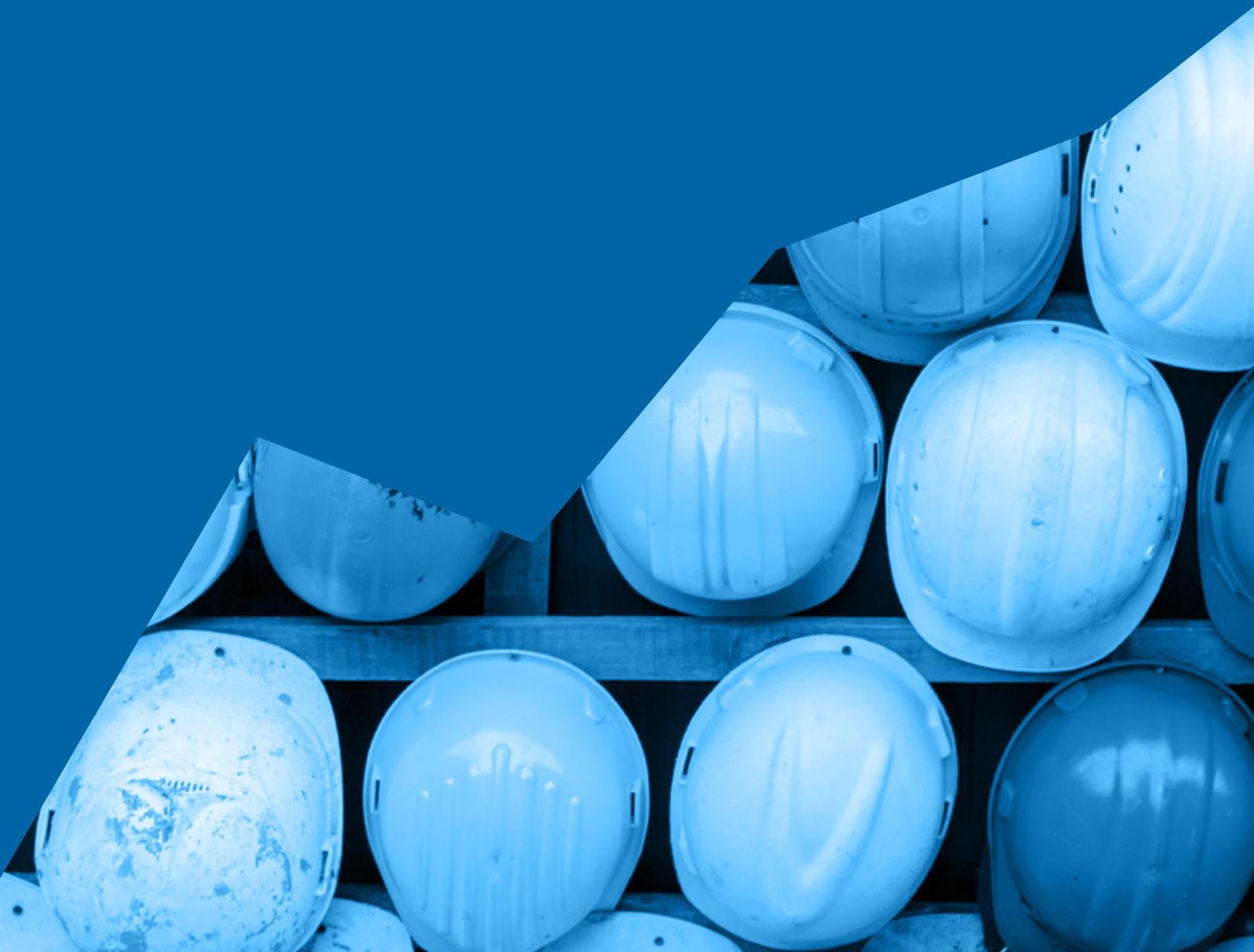


# EU Post Lab

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Developing experiences  
of administrative cooperation  
and enhanced access to information  
in the framework of the posting  
of workers

RECOMMENDATIONS



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Developing experiences  
of administrative cooperation  
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## RECOMMENDATIONS



This report was produced for the EU Post Lab project, which received funding under the call for proposals VP/2016/006 of the DG Employment, Social Affairs and Inclusion of the European Commission. The opinions expressed in this report reflect only the authors' view. The European Commission is not responsible for any use that can be made of the information contained therein.

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# INTRODUCTION

The EU Post Lab project, co-funded by the DG Employment, Social Affairs and Inclusion of the European Commission, is aimed at supporting administrative cooperation and cross-border information sharing at transnational level in the field of posting of workers in the construction sector.

The project stems from the findings of the Post-Lab project, which assessed a set of practices capable of easing compliance with rules concerning the posting of workers, and of detecting fraud. The results of Post-Lab are detailed in the related Guidelines and Final Report, which suggest pathways for improving cooperation and data sharing in the field of posting of workers in the construction sector<sup>1</sup>.

EU Post Lab focuses on the role administrative data play in the identification of fraud in relation to the posting of workers and entails the creation of a prototype database for strategic data sharing at transnational level.

To this aim, the project brings together a network of stakeholders from 10 EU Member States.

Running between October 2016 and September 2018, its core activities can be summarised as follows:

- during the initial phases, the project partners implement desk and field research activities to analyse existing national databases relevant to Directive 96/71/EC (Posting of Workers Directive) and to Directive 2014/67/EU (Enforcement Directive) in all the addressed countries, their contents and features, the authorities managing them (monitoring and enforcement bodies or other authorities), and how they fare in reflecting the real conditions of employment, as well as in identifying abuses and circumvention of the Directive 96/71/EC;
- afterwards, the partners define and implement a prototype database to allow for digital information sharing between relevant authorities and stakeholders, with a focus on sectoral funds of the construction sector. In many EU countries these funds intermediate wage elements to be adjusted according to provisions applicable in the host country, like the holiday pay. The database shall be built in such a way as to share key information in the posting of workers area, such as the establishment of the sending undertaking in the sending country, the existence of the employment relationship with the posted worker in the sending country and the regular payment of the wage elements intermediated by the relevant funds. It shall be linked with web modules in order to allow employers to easily declare the posting of workers to the relevant funds, as well as with sources of information on terms and conditions of employment in the covered countries. The creation of this tool benefits from information produced by desk and field research, covering features of existing information-sharing experiences and providing an overview of the authorities arguably interested in sharing information;
- as a final step, the project partners elaborate and disseminate – in all the languages of the project – a Final Report, illustrating key findings, expected benefits from the project and suggesting pathways to improve transnational administrative cooperation, and a set of recommendations, explaining how to make the most of the database, and what further cooperation, monitoring, and enforcement measures could support the goal of avoiding misuse or circumvention of the Posting of Workers Directive while easing the posting of workers.

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1. See: <http://www.fondazionebrodolini.it/en/projects/post-lab>.



# 1. RECOMMENDATIONS FOR IMPROVING ADMINISTRATIVE COOPERATION AND ACCESS TO INFORMATION IN THE FRAMEWORK OF THE POSTING OF WORKERS

As part of the analysis on working conditions of posted workers, forms of undeclared work and irregularities affecting posted workers and, especially, on the features of relevant databases, the partnership elaborated a set of recommendations meant for the construction sector but largely applicable to other activities as well.

The foundations of the analysis have been the comparison of existing use of administrative data, the related strengths and weaknesses and the challenges faced in the area of enforcement of provisions concerning the applicable terms and conditions of employment and social security provisions.

The recommendations target the activity of inspection bodies, disentangling how and to what extent administrative data can ease their tasks and how policy makers and social partners can help achieving better compliance with rules on posting.

In order to ease the reading, they are divided in three core strands, each covering possible actions from different perspectives.

The report is completed by a practical example of how digitalisation of data sharing can ease compliance with rules on posting of workers by working both on improvements and simplification of monitoring activities and on reduction of administrative burden for employers.

## **Ease access to information and information flow**

- Increase awareness on rights and duties concerning posting

Project related research, especially the qualitative interviews to experts and the web-survey, showed that still much shall be done to raise posted workers' awareness on their rights. Only 41,2% of posted workers taking part to the web survey knew which was the standard working time in the host country, whereas 39,8% declared to be unaware and 19% gave a wrong answer. Similarly, 18.5% of workers did not know if they were paid or not in line with the minimum pay entailed in the host country.

The enforcement of applicable terms and conditions of employment does remain hard to deal with if posted workers, or even employers, are unaware of the wage structure of the construction sector in the host country and its compulsory elements or of the other core matters to be aligned with the provisions in force in the host country and pursuant to the Posting of Workers Directive.

Some initiatives to increase awareness are already ongoing and worth mentioning. The Reder project, assessed in the Post-Lab Guidelines, reached out posted workers in construction sites and on web by means of leaflets shortly explaining their rights in the host country and providing further links and contacts.

Similarly, the European Federation of Building and Woodworkers has promoted a web-site (<https://www.constructionworkers.eu/>) hosting detailed, up to date and easy to access information on posted workers' rights in the construction sector across Europe.

Pursuant to the Enforcement Directive, the EU is also pushing for better information, committing Member States to make available information on terms of employment applicable to posted workers on a single official national web-site, and in a user-friendly manner.

- Simplify information flow from employers to public authorities

There are three main information duties that employers wishing to post workers abroad need to accomplish.

Pursuant to the Enforcement Directive, a preliminary declaration – containing key information on the sending organisation (including contact details), number and names of posted workers, duration and place of work - is due to the authorities of the host State.

In order to declare and prove the attachment of posted workers to the social security institution of the sending country, a portable document (A1 form) shall also be produced, possibly before the posting begins, albeit this is not compulsory.

Finally, if sectoral funds intermediate some elements of the workers' pay (like the bad weather or the holiday pay) considered as part of the minimum rates of pay, sending undertakings will be generally required to register their posted workers in the host country and pay contributions for the intermediated wage elements there. In turn, they can liaise with the similar institution possibly in place in the sending country to prevent double payment of contributions and freeze their duties.

The automation of these processes can help simplifying information flow and avoiding falsifications, a risk highlighted for paper versions of the A1 forms.

As part of project activities, CNCE has developed a prototype database potentially useful to simplify information flow from employers to sectoral funds in case of posting, allowing to have better and more easily accessible records concerning each company and posted worker.

Such an experience can easily be adapted, upscaled or transferred to similar contexts, as long as there is the political will to do so.

A detailed presentation on aims, features and technical structure of the database follows in the next section.

### **Upgrade and link national administrative databases**

- Ensure interoperability between national level databases covering related domains or access to key information

Information on key data concerning the regularity of posting often lies in different databases at national level, either because they are managed by more than one authority or because they are run by local branches.

The structure of these databases does not always allow for interoperability or communication between them, slowing down or hampering processes of data matching, which is indeed crucial for monitoring compliance with rules on posting.

The case may be information on whether: (i) the wage has been aligned according to provisions in force in the host country; (ii) social security contributions have been regularly paid in the sending country; (iii) the company carries out substantial activities in the sending country (i.e. it is not a letterbox company), can be told from three different sources, that is to say: (1) database on employment contracts; (2) social security contribution records; (3) business register.

This leads towards slower or leaky processes of enforcement of rules, as well as with possible redundancies in the requests of information made to a company.

Instead the possibility to bridge manifold databases useful for ensuring the regularity of posting, and especially to accomplish tasks of labour inspection, could rely on at least three different options, i.e.: (i) allowing for a full matching of data sources; (ii) allowing for selective matching of data sources, i.e. making only key variables accessible to authorised users other than those of the responsible authority; (iii) allowing for the sharing of summary information (e.g. extracting information on the regularity of wages or of social security contributions payment out of a database covering full records).

The advisability of one or more of the abovementioned options cannot overlook policy and technical considerations to be made by the relevant authorities concerning privacy protection and considerations of the possible trade-off between completeness and clarity of information. For instance, gathering all data concerning social security payments may allow to distinguish negligible mistakes or delays in contribution payments from systematic evasion. Yet, this may require further and more complex elaborations than sharing a binary information on whether the company is in line with due payments or not.

- Increase data availability and transparency while guaranteeing privacy

Data availability and transparency may create forms of accountability of companies while creating room for 'multilateral' controls by a wider range of actors other than public inspectors, including stakeholders such as unions, sectoral funds and employers' organisations, but also academicians and data journalists.

In this regards, databases covering information relevant in the area of employment shall be made public while guaranteeing privacy.

For instance, information on employment contracts and wage levels applied by a company could help detecting irregularities. Yet, the identity of workers shall be protected.

A more conservative option may be as well to hide the identity of companies, while allowing to extract highly disaggregated data, e.g. by sector, business size and Nomenclature of Territorial Units for Statistics (NUTS 2 or 3 level).

- Produce worker-oriented statistics on posting

Statistics allowing to study posting of workers at transnational level are mostly 'business-oriented', disaggregating data for Member States and sectors of activity. The EU Post Lab project, focusing on a selected sample of Member States and on the construction sector, experimented a survey matching information on working conditions with demographic data, such as age, gender and educational level.

The availability of such data, which are indeed covered by the A1 form, could provide for a more complete overview of the dimensions of posting of workers, helping the identification of features of posted workers themselves, which could in turn influence the strategies of communication of social partners and improve the understanding of the phenomenon by authorities.

In addition, complementing data on posting with statistics on living conditions of posted workers, e.g. on their lodging, could help ensuring posted workers are granted adequate living standards.

- Make administrative datasets work to support and ease (not to replace) field inspections

The use of queries, filters, or even of Artificial Intelligence, as in Belgium, shall help identifying companies/ areas where fraud is likely to hide. Software can easily be instructed to flag outlier cases or can learn which companies might not comply with employment and social security provisions from past records.

As mere examples, the project identified some possible 'easy-wins', which could be used as filters to identify suspected cases.

For instance, markers of possible letterbox companies could be:

- Hiring dates close to submission of A1 requests;
- Date of establishment of the company close to submission of A1 requests;
- The establishment of many legal entities at the same address;
- A high number of companies established by the same person, especially whenever a new company replaces a closing one.

As concerns irregularities in the payment of wages, filters could single out companies performing:

- High share of part-time workers on the headcount;
- High amount of non-taxable allowances per worker;
- High ratio turnover/headcount (or - if possible - the value of specific types of construction works/the headcount, as for the experience of some Italian regions).

On the other hand, administrative datasets may be blind to certain fraud, due to the unavailability of data or to a misrepresentation of reality. For instance, a company asking workers to pay back a share of their wage in cash may end up untracked by administrative datasets reporting data from payslips. It might also happen that a high share of part-time workers results from HR policies or collective agreements reducing working time in order to avoid redundancies or to promote work-life balance rather than from the attempt to circumvent provisions on minimum pay.

For these reasons, inspections are recommended to rely on 'suggestions' from the administrative datasets, while maintaining a share of random controls.

Regular meetings with social partners and relevant NGOs at local level can also help gathering a more comprehensive view on cases to be tracked and on the rise of new types of fraud.

- Make field inspections work to increase the ability of administrative datasets to predict possible fraud

Taking into account the previous recommendation, whenever field inspections find cases of non-compliance, this information should be possibly inputted into relevant databases in a way to narrow the distance between the overview available from administrative data and the real terms and conditions of employment. The Portuguese SINAI database, for instance, is meant to grant inspectors a structured source of information on inspections useful to filter companies at risk of fraud.

### **Support transnational administrative cooperation**

- Create mutual trust between inspectors and knowledge of different national labour laws and employment practices (through joint trainings, inspections, workshops...)

Apart from law provisions binding authorities to mutual cooperation in the framework of European Treaties,

and in the specific domain of posting of workers, some key tools are already in place to support cooperation of inspectors at transnational level. Those are the Internal Market Information System (IMI), allowing inspectors to overcome language barriers by using a set of pre-translated questions and answers to share information in areas of European relevance, and the Electronic Exchange of Social Security Information platform, providing for a digital system allowing for secure, structured and rapid exchange of data between social security institutions.

Nevertheless, much can still be done to improve the quality and the efficacy of information sharing between different national authorities. Experiences of joint trainings, inspections or workshops can help create a climate of trust between colleagues from different countries, while equipping them with the relevant knowledge to tailor their requests and answers in the framework of transnational cooperation.

In this regard, the Post-Lab project already illustrated a number of relevant experiences, such as the REDER network, and the Agreement for the exchange of information and cooperation between the Spanish and the Portuguese Labour Inspectorates, whereby unions and/or inspectorates from different countries cooperate on a structural basis to better understand and tackle cases of cross-border fraud.

- Smooth tools for transnational data sharing between competent authorities

The quickness of communication at transnational level is crucial for the success of administrative cooperation, especially in the area of fight against letterbox companies, which are able to shut down and set up in another Member State overnight. The deployment of the EESSI system represents a great step towards the goal of having not only precise but also quick information. The EU Post Lab project paved the way to the establishment of a joint digital infrastructure also for sectoral funds, which do have a stake on the issue and owns a relevant stock of information in the payment of wages across several EU countries.

Such a process can be an example to create a wider network of cooperation and data sharing between the covered funds and other funds or organisations able to certify the regularity of related payments.

In a view to support discussion on the adoption of similar tools, a prototype database has been created, whose features and goals are outlined in the following section.



## 2. THE EU POST LAB PROTOTYPE DATABASE: A CONCRETE TOOL TO EASE ADMINISTRATIVE COOPERATION

The core phase of the project focused on the development of a prototype database covering information sharing between sectoral funds active in Italy, Germany, France and Austria.

The practice covers three similar bilateral agreements in place between CNCE, i.e. the coordinating body of the Italian sectoral funds of the construction sector (Casse Edili) and similar national institutions active in other countries, namely in Germany (Soka Bau), Austria (BUAK) and France (UCF).

All these bodies are responsible in their home countries for wage elements considered as part of the pay rates posted workers shall be entitled to as per provisions in force in the host country, like bad weather pay, holiday pay and the thirteen month pay. The amount these contributions can reach is roughly 30% of the payroll, making a difference both in the labour cost for employers and in the pay workers are entitled to, increased by the funds.

From an administrative point of view, in line with the requisite to adapt wages to the provisions of the host country set by the Directive 96/71/EC, undertakings sending their workers abroad shall register at the relevant fund in the host country, suspend the payment in the sending country for the posted workers, and contribute to the sectoral fund of the host country for the period of posting.

At the same time, workers shall contact back the fund in the host country in order to get back the intermediated wage elements they are entitled to, such as a share of the holiday or thirteen month pay.

Having ascertained the similarity between minimum rates of pay and the level of contributions rates applied by sectoral funds across the borders, the agreements allow companies posting workers not to contribute to the relevant sectoral fund of the hosting country, remaining instead bound to pay for these contributions in the sending country in a way similar to what occurs in the field of social security.

The process, which currently takes place by e-mail exchange and manual input of related data, can be significantly speeded up and streamlined by means of a digital infrastructure linking the different actors and stages of the procedure.

The creation of the prototype database departed exactly from these considerations, representing a concrete example on how procedures of cross-border data sharing can be digitalised and streamlined. The following paragraphs explain in detail the process of elaboration of the database features and structure, working as a presentation of the prototype, and as a knowledge basis for possible similar initiatives.

## 2.1 INTRODUCTION

The bilateral agreements working as a legal basis for the possibility to introduce the prototype database have been entered by CNCE, SOKA BAU, UCF and BUAK in 2008, in accordance with the national level trade unions and employer's organisations from the respective countries (Italy, Germany, France and Austria) and backed by the related European social partners, to pursue the following objectives:

- to prevent posting of workers from creating social dumping;
- to protect construction workers by ensuring a wage homogeneity and establishing a correct set of rules for all the workers in the same construction site;
- to allow the company to freely participate and to work across the European Union without constraints or local privileges;
- to share information between the unions and the employers' organisations of the involved countries concerning the local contractual conditions;
- to fight against irregular work and to supervise the correct application of insurance, contractual and social security obligations.

The agreements have been the result of preparatory works, allowing to ascertain the similarity of the wage structure, the share of contributions due to sectoral funds on wage and the similarity of the related costs in each covered country.

Other conventions between the individual parts were subsequently added, thus creating a network of four countries linked by bilateral information exchanges.

## 2.2 OBJECTIVES AND CONSTRAINTS

After the signing of the bilateral agreements and the beginning of manual exoneration procedures, it was decided to use technology to improve and automate, as far as possible, the data flows between the various organizations signing the agreements, while granting the possibility of new accesses in the view of any future enlargement to other countries. It was therefore decided to set up an IT infrastructure called EUPOSTLAB having the following main objectives:

- a) Improving the quality of information;
- b) Making the acquired information immediately available;
- c) Tracing the operations performed;
- d) Having a common database for statistical analysis.

During the process of setup and testing of the database, the partnership further operationalised these objectives as follows:

- a) Create a common system that can be used for all the operations necessary for exoneration, by all the organisations signing the agreements and from the companies interested in the request of exoneration;
- b) Minimize redundancies in data entry;
- c) Reduce manual operations as far as possible;
- d) Maintain the authority and autonomy of individual organisations;
- e) Make the operations carried out by the organizations in the web interface immediately visible (authorizations or subsequent modifications);
- f) Allow the data acquired from the new system to be exported using standard formats to automatically integrate them into the systems of individual organizations;
- g) Prepare the system to accept and integrate new agreements or sets of information from other organizations.

## 2.3 DEFINITIONS - ACRONYMS AND ABBREVIATIONS

As a first and preliminary step, the partnership adopted a shared terminology necessary to create a shared understanding of the different features of the databases and roles of users.

The key definitions are:

- a) Bilateral agreements - the international agreements signed for the management of the posting of workers between the signatory parties;
- b) Building company – the one who asks to post workers abroad;
- c) Exoneration request - the request made by the company to post its workers abroad while continuing to pay contributions in the sending country;
- d) Organization - one of the bodies that signed the bilateral agreements (as of now: CNCE, SOKA-BAU, BUAK and UCF)
- e) Sending organization - the organization in charge of authorizing, modifying or revoking the exoneration request of the company or the organization managing the contributions of workers
- f) Receiving organization - the organization that receives and accepts the request for exoneration, territorially competent for the construction site where the workers are posted.

## 2.4 THE PROCESS AS-IS

The following step was to describe through the 'AS-IS process' the manual procedure in use between the signatory organisations to ensure compliance with the agreements.

In every process, the following subjects are always actively involved:

- 1) the company intended to perform work in a foreign state (henceforth referred to as "the company");
- 2) the sending organization (one of the signatories of the agreements, certifying or owning information on the registered office of the company);
- 3) the receiving organization (one of the signatories of the agreements different from the sending organization and qualified at local level on having the information on the place of execution of the works in the foreign state).

Before the starting date of the work the company must produce a certificate of exoneration to be submitted to the sending organization.

This certificate must contain:

- registration number or code of identification of the company;
- place where the work is carried out (or place where the worker is to be posted);
- typology of work;
- client's name;
- starting date of the posting;
- end date of the posting.

The picture below illustrates the module for the identification of the company in the exoneration request adopted by CNCF.



### Dichiarazione per la richiesta di esonero dall'iscrizione alla SOKA-BAU

Pratica n.: \_\_\_\_\_

Cassa Edile \_\_\_\_\_ Codice CNCE \_\_\_\_\_

Ragione sociale Impresa: \_\_\_\_\_ Cod.Fisc. \_\_\_\_\_

Codice impresa presso la Cassa Edile: \_\_\_\_\_

Nome Titolare: \_\_\_\_\_

Via: \_\_\_\_\_ n°: \_\_\_\_\_

CAP: \_\_\_\_\_ Comune: \_\_\_\_\_ Provincia \_\_\_\_\_

Telefono: \_\_\_\_\_ Fax: \_\_\_\_\_

E-mail: \_\_\_\_\_



The process has left organizational freedom in the procedures between the signatory organizations and the related territorial structures.

During the period of posting, or after the first authorization, four different circumstances can take place, namely:

1. The situation remains unchanged;
2. The posted workers change;
3. The sending organization detects a situation of irregularity of the company;
4. The receiving organization needs clarification.

Operatively, except for the first possibility, e-mail exchanges will take place indicating the variations or regularity requests for particular periods.

## 2.5 SOLUTION DETAILS

The automation of the manual process identified a set of technical solutions, namely:

1. Create a system consisting of two modules EUPOST-LAB WEB and EUPOST-LAB DATABASE where:
  - a. EUPOST-LAB WEB is the web interface accessible by all the organizations signing agreements (to date CNCE, SOKA-BAU, UCF, BUAK) and usable for all the operations necessary in the exoneration requests;
  - b. EUPOST-LAB DATABASE is the common data source (accessible only through EUPOST-LAB WEB) where all the information present in the new exoneration requests will be archived;
2. Create an accounting and profiling system for access to the system by organizations that have signed agreements and businesses: system administration, organizations that are signatories to the agreements, companies;
3. Set up the system to accept new bilateral agreements and/or enter data useful for statistical analysis;
4. Create a framework for analysing and displaying aggregate data for diagnostics and statistical use.

In detail, EUPOST-LAB WEB is the central module that, through the reading and/or writing of data within the database module, manages all the operations necessary to manage the exoneration requests. More precisely it allows:

- Management of the creation of all the users (as per logic indicated in the following paragraphs) authorized to access the system;
- the importation and/or creation of the companies' usernames accredited by the sending organizations;
- automated management of all the exoneration request processes (request insertion, evaluation, certification);

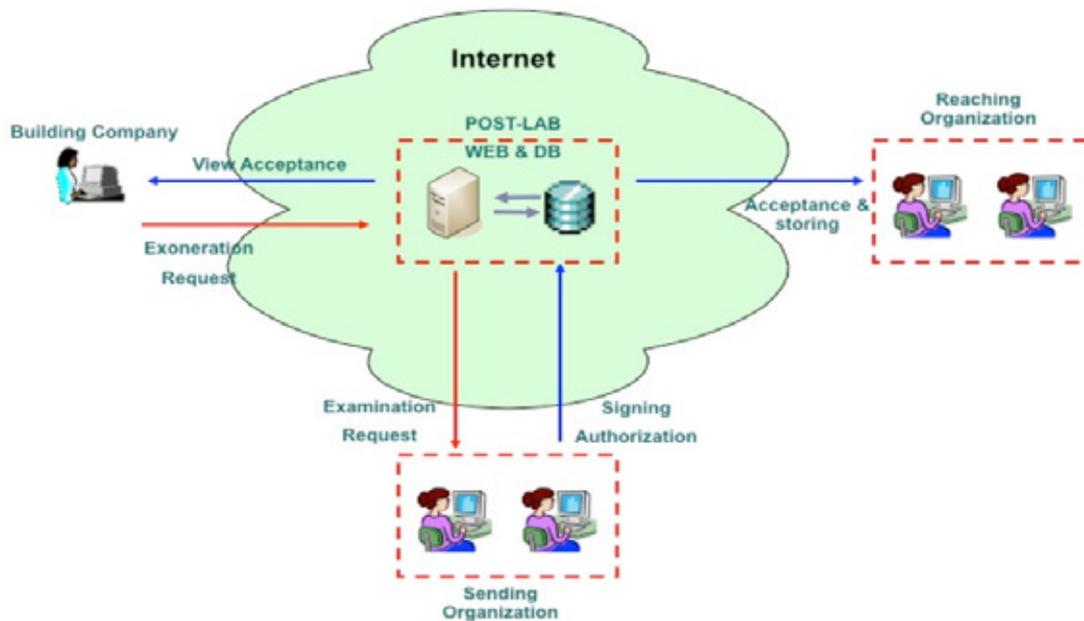
- the automatic routing of exoneration requests to the sending organization;
- management of service communications between sending and receiving organizations (and vice versa);
- statistical analysis of aggregate data present in the system;
- the importation of any new bilateral agreements;
- monitoring of all operations performed in the system.

## 2.6 OPERATIONS FLOW

The flow of information between organizations has then been schematised according to the following operational flow:

- The sending organization registers the company (Building company) on the EUPOSTLAB WEB system;
- The company uploads its exoneration request via EUPOST-LAB WEB;
- The request of the company becomes immediately visible only to the organization of origin (sending organization) ready to be authorized;
- The newly authorized request becomes visible to the organization where the posting takes place (receiving organization);
- The authorized request becomes automatically visible to the Receiving organization or the local related office where the posting takes place;
- The receiving organization, where the posting takes place, accepts and stores the request with its own rules;
- Any future change to the request for exoneration (irregularity, variation of workers or other) will be visible to:
  - Building Company;
  - Sending organization;
  - Receiving organization
- All requests collected within EUPOST-LAB DATABASE will remain available for future queries and statistical analysis by all authorized users (each for their own tasks or role).

Below there is a summary of the flow as described.



## 2.7 DATA ACCESS SCHEMATICS

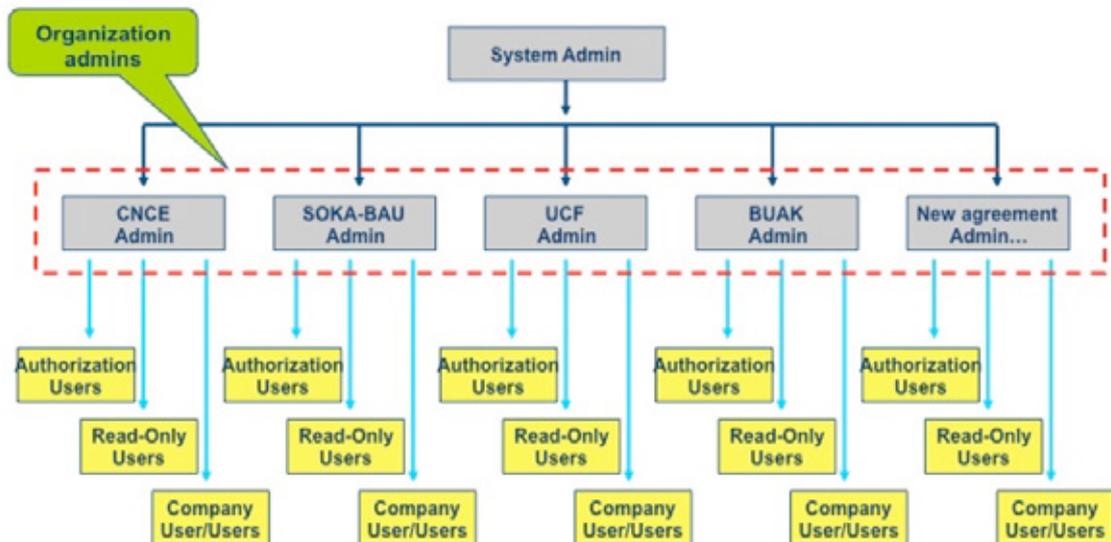
The process of creation of the database also needed to structure the access to the platform and to different tasks according to the type of user. In particular:

- All accesses are made via a web interface requiring username/password (authentication credentials);
- There are 5 types of users, all strictly personal:
  - a. System admin
  - b. Organization admin
  - c. Authorization users
  - d. Read-only users
  - e. Company users

In the previous logic, two types of special users have the possibility to create access credentials for other types of users, more exactly:

- The “System Admin” creates and assigns to each organization the users “organization admin”;
- Each organization, through the user “organization admin”, creates all the other types of users required (company, authorization, read-only).

Here is the scheme of the logical organization of the type of users.



## 2.8 THE USERS ROLE DETAILS

The individual roles by type of user are described below.

### System Admin

- It is the only utility manager for the entire system
- It is a technical / maintenance role
- Creates “Organization admin” users for individual organizations
- Can create “Authorization user”
- Can create “Read-Only user”
- Can monitor the users of the entire system

## **Organization Admin**

- A single user is created for a single organization
- It is a technical / maintenance role
- Create "Authorization user(s)" of the organization
- Create the "Read-Only user(s)" of the organization
- Create "Company user(s)" for businesses
- Can monitor the status of all users in your organization

## **Authorization User**

- It is created by the "Organization admin" of the organization of reference
- Multiple users of this type can exist for each organization
- It is the user who authorizes, modifies and revokes the exoneration request
- Can view all requests for exoneration from the organization
- Can display and analyse statistical data

## **Read-Only User(s)**

- It is created by the "Organization admin" of each organization
- Multiple users of this type can exist for each organization
- Can view all requests for exoneration from the related organization
- Can monitor the status of users linked to companies by the related organization
- Can display and analyse statistical data

## **Company User(s)**

- It is created by the "Organization admin" of the organization where the request for exoneration is available
- Multiple users of this type may exist for each company (at the discretion of each organization)
- Can insert and fill out exoneration requests for their own company
- Can view the status of exoneration requests related to their own company

## 2.9 DESCRIPTION OF THE NEW PROCESS

The new process of information sharing entailed by the setting up of EUPOST-LAB WEB works as follows.

Each organization will have access credentials as "Organization admin" (just one for each organization). Through the interface EUPOST-LAB WEB the "Organization admin" creates - at least - the "Authorization user(s)", needed to fill the exoneration requests. The "organization admin" creates the credentials (Company user) for the enterprise and in compliance with its own rules the organisation (sending organization) provides the company the newly created credentials necessary to access the EUPOST-LAB WEB portal.

The company accesses the EUPOST-LAB WEB portal and finalises the exoneration request. Then, the EUPOST-LAB WEB system automatically identifies the organization responsible for the request and makes it available to the "Authorization user" of the organization concerned.

It is up to the "Authorization user" to evaluate the request and, if appropriate, to authorize the exemption through EUPOST-LAB WEB. The POST-LAB WEB system automatically identifies the appropriate destination and immediately makes the approved request for exoneration visible to all three the competent subjects (company, sending organizations and receiving organization).

Here follow the images of the forms used in the compilation of the exemption request by the company

First step: company data entry.

**Building company, after web authenticated, to insert a new exoneration request:**

**Step 1**  
insert company and work data

**Step 2**  
click on "insert posted worker" to insert a single worker...

**Informazioni impresa**  
Codice Cassa: AB123  
Ragione sociale: Ditta Lavori Generali SRL  
Nome titolare: Mario Rossi  
Via: Strada Privata Num.: 12  
CAP: 00100 Comune: Roma Prov.: RM  
Telefono: 0012345678 Fax: 06123456789  
Email: email@ditta.it

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Via: Piazza Aperta Num.: 23  
CAP: 00200 Comune: Milano Prov.: MI  
Attività svolta: Descrizione dell'attività

**Informazioni appaltante**  
Nome appaltante: Ditta Appaltante SPA  
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CAP: 00300 Comune: Milano Prov.: MI  
Data inizio lavori in Italia: 03/04/2018  
Data fine lavori in Italia: 03/04/2018  
Documenti lavoratori distaccati:

The ensuing steps have to be repeated for every single posted worker.

...System shows worker insert form

**Step 3**  
insert worker data

**Step 4**  
click on "Send" to store a single worker in company request

Carico lavoratori

ANCC  
COMMISSIONE NAZIONALE  
PANTECA PER LE CASE EDILI  
Elenco dei lavoratori dotati

Nome: Giacca  
Cognome: 999  
Data di nascita: 02/02/1989  
Via: Via Poente  
CAP: 12345  
Comune: Palermo  
Data fine del lavoro: 03/06/2018  
Send

Building company, come back to company data form and...

...can repeat **Step 2 to 4** to insert all its posted workers

Dichiarazione Società

ANCC  
COMMISSIONE NAZIONALE  
PANTECA PER LE CASE EDILI  
Dichiarazione dell'impresa per la richiesta di essere dell'iscrizione alla Casa Edile

Aggregazione impresa  
Codice Casa: AB23  
Ragione sociale: Edil Lavori Generali SRL  
Nome titolare: Mario Rossi  
Via: Strada Poente  
CAP: 00000  
Comune: Roma  
Data inizio lavoro in Italia: 01/04/2018  
Data fine lavoro in Italia: 03/06/2018

Aggregazione cantiere  
Denominazione cantiere: Edil Appaltatore SRL  
Via: Piazza Aperta  
CAP: 00000  
Comune: Milano

Aggregazione appaltatore  
Nome appaltatore: Edil Appaltatore SRL  
Via: Via Qualunque  
CAP: 00000  
Comune: Milano

Comunicazione lavoratori dotati

It has to be noticed that:

- All requests for exoneration are automatically forwarded by the system to the appropriate organization responsible for its authorization (sending organization);
- As long as the request for exoneration remains in the 'unauthorized' status, it is only visible to the applicant company and to the organization in charge of authorizing it (sending organization)
- The elaboration by the system makes the authorized request immediately visible also to the destination organisation (receiving organization)
- All authorized requests become part of the EUPOST-LAB DATABASE that can be consulted in detail only by those directly involved (building company, sending organization, receiving organization)
- All statistical aggregate data of all requests passed on EUPOST-LAB DATABASE can be consulted by all the organizations signing the agreements and, upon authorization, by other relevant bodies.

