national data sources • Automatic check of company declarations • Verification of previous postings • Verification that the responses in the form correspond to the legal criteria (e.g., no subordinate relationship in the assignment)
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	The system is highly automated, with 88% of PD A1 certificates being automatically issued
Q. 26	**Innovative features not covered elsewhere**	QR code on each PD A1 certificate for verification, experimentations with AI
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	The tool sends notifications via the SED A009 format through an API to EESSI. The process is fully automated after the PD A1 is issued
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	QR code verification; anyone with the certificate can scan the QR code to verify the information
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	The tool handles over 1,000,000 applications annually, but no specific numbers for rejected applications were provided
Q. 17	**Observed impacts (efficiency, speed)**	The tool has significantly improved efficiency, with users reporting processing times of under 3 minutes

Croatia

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Croatia
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Croation Pension Insurance Institute
Q. 7	**Name of the online portal/tool for PD A1 applications**	HZMO-Lana, e-Citizens
Q. 7	**URL or public access path**	https://lana.mirovinsko.hr/
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	YES
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
		Art. 11
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed
		Employer for Art. 11
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed
		Natural persons can submit electronic requests via the e-Citizens system
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal, immediately that it has been received, information that the application has been made
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal
Q. 14.1	**Format through which the PD A1 is issued**	PDF document
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	The applicant (Employer / Self-employed person)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	No

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 17	**Average processing time (in days)**	2 days
Q. 18	**Notification of changes and amended PD A1 process**	Employer is obliged to notify us about any relevant change, especially those that affect the validity of the certificate issued. Thus, a new PDA1 is issued. In all these cases, a notification is automatically generated for the competent institution of the other member state, which is sent through the ESSI system.
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Bulk requests (submitting multiple applications simultaneously)
		Pre-filling of forms with applicant's dana
		QR code to verify authenticity
		Integrated help functions or chatbots
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a moderate extent (some human intervention required). The receipt of requests, opening of cases and assignments to work is automated. That would be to a moderate extent. However, the control and verification of all these conditions that must be met is controlled by manually inspecting internal registers and other available public bodies. Some of these things can and will be automated in the future, but very few cases will be able to be fully automated because the legal framework is set that way. Automation is possible in undisputed cases where everything is easily visible and verifiable, but in the majority of cases the criteria are set that way because data are not available or visible. They are attached to the request, such as an employment contract or a contract for a concluded busines. Otherwise registers that are not electronically available, such as the court registers, are checked. All of this does not require more than 5-10 minutes per request.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	About 90% of the data is automatically filled from other databases, officials still have to check the submitted documentation and make decisions
Q. 26	**Innovative features not covered elsewhere**	Data matching and control is done using the SAS digital device to connect all registers.
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	As soon as the officer completes the PD A1 confirmation from the application database that generates the A1 confirmations, the data is generated and filled in for the A009 set, which is then sent to the other country via the EESSI system.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	YES, verification is possible via QR code or by manually entering the ID of the documents and the address of the portal itself, checking the authenticity of the document.
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	The application is not rejected because of the way it was submitted. It can be submitted electronically, via applications, in person in paper form or by post. However, it is rejected if all the prescribed conditions according to the regulations are not met.
Q. 17	**Observed impacts (efficiency, speed)**	To process a completed PD A1 application for posting it is needed 2 days

Hungary

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Hungary
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Nemzeti Egészségbiztosítási Alapkezelő (National Institute of Health Insurance Fund Management)
Q. 7	**Name of the online portal/tool for PD A1 applications**	E-Papír (E-paper), Ügyfélkapu (Client Gate)
Q. 7	**URL or public access path**	https://epapir.gov.hu/; https://magyarorszag.hu/
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID
		Portal credentials
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	No
Q. 12.1	**If not, steps that require offline action**	Except for the submission of the application, the entire processing of the application is done manually: formal and substantive check, request for missing information if the application is incomplete, issuance of the A1 certificate
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Acknowledgement of receipt is sent automatically via email almost immediately after submission of the application. It contains the time and the institute that received the application.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	By post
Q. 14.1	**Format through which the PD A1 is issued**	Paper

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employers
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	8 days if application contains all information. 60 days if information is missing and the authority decides in a full procedure
Q. 17	**Average processing time (in days)**	cc. 8-10 working days
Q. 18	**Notification of changes and amended PD A1 process**	Can be submitted through Ügyfélkapu (Client Gate) electronically
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	No
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	Not automated at all
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	No automation
Q. 26	**Innovative features not covered elsewhere**	No innovative features
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	No interconnection
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No feature or webform enabling the verification of the authenticity and validity of the PD A1 issued is included
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Not available
Q. 17	**Observed impacts (efficiency, speed)**	No observed impacts

Ireland

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Ireland
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Department of Social Protection
Q. 7	**Name of the online portal/tool for PD A1 applications**	Welfare Partners
Q. 7	**URL or public access path**	www.welfarepartners.ie
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art 12
		Art 13

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	Business registration number/Tax ID
		Username/Password created on the portal
		Employers and Self Employed must register on the platform first, before applications are permitted
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Self-employed person
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	employer
		self-employed person
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automtically generated message by the portal
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal
Q. 14.1	**Format through which the PD A1 is issued**	PDF Download from the Employer Dashboard on Welfare Partners
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	The applicant (Employer / Self-employed person/third -party representative if applicable)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	4 weeks internal deadline
Q. 17	**Average processing time (in days)**	On-line applications, circa 4 weeks. Off-line applications, circa 8 weeks
Q. 18	**Notification of changes and amended PD A1 process**	Yes - via a call or dedicated email
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Real-time application status tracking
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a limited extent (significant human intervention is required, with some automated processes).
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	Automation assists 'back end' processing, but all decisions require human intervention
Q. 26	**Innovative features not covered elsewhere**	No

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	No interconnection
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No online/real-time verification tool. All PD A1s carry a unique certificate number, which may be verified (off-line) if enquired upon by a State entity
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	5201 applications are received on-line; 2419 - Art 12 applications issued; 221 are a mix of cancelled and disallowed
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Latvia

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Latvia
Q. 1 & Q. 6	**Official name of the institution managing the tool**	State Social Insurance Agency
Q. 7	**Name of the online portal/tool for PD A1 applications**	Latvija.gov.lv
Q. 7	**URL or public access path**	https://latvija.gov.lv/KDV/Eform/New/303fd71c-e070-4865-8c3b-3d5d83aa92a1
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes, latvija.lv
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art.12
		Art.13
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID
		E-bank
		smart_ID
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Employee (for Art. 12(1))
		Self-employed person (for Art. 12(2))
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Authentication not yet possible
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	No

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 12.1	**If not, steps that require offline action**	application by e-mail: electonic signature; by post or in person - signed application
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal; automated email notification
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal; Electronically via standard email.
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	The applicant (Employer / Self-employed person)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	1 month
Q. 17	**Average processing time (in days)**	5-15 days
Q. 18	**Notification of changes and amended PD A1 process**	via e-mail
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	N/A
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	No
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	N/A
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	No
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	No
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Lithuania

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Lithuania
Q. 1 & Q. 6	**Official name of the institution managing the tool**	State Social Insurance Fund Board under the Ministry of Social Security and Labour
Q. 7	**Name of the online portal/tool for PD A1 applications**	Elektroninė gyventojų aptarnavimo sistema/ Elektroninė draudėjų aptarnavimo sistema
Q. 7	**URL or public access path**	https://www.sodra.lt/lt/situacijos/informacija-draudejams/a1-pazymejimo-isdavimas?lang=lt
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID, (mobile) e-signature
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Email, portal account
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Email, portal account
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employers, self-employed
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	20 working days
Q. 17	**Average processing time (in days)**	15 working days
Q. 18	**Notification of changes and amended PD A1 process**	Email, portal account
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Bulk submission
		Pre-filling of forms with applicant's data
		Status tracking in portal
		PDF file of application is sent after submission

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a limited extent (significant human intervention is required, with some automated processes). No algorithms are used yet. Human intervention is needed. But state registers (revenue office database) can be used performing the checks. Algorithms are planned to be used in the future.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	0
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	Not present yet
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	No
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Luxembourg

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Luxembourg
Q. 1 & Q. 6	**Official name of the institution managing the tool**	CCSS
Q. 7	**Name of the online portal/tool for PD A1 applications**	SECUline (secure file-based submissions) + paper route; no public web portal yet (MyGuichet.lu in development).
Q. 7	**URL or public access path**	https://ccss.public.lu/fr/seculine.html
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No (MyGuichet.lu is, however)
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Article 12
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	Bank ID Systems
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		trustee, agent, authorised and legal representatives of employers
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		trustee, agent, authorised and legal representatives of employers
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	No.
Q. 12.1	**If not, steps that require offline action**	A traditional paper/post channel exists alongside the online (SECUline) one.
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	No acknowledgment of receipt.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Post.
Q. 14.1	**Format through which the PD A1 is issued**	Paper.

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	The applicant (employer).
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes.
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	No.
Q. 17	**Average processing time (in days)**	1-3 days
Q. 18	**Notification of changes and amended PD A1 process**	The employer must inform the CCSS of any such changes through the same channel as the original application (online or post). A modified A1 is issued.
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Batch submissions
		Multilingual forms
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	Automatised to a high extent. Automated pre-checks on SECUline verify affiliation, the employer–employee link, and durations/overlaps. Any anomaly is flagged for manual assessment before issuance.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	About 98% are issued without human intervention: ~43% straight-through via SECUline; the rest are automated unless scanned/paper data are flagged as unreadable or incomplete.
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	Once an A1 certificate is issued by the CCSS, an electronic notification is automatically sent through the EESSI system to the relevant counterpart in the host country.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Not available (will be provided in the coming weeks).
Q. 17	**Observed impacts (efficiency, speed)**	1-3 days to deliver a PD A1; applications going through SECUline require no human intervention, which is welcome as Luxembourg delivers a high volume of A1s every year. Regarding antifraud measures however, effectiveness was flagged during the interview as limited: the service must rely on employer-provided data, short postings are hard to verify ex-ante, and audits require manual resources.

The Netherlands

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	The Netherlands
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Sociale Verzekeringsbank (SVB)
Q. 7	**Name of the online portal/tool for PD A1 applications**	Twinternet and MijnSVB
Q. 7	**URL or public access path**	https://www.svb.nl/nl/id/a1-certificate-of-coverage-aanvragen
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Self-employed
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Self-employed
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal - An acknowledgment of receipt is displayed immediately for each request, in the form of a pop-up notification
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal - By post
Q. 14.1	**Format through which the PD A1 is issued**	PDF and paper
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employer, self-employed, employee, third-party representative
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	Yes, 8 weeks
Q. 17	**Average processing time (in days)**	If no contra-indications, 2 working days
Q. 18	**Notification of changes and amended PD A1 process**	Changes can be communicated in various ways, including through the digital tool. Depending on the nature of the change, this may result in either a new A1 declaration or an amendment to an existing A1 declaration. For example, a change in workplace within the same country does not require a new A1 declaration but leads to a modification of the existing one.

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Bulk requests (submitting multiple applications simultaneously)
		Pre-filling of forms with applicant's data
		Multilingual interface support
		Integrated help functions or chatbots
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	High extent (little to no human intervention required). The digital application process currently operates, in basic terms, entirely digitally for employers. All checks are conducted on the basis of the employer's statement and the information already available to the institution. This process is handled automatically. If any indications arise during processing, the application is flagged and subjected to manual review. Overall, the majority of applications are handled digitally in terms of issuance. However, it is not possible to provide a detailed breakdown of the specific categories that trigger manual intervention; this information is not readily available.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	± 50 %
Q. 26	**Innovative features not covered elsewhere**	No
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	The online tool is not directly connected to EESSI. The applications that citizens submit are not processed through EESSI. A separate system is used for processing. From this internal system, the LA_BUC_04 notification is triggered and data is subsequently exchanged through EESSI to the competent authority. Thus, the application portal itself is not integrated with EESSI.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	N/A
Q. 23	**Observed impacts (efficiency, speed)**	N/A

Portugal

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Portugal
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Instituto da Segurança Social, I.P.
Q. 7	**Name of the online portal/tool for PD A1 applications**	SSD/DLA
Q. 7	**URL or public access path**	https://www.seg-social.pt/ptss/pssd/menu/trabalho/entrada-saida-destacamento-trabalhadores
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 11
		Art. 12
		Art. 13
		Art. 16
		[Insert text]
		[Insert text]
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	Username/Password created on the portal
		NISS (Social Security Personal Number)
		[Insert text]
		[Insert text]
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Self-employed person (for Art. 12(2))
		Employer representative
		Self-employed representative
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Self-employed person (for Art. 12(2))
		Employer representative
		Self-employed representative
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal
Q. 14.1	**Format through which the PD A1 is issued**	PDF document
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	The applicant (Employer / Self-employed person), Third-party representative (if applicable)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	Yes, 30 days, according to the Administrative Procedure Code
Q. 17	**Average processing time (in days)**	Around 15 days (no data available)
Q. 18	**Notification of changes and amended PD A1 process**	Yes, it is done in the same application in which the request is made and a new PDA1 is issued

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Bulk requests (submitting multiple applications simultaneously)
		Real-time application status tracking
		Integrated help functions or chatbots
		Identity verification code (alphanumeric)
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a moderate extent (some human intervention required)
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	All PD A1 have human intervention
Q. 26	**Innovative features not covered elsewhere**	Don't exist.
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	Yes
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	The document carries an alphanumeric code that guarantees its authenticity.
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Number of PD A1s issued (granted) from applications submitted via the tool - 71281 (in 2024)
Q. 17	**Observed impacts (efficiency, speed)**	High administrative burden, both to companies and social security services, afecting efficiency and speed.

Poland

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Poland
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Zakład Ubezpieczeń Społecznych
Q. 7	**Name of the online portal/tool for PD A1 applications**	PUE ZUS (eZUS)
Q. 7	**URL or public access path**	https://www.zus.pl/ezus/logowanie?jezyk=en
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)
		Bank ID systems
		Username/Password created on the portal

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Employee (for Art. 12(1))
		Self-employed person (for Art. 12(2))
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer (for Art. 12(1))
		Employee (for Art. 12(1))
		Self-employed person (for Art. 12(2))
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Method: online; timeframe: possible to receive immediately after the application is filed; information: receipient of the application (i.e. Social Security Institution), applicant data, date of delivery and creation of receipt, potential supplementary data (e.g. how the receipt was created), information on how PD A1 will be delivered to the applicant; information on signature of the document
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal or by post
Q. 14.1	**Format through which the PD A1 is issued**	PDF document signed with qualified electronic signature
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	The applicant (Employer / Self-employed person) or Third-party representative (if applicable)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	30 days from the submission of request, 60 days in case of complex cases (if there is a need to conduct a proceeding). Timeframes are defined in the Polish Code of Administrative Proceeding.
Q. 17	**Average processing time (in days)**	No feedback on the average processing time. 60% of applications are processed within 7 days; 80% are processed within 30 days [data from interview)
Q. 18	**Notification of changes and amended PD A1 process**	Through the online tool with new PD A1 issued
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Tooltips, infotips and additional help indicators in the 'A1 certificate application wizard', and a 'checker' available in all e-services which is useful before sending the request (it indicates errors, missing fields or checkboxes required).
		Integrated help functions or chatbot
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a limited extent (significant human intervention is required, with some automated processes). Automation is basically limited to pre-filling of the data. No algorithms or AI used

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	0
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	No automation in this area. Separate EESSI notification has to be created - the system pre-fills some of the data.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	Yes, through an online tool called "Verification of A1 certificate authenticity"
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Received - 235292 in 2024; issued - 256110 in 2024; rejected - data not available
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Italy

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Italy
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Istituto Nazionale della Previdenza Sociale (INPS) – National Social Insurance Agency
Q. 7	**Name of the online portal/tool for PD A1 applications**	Rilascio certificazione A1 per attività lavorative in stati UE, SEE e Svizzera; Procedura Portale delle Agevolazioni
Q. 7	**URL or public access path**	https://www.inps.it/it/it/dettaglio-scheda.it.schede-servizio-strumento.schede-servizi.rilascio-certificazione-a1-per-attivit-lavorative-in-stati-ue-see-svizzera.html; https://www.inps.it/it/it/inps-comunica/diritti-e-obblighi-in-materia-di-sicurezza-sociale-nell-unione-e/procedure/procedura-portale-delle-agevolazioni.html
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes. The A1 application tool is integrated into INPS's broader digital service platform. INPS (Istituto Nazionale della Previdenza Sociale) is Italy's national social security institute, and its web portal (often accessed via MyINPS) hosts numerous online services. The PD A1 request service is one of these services on the INPS porta
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Covers PD A1 requests for postings under Article 12 of Regulation (EC) No 883/2004 for both employed and self-employed persons.
		Article 11

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	For Italian employers/intermediaries: SPID (Sistema Pubblico di Identità Digitale), CNS (Carta Nazionale dei Servizi), CIE (Carta d'Identità Elettronica). For foreign employers: prior INPS registration is mandatory. This requires: Italian tax code and INPS company registration number. Documentation from the competent authority in the home State confirming the employer's name and business activity (for social security classification and contribution rate determination). Appointment of a legal representative in Italy (mandate via public deed) responsible for fulfilling reporting and contribution obligations.
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers established in Italy.
		Foreign employers registered with INPS and their appointed representatives.
		Authorised intermediaries (e.g. accountants) formally delegated by the employer.
		Self-employed workers (for their own PD A1 applications).
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers established in Italy.
		Foreign employers registered with INPS and their appointed representatives.
		Authorised intermediaries (e.g. accountants) formally delegated by the employer.
		Self-employed workers (for their own PD A1 applications).
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Upon submission, the system generates an immediate protocol number acknowledging receipt. The final PD A1, if issued, carries a separate protocol number.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	When the request is approved, INPS issues the PD A1 certificate. The certificate is typically generated in PDF format (often digitally signed by INPS) and made available to the user. The applicant can download the A1 certificate from the portal or from their INPS account. Since the system is fully digital, the output (the A1 form) is provided electronically in accordance with the EU Single Digital Gateway requirements. The user (and possibly the employer, if it was the worker who applied) will be notified that the certificate is ready.
Q. 14.1	**Format through which the PD A1 is issued**	PDF
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	The person applying (employer or representative)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	Art. 2 of Law 241/1990 defines the ordinary term for the conclusion of an administrative procedure in 30 days. However, in the internet page dedicated to one of our online portals, the time for the conclusion of the procedure is estimated in 7 days (so this is not a legally binding term)
Q. 17	**Average processing time (in days)**	5
Q. 18	**Notification of changes and amended PD A1 process**	Changes during posting are communicated either via a new online application (if a new PD A1 is required). Or through the "cassetto bidirezionale" (secure two-way messaging) or PEC for changes not requiring a new certificate. For Italy, "amendments" to an existing PD A1 are not possible
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Some auto-complete functions are available, e.g. worker's name and residence populate automatically when the fiscal code is entered.
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	Not present.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	Not present.
Q. 26	**Innovative features not covered elsewhere**	Not relevant for Italy.
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	The national application system is interconnected with EESSI. Issuing a PD A1 under Article 12 automatically triggers an LA_BUC_04 notification to the relevant Member State.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	No available statistics.
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Sweden

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Sweden
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Försäkringskassan ('Swedish social insurance agency')
Q. 7	**Name of the online portal/tool for PD A1 applications**	Mina sidor
Q. 7	**URL or public access path**	https://www.forsakringskassan.se/english/move-travel-work-study-or-receive-health-care-abroad/move-study-or-work-abroad https://www.forsakringskassan.se/privatperson/flytta-jobba-studera-eller-fa-vard-utomlands/jobba-utomlands/jobba-inom-eu-ees-eller-i-schweiz-och-storbritannien
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e_ID (national electronic identification)
		Bank ID systems
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employee
		Self-employed person
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employee
		Self-employed person
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	No
Q. 12.1	**If not, steps that require offline action**	Paper-based submissions are required to verify employment. This can be done either by submitting a certificate of employment (by the employee/applicant) or by the employer sending this information to the Swedish Social Insurance Agency.
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	An application receipt is provided immediately in the online portal. The receipt contains the following information: 1. Acknowledgement that the Swedish Social Insurance Agency has received the application. 2. An outline of the next main steps in the application process; together with a reminder that the applicant must submit any attachments (if applicable). 3. Information that further developments in the application process (e.g., if the Social Insurance Agency needs more information regarding the application) will be received via e-mail. 5. Contacts details to the Swedish Social Insurance Agency in case the applicants have any questions.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	By digital mail or post.
Q. 14.1	**Format through which the PD A1 is issued**	PDF document or paper
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Both employer and employee
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	No

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 17	**Average processing time (in days)**	43 days (31 working days)
Q. 18	**Notification of changes and amended PD A1 process**	No special requirements, notifications can be done using telephone or e-mail, but not using the online tool.
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Multilingual interface support (Swedish and English)
		Integrated help functions or chatbots
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	Not automated at all
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	N/A
Q. 26	**Innovative features not covered elsewhere**	No
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	The PD A1 tool does not interconnect with EESSI. The Swedish Social Insurance Agency intends to develop this area, but there are no concrete plans as of yet.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	No
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	No statistics available
Q. 17	**Observed impacts (efficiency, speed)**	N/A

Liechtenstein

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Liechtenstein
Q. 1 & Q. 6	**Official name of the institution managing the tool**	AHV-IK-FAK
Q. 7	**Name of the online portal/tool for PD A1 applications**	Online-Schalter
Q. 7	**URL or public access path**	https://www.ahv.li/suche?tx_kesearch_pi1%5Bsword%5D=Entsendung
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	Social security / registration number

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed
		Employees
		Anyone; it is public
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	No
Q. 12.1	**If not, steps that require offline action**	Print, sign, upload and send
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	elecronically: the applicant gets an electronic receipt after introducing the request.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	A document in paper form is sent by post to the applicant.
Q. 14.1	**Format through which the PD A1 is issued**	Through the official EU form
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employers
Q. 15	**Retroactive applications allowed (Yes/No)**	Not relevant
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	Not relevant
Q. 17	**Average processing time (in days)**	Not relevant
Q. 18	**Notification of changes and amended PD A1 process**	Not relevant
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Not relevant
		Not relevant
		Not relevant
		Not relevant
		Not relevant
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	Everything is checked manually
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	N/A
Q. 26	**Innovative features not covered elsewhere**	No
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	No interconnection
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	Not relevant
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Not relevant
Q. 17	**Observed impacts (efficiency, speed)**	Not relevant

Slovenia

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Slovenia
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Republic of Slovenia
Q. 7	**Name of the online portal/tool for PD A1 applications**	SPOT (Slovenska poslovna točka), SPOT (Slovenian Business Point)
Q. 7	**URL or public access path**	https://spot.gov.si/sl
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13 (cases of single employer only)
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	SI-PASS (digital certificate)
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed persons
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed persons
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal When the user of SPOT finishes and electronically signs the application, the application is stored within SPOT. SPOT periodically (every 15 minutes) transfers the applications to the information system of Health Inurance Institute of Slovenia (HIIS) by using the web service, provided by HIIS. When SPOT successfully transfers the application, it generates and sends and e-mail to the SPOT user. The content of this e-mail is the information to the user that his application has been successfully received by HIIS.

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal
Q. 14.1	**Format through which the PD A1 is issued**	PDF document
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employers, self-employed persons. HIIS is developing support through zVEM (main health care portal in Slovenia), where employees will also be able to access the issued PD A1s. Additionally, zVEM is planned to be used for notifications about the issued certificate and any changes to the period made through SPOT.
Q. 15	**Retroactive applications allowed (Yes/No)**	No
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	Legal deadline 5 days, commonly issued on the same or next working day.
Q. 17	**Average processing time (in days)**	See abobve.
Q. 18	**Notification of changes and amended PD A1 process**	Online. Some changes (e.g. in place of work) require a new application.
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Bulk submission
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a moderate extent (some human intervention required). Automated process, with the exception of employment contract checks. Automated processing will soon apply to the checks of prior insurance and employment records.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	0% Every PD A1 still requires minimal manual handling (e.g. check of the employment contract and its conditions concerning work abroad).
Q. 26	**Innovative features not covered elsewhere**	Interconnection with the Financial Administration the Labour Inspectorate and the Business Register of Slovenia.
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	ZZZS periodically (once per day) runs IT solution whish is in a form of software batch job (java), running on the application server. This solution checks if any new A1 forms have been issued since last running this IT solution. For every new A1, the solution using RINA CPI interface generates new LA_BUC_04 case, generates SED and triggers sending this SED to the EESSI counterparty.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	QR scan and webform. The verification is carried out through a web application. Scanning the QR code automatically fills in the input data in the web application. The QR code provides quicker access to the same application.
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	76.289 out of 80.203 applications processed via SPOT in 2024. 5.730 initial rejections (36% due to tax unsettled tax obligations, 30% due to the employers/ self-employed person not normally pursuing activities in the Republic of Slovenia, 21% due to deficiencies in employment contracts).
Q. 17	**Observed impacts (efficiency, speed)**	Automated processing is a key factor in the swift issuance of PD A1s and should be applied to all steps of the proceedings.

The Slovak Republic

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	the Slovak Republic
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Sociálna poisťovňa (the Social Insurance Agency)
Q. 7	**Name of the online portal/tool for PD A1 applications**	Portál elektronických formulárov Sociálnej poisťovne (Social Insurance Agency electronic forms portal)
Q. 7	**URL or public access path**	https://eformulare.socpoist.sk/sk
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 11 - 13 and Art. 16 also
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)]
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Employee
		Self-employed person
		Anyone with power of attorney
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employer
		Employee
		Self-employed person
		Anyone with power of attorney
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal, proof of delivery and proof of submission is provided immediately. Acknowledgement of receipt contains a specification of the client's situation, i.e. whether it is a posting or concurrent performance of activities, etc. It also identifies the period of posting from when to when the client is requesting the document to be issued and also the countries concerned. In addition, the acknowledgement contains a generated electronic version of the stamp and information that it is an electronically generated document.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal
Q. 14.1	**Format through which the PD A1 is issued**	PDF document
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	The applicant (Employer / Employee / Self-employed person) Third-party representative (if applicable)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	Yes, internal deadline of 45 days for posting situations according to Art. 12; 60 days for simultaneous activities according to the Art. 13
Q. 17	**Average processing time (in days)**	20 days

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 18	**Notification of changes and amended PD A1 process**	Applicant shall notify the Social Insurance Agency in case of any changes, but there is no specified method for informing them. A form for reporting changes is available for download at the Social Insurance Agency's electronic forms portal. Once signed with a guaranteed electronic signature, this form will be processed by the Social Insurance Agency (submitted, for example, via the general form from the website www.slovensko.sk). The further process depends on the individual client. In principle, the Social Insurance Agency does not issue a new PD A1 document or update it for the correct period. The Social Insurance Agency informs the client by letter about how they have processed their notification, as the client's notification is not always accepted on the basis of what the client states. In cases where other institutions (e.g. health insurance companies) require an updated PD A1 document from clients the Social Insurance Agency updates them, e.g. with a shorter validity period, but clients have to specifically request that they have such a requirement and need an updated document for such reason.
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Automatic data upload from national registers (partially)
		Multilingual interface support
		Limited integrated help functions
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a high extent (little to no human intervention required). However, the automated process only applies to posting situations (both posting of employee and posting of self-employed persons) and international truck drivers working for one employer. The algorithm checks the answer fields filled in the predefined form and, if it meets all the conditions set by European legislation, it proceeds to the second part of the check. If any line of the form is filled in incorrectly, the automatic check ends and the application is sent for manual processing by an employee of the Social Insurance Agency. If it passes the first check, which means that all the answers to the questions indicate that a PD A1 document can be issued, it proceeds to an internal check of the registers and links to other public authorities already available to the Social Insurance Agency. The Social Insurance Agency verifies the data provided in the form with the data they have available directly in their systems. They have their own database of postings, as the Social Insurance Agency is the only authority that issues them. They check these postings in their database, then they check the income they have registered, the relationships between the employer and the employee, the period, and so on. Once all the checks have been carried out in relation to their registers and everything is in order, it means that what was stated in the form meets the conditions set by European legislation for the posting of employees.

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
		In the case of self-employed person (e.g. welder), the Social Insurance Agency checks these registers using an algorithm, and if all checks pass as set, the PD A1 is automatically issued based on the algorithm and sent to the applicant's mailbox. If any check fails, these applications are sent for manual processing to an employee of the Social Insurance Agency, i.e., the client is not automatically rejected, but their application is only redirected for manual assessment, as there may have been an error in filling out the data or an attachment may be missing, etc. An employee of the Social Insurance Agency checks the application and, if necessary, contacts the client to obtain additional information, after which the entire application will be assessed as a whole. If the employee determines that the client does not meet the conditions, they will reject the application, but if they subsequently find that it is possible to issue the document, for example for a shorter period, they will verify these facts and then issue the document.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	92% issued by human; 8 % issued by application The main problem is that only about 20 percent of applications are electronic, which means that 80 percent of applications are assessed manually, without automation or algorithms. The Social Insurance Agency is working to implement artificial intelligence in these processes, as many processes fall under manual assessment by the institution's employees. Applications are often submitted on behalf of third parties, most commonly their accounting firms, in which case a power of attorney must be attached. The Social Insurance Agency is currently not in a position where a machine would be able to thoroughly assess the content of the power of attorney and evaluate whether it authorizes the third party to submit an application for the issuance of a PD A1 document, and therefore such applications are referred to the institution's employees for manual assessment.
Q. 26	**Innovative features not covered elsewhere**	No
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	PD A1 tool does not interconnect with EESSI.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	Sociálna poisťovňa (the Social Insurance Agency) does not include feature or webform enabling the verification of the authenticity and validity of the PD A1 issued.
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	In 2024, Sociálna poisťovňa (the Social Insurance Agency) has received 13238 applications via the tool, from which they have granted 3487 PD A1s.
Q. 17	**Observed impacts (efficiency, speed)**	The average time needed to issue an PD A1 is 20 days (from the date of submission to the day of decision)

Iceland

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Iceland (IS)
Q. 1 & Q. 6	**Official name of the institution managing the tool**	Tryggingastofun/Social Insurnce Administration
Q. 7	**Name of the online portal/tool for PD A1 applications**	https://island.is/s/tryggingastofnun
Q. 7	**URL or public access path**	Tryggingastofnun
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	You can apply for all types of applications through the website.
		An automation regarding applications under Article 12 is in preparation.
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	In the application, you are asked about these items: your national identification number, whether you have paid taxes here in the country. By applying, you allow the Social Insurance Administration to obtain proof that this is the case.
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed
		Employees
		Representatives for employees/self-employed
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Self-employed
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	No
Q. 12.1	**If not, steps that require offline action**	An automation regarding applications under Article 12 is in preparation.
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	As automation has not yet taken place, no confirmation is given, but it will be once this has become electronic.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Delivery method of decision is given by email.
Q. 14.1	**Format through which the PD A1 is issued**	PDF document from the systems of the Social Insurance Administration/Tryggingastofnun

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employer and employee.
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes, but not further than four years.
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	According to icelandic law There is a general limitation period of 4 years, and after that time, a claim is considered to be extinguished regarding insurance premiums.
Q. 17	**Average processing time (in days)**	From 2-4 working days.
Q. 18	**Notification of changes and amended PD A1 process**	From 1-3 days
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Not used
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	Not automated at all.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	N/A
Q. 26	**Innovative features not covered elsewhere**	No
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	Not present
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	PDA1s in PDF format carry a digital signature.
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	N/A
Q. 17	**Observed impacts (efficiency, speed)**	Yes, the Social Insurance Administration works on such things.

Norway (NAV)

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Norway
Q. 1 & Q. 6	**Official name of the institution managing the tool**	NAV
Q. 7	**Name of the online portal/tool for PD A1 applications**	nav.no
Q. 7	**URL or public access path**	Søknad om avklaring av trygdetilhørighet under opphold i EØS eller Sveits
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	Yes

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12
		Art. 13
		Art. 16
		Situations under art. 11
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)
		Bank ID systems
		Username/Password created on the portal
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Employees
		Self-employed
		Persons with Power of attorney
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Employees
		Self-employed
		Persons with Power of attorney
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal. Issued immediately. The receipt contains information that the application has been received and the expected time of processing. It does not contain information that the application is complete.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal, and by post
Q. 14.1	**Format through which the PD A1 is issued**	PDF or paper
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employer and employee. Person with power of attorney / third party representative (if applicable)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	No
Q. 17	**Average processing time (in days)**	130
Q. 18	**Notification of changes and amended PD A1 process**	Yes, and a new PD A1 is issued

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a limited extent (significant human intervention is required, with some automated processes). There are some automated processes: cheking for previous periods of posting and nationality.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	0 % (100 % with human intervention)
Q. 26	**Innovative features not covered elsewhere**	N/A
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	The portal as such is for submitting claims for further processing. It is, however, part of an "integrated eco-system" for applicable legislation cases, so when the PD A1 is issued, the LA_BUC_04 is automatically produced and sent to the receiving country in the EESSI system.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	Webform
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Not available
Q. 17	**Observed impacts (efficiency, speed)**	Not available

Norway (Altinn)

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Self-explanatory	**Country**	Norway
Q. 1 & Q. 6	**Official name of the institution managing the tool**	NAV
Q. 7	**Name of the online portal/tool for PD A1 applications**	altinn.no
Q. 7	**URL or public access path**	Altinn - Søknad om A1 for utsendte arbeidstakere innen EØS/Sveits
Q. 7	**Is the tool part of a wider national platform? (Yes/No)**	No
Q. 7.1	**Scope of the tool (only Art. 12 / also Art. 13, 16, insert all those that apply)**	Art. 12.1 only

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 10	**Authentication method(s) (e-ID, Tax ID, portal credentials, etc., insert all those that apply)**	e-ID (national electronic identification)
		Bank ID systems
		Username/Password created on the portal
Q. 8	**Who can access the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Employees
		Persons with Power of attorney
Q. 9	**Who can submit a PD A1 application via the tool (employers, self-employed, employees, others, list all those that apply)?**	Employers
		Employees
		Persons with Power of attorney
Q. 12	**Is the application process fully online, including evidence & signatures? (Yes/No)**	Yes
Q. 12.1	**If not, steps that require offline action**	N/A
Q. 13.1-3	**Acknowledgement of receipt: method, timeframe, and information**	Automatically generated message by the portal. Issued immediately. The receipt contains information that the application has been received and the expected time of processing. It does not contain information that the application is complete.
Q. 14	**Delivery method of decision (portal, secure email, post, etc.)**	Electronically via the application portal, and by post
Q. 14.1	**Format through which the PD A1 is issued**	PDF or paper
Q. 14.2	**Recipient(s) of the PD A1 (employer, employee, both)**	Employer and employee. Person with power of attorney / third party representative (if applicable)
Q. 15	**Retroactive applications allowed (Yes/No)**	Yes
Q. 16	**Legal or internal deadline to issue PD A1? If yes, specify**	No
Q. 17	**Average processing time (in days)**	130
Q. 18	**Notification of changes and amended PD A1 process**	Yes, and a new PD A1 is issued
Q. 19	**User-friendliness features (bulk submission, pre-fill, status tracking, etc., list all those that apply)**	Pre-filling of forms with applicant's data
		Automatic data upload from national registers
Q. 24 and Q. 24.1	**Automation/robotisation: level and scope (if present)**	To a limited extent (significant human intervention is required, with some automated processes). There are some automated processes: cheking for previous periods of posting and nationality.
Q. 25 and Q. 25.1	**Proportion of fully automated issued PD A1s**	0 % (100 % with human intervention)
Q. 26	**Innovative features not covered elsewhere**	N/A

PD A1 PORTALS INVENTORY		
Question No.	**Question Field**	**Answer Field**
Q. 20 and Q. 20.1	**Description of EESSI interconnection and automated LA_BUC_04 triggering (if present)**	The portal as such is for submitting claims for further processing. It is, however, part of an "integrated eco-system" for applicable legislation cases, so when the PD A1 is issued, the LA_BUC_04 is automatically produed and sent to the receiving country in the EESSI system.
Q. 27 and Q. 27.1	**Verification of authenticity (e.g. webform, QR scan)**	Webform
Q. 21.1	**Usage statistics (applications received, issued, rejected)**	Not available
Q. 17	**Observed impacts (efficiency, speed)**	Not available

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