

ACCESS TO INFORMATION ON THE POSTING OF WORKERS

Construction Companies' Practices and Challenges



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THE CROSS-NATIONAL MIXED METHODOLOGY APPLIED IN THE BOOK: MAPPING AND EVALUATING INFORMATION CHANNELS ON POSTING

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Introduction

This chapter describes the mixed method approach applied in the INFO-POW research project. The project's data collection and analysis methods follow the research objectives and the specific research questions the project sought to answer. In this regard, the project aimed to present **a systematic analysis of the existing information channels** available to posting and user companies in five case countries (Austria, Belgium, Italy, Slovakia, and Slovenia) from an objective perspective via a mapping analysis and desk research. Next, the project also aimed to gather original data from the **subjective perspectives of the information-providing actors**, such as representatives of the public authorities, social partners, and private companies, through semi-structured qualitative interviews. Finally, to complete the picture of the information provision landscape in posting, the project also gathered data from the users and the target of such information, i.e., companies. To do so, the project launched and fielded an original pilot survey to collect data on **the experiences and perspectives of the posting and user companies** in the construction sector on their current experiences and challenges faced accessing information on posting and their preferences for the future of posting activity.

Across all three data collection strategies, the project placed participatory practices as a key dimension to substantiate the results, facilitate feedback loops with stakeholders, and ensure the upscaling and

sustainability of the project activities and results. To this end, an online stakeholder consultation workshop was organised in January 2023, where the findings from the mapping of information channels were shared with the stakeholders at the national level of the partner countries as well as at the EU level. Since the project focused on posting in the construction sector, the stakeholders selected were active, particularly in this sector, such as employer organisations and trade unions covering construction. In this consultation workshop, one session was also dedicated to discussing and collecting feedback from the stakeholders and the survey development experts on the first draft questionnaire of the INFO-POW survey. At the end of the project, an upscaling transnational event was organised with policymakers, enforcement agencies' representatives, social partners, and other stakeholders at the EU and national levels to disseminate the results of all three methodologies and the answers to the key project research questions, present some of the best practices uncovered, and discuss policy recommendations developed based on this new evidence.

It is important to note that while each of the three data collection strategies was undertaken at the national case level, resulting in country analyses of each case (which are available in this volume, chapters 3–7),² the project also aimed to provide comparative accounts of the information landscape and the perspectives of the information providers and users. Therefore, data collection and analysis of each method were determined at the project level and applied in the same manner in each country to ensure comparability of the findings when looking at the results from each case. Specific measures taken in each methodology are briefly described in the country-specific chapters of the present edited volume and the technical reports of the data collection in the project (Danaj, Kayran, and Prinz, 2023; De Smedt et al., 2023a).

The main research questions that we selected to address in the INFO-POW project are:

1. How do transnational posting undertakings and user undertakings find and use information on the posting of workers?

2 See also the INFO-POW country reports on Austria: Danaj, Kayran, Zólyomi, Prinz, & Geyer 2023; Belgium: De Smedt & De Wispelaere, 2023; Italy: Cillo & Perocco, 2023; Slovakia: Kureková, Moran, Kováčová, & Studená, 2023; and Slovenia: Vah Jevšnik & Toplak, 2023.

- a. What are the public and private channels of information on the posting of workers available to posting undertakings and user undertakings in each country?
 - b. What information is available? How accessible is it? And what is the quality of the information available?
 - c. What are the best practices identified?
2. How do posting undertakings and user undertakings assess the availability, accessibility, and quality of the available information on the posting of workers?
 3. How can access and quality of information on the posting of workers be improved to address the needs of posting undertakings and user undertakings?
 4. What are the differences across the five countries of Austria, Belgium, Italy, Slovakia, and Slovenia regarding information availability, accessibility, and quality on the posting of workers?

The project research team applied a multi-method approach to address the questions wherever relevant. For instance, the different dimensions of the characteristics of the information channels (i.e., availability, accessibility, quality) are evaluated from all different data sources collected by the project. Likewise, the differences in the case countries were analysed comprehensively, considering data gathered from different methodologies.

The rest of this chapter provides the key conceptual and methodological choices applied in the project to explain how the data used in the country case chapters were collected and analysed. We, thus, proceed by defining the conceptual terms that were used in the project, which were instrumental in the different methodologies: (1) design of the mapping indicators, (2) semi-structured interview questions, and (3) survey question items and analysis. After this, we present the details of the methodologies applied in the three main data collection methods since they were implemented specifically for the project goals. The chapter concludes with illustrations of how the mixed methodology was applied in the project and some reflections on the limitations.

Key Concepts and Terminology

In this section, we define the key terms relevant to the project's research design, namely, what constitutes “information” and “channels of information” in the context of posting activity. The empirical focus of the project lies in identifying and systematically assessing the information channels available to companies active in posting in the construction sector. To achieve this, it is essential to have uniform and concrete definitions of what constitutes a piece of information and, more importantly, an information channel to be evaluated. Taking stock of extant research in the field (Čaněk et al., 2018; Cukut Krilić et al., 2020; Danaj & Zólyomi, 2018; Danaj et al., 2021; De Wispelaere et al., 2021; Eurofound, 2020; Jorens & De Wispelaere, 2019; Kováčová et al., 2021; Zólyomi & Danaj, 2019), **information on the posting of workers** is defined as content on rules, rights, obligations, entitlements, procedures, sanctions, redress (complain and/or appeal), and institutions relating to the posting of workers presented in descriptive, instructive, and/or otherwise guiding format. This information might cover policy areas such as employment relations, labour mobility, migration, company law, temporary agency work, taxation, social security, occupational safety and health, collective bargaining, holiday pay, severance pay, monitoring and enforcement, subcontracting and liability, and health insurance. We have used this definition of what constitutes “**information**” in the context of the posting of workers **to determine the categories of content topics** we examined across the channels. Our definition of this term, thus, is reflected in our data collection, particularly in the mapping and survey methodologies.

Next, **channels of information** are defined as online and offline means of distributing content on rules, rights, obligations, entitlements, procedures, sanctions, redress, and institutions relating to the posting of workers. This definition of how we conceptualise channels of information guided the institutions and actors we consider as information providers, underpinning the method in interviews, and which channels need to be assessed from the companies' perspectives using such information underpinning the method in the survey. Notably, we use this definition of what constitutes a channel of information to determine our scoping and population form, in which we sampled information channels in the mapping exercise. This definition

guides our inclusion and exclusion criteria for the mapping, which are described in more detail in the relevant section below.

Based on a review of earlier work (see, for instance, Cremers, 2020; Danaj et al., 2021; Eurofound, 2020) and the specifications for access to information prescribed in the 2014/67 Enforcement Directive (Article 5), we have selected multiple dimensions to be used as main themes of our assessment of the information channels. In this respect, when designing the data collection method for our empirical studies' specific needs and target groups, we mainly focus on these aspects. First, we consider and identify the **information provider** of the channel, which we define as the type and characteristics of the entity providing the information that is responsible for the channel. Such providers can be state or non-state actors and different types of institutions and organisations. The second theme we used across the project is **availability**, which refers to the format and type in which the information is provided (e.g., online or offline), as well as whether the information can be accessed by everyone or a limited number of actors. Next, we define **target groups** as those to whom the information provided is targeted (e.g., only at undertakings posting to the country or those posting from the country).

Accessibility and quality are used jointly and defined as whether the information is provided in an easily accessible format that is clear and understandable to numerous audiences, which can be related to language, medium of presentation, or clarity of the information. As part of quality, we also consider the recency of the information and whether it is up to date. Lastly, we consider the **scope and content** conceptually important and define whether the information provided addresses the target audience's information needs and concerns related to the posting of workers, particularly from the perspective of user or posting undertakings. In this respect, in terms of scope, we refer to the content categories defined above and explicitly ask wherever relevant (such as in the survey) whether the information is useful for the companies.

Depending on the methodology, these five concepts (namely information provider, availability, target group, accessibility/quality, scope/content), as themes, have different implications. For instance, in the case of mapping, we use these themes as the main dimensions of indicator

development to assess the channels. In the interviews, we use some of the themes to organise and determine the questions that we asked to information providers. Finally, in the survey, the information provider and target group are used to organise the question design, and the other themes form the basis as to which the questions were designed for the assessments of the companies.

Description of the Mapping Methodology Applied in the Book

The main objective of the mapping exercise was to provide a systematic identification of existing channels of information and to map the different dimensions and characteristics of the currently available information, online and offline. As the first step of the research design of the mapping, we have defined rules of inclusion and exclusion of the channels that will be included in the sample from each country. Our approach to mapping considers both online and offline information channels provided by the state (the national and EU posting websites; institutional websites) and non-state actors (social partners, NGOs, consultancies) in each of the five countries. It covers all sectors of activity to avoid missing relevant channels of information. The list of channels was then narrowed down to construction to trace any sector-specific channels. We determined our scope by following our definitions of what constitutes information and an information channel. Table 1 below presents the included and excluded information sources and provides an overview of the population of information channels that we considered in our mapping.

As the next step, we decided on how to measure the five themes of assessment that we conceptually determined in the project (information provider, availability, target groups, accessibility and quality, and scope and content). We have created multiple indicators which capture each theme's different dimensions. Our empirical strategy was to target a balance between the exhaustiveness of the dimensions and the feasibility of the indicators,

which lend themselves to being coded in a within- and between-country comparative design of the channels.

Table 1: Types of included and excluded information channels.

Included		Excluded	
Online	Offline	Online	Offline
EU institutions' websites that have specific information for your own country's case study	Institutional offices with visiting hours	Academic publications	Out-of-print brochures, fliers, and manuals that cannot be found online
EU social partners' websites that have specific information for your own country's case study	National social partner offices with visiting hours	Overall project pages and project outputs that are not listed in the online and offline items	
National posting websites	Information focal points/offices accessible to the target audiences		Newspaper articles
National institutions' websites: ministries, monitoring and enforcement agencies and sector-specific agencies	Manuals	Personal blogs	Events with a different thematic focus where posting is mentioned briefly
National social partner websites at the confederation and sectoral (construction) levels	Brochures/fliers		
Regional and local institutions' websites	Offline informative events: workshops, seminars, info-days		
Private services websites: accounting, legal, or broader scope consultancies	Offline trainings		
Other designated posting pages			
NGO websites			
Online informative events: workshops, seminars, info-days			
Online brochures or manuals			
Online trainings			
Audio-visual content: videos, audio podcasts, posters, infographics			

Table 2 below presents the overview of the five themes and the indicators we have selected to measure these themes. Further details of the indicator categories are available in the dataset's codebook (see Kayran et al., 2023). To not lose information when the coders encounter an observation outside of these pre-determined options, the mapping research design and the tool developed for data collection leave room for qualitative entry respective to each indicator for write-ins and notes from the coders.

Each country's project partner expert team has undertaken the national coding for their country's case for the mapping exercise. This allowed the coding to be done by researchers familiar with the posting context of the national case and those with language skills of the cases. The research project coordinators have designed the mapping tool research design, themes, coding rules, and indicators in close cooperation with the national experts who have conducted the data collection, allowing a good understanding of the coding rules and sampling strategy across the cases. To ensure the cross-national comparativeness of the coding, the research design team has reviewed the coding of the national mapping with two interim coding checks. The research design team has also checked the face validity of the coded indicators to ensure inter-coder reliability, and revisions of disagreement areas were discussed with the country experts, finding a solution that suited both the national context and comparability.

The research teams utilised the single national posting websites and their prior experience with postings of workers to identify pertinent actors who provide information to posting undertakings/user undertakings while coding the information channels. Each team scanned the web for relevant sources in their national language and English, using the search term "posting of workers to/from COUNTRY." The web research was supplemented with additional terms such as "information", "notification", "minimum wages", "working times", "safety", "social insurance", "user undertakings", "work permits", and "sanctions" in relation to postings.

Table 2: Key themes and indicators used for the information mapping exercise.

Theme:	Information provider	Availability	Target groups*	Accessibility & Quality	Scope & Content**
	Name of the information provider	Online vs. Offline	Posting companies to AND/OR from the country	Language availability (other than the national languages of the country)	Working times and work hours
	Type of actor (State vs. non-state)	If online, type of institution responsible for the channel	User undertakings inside AND/OR outside of the country	Availability in English	Occupational health and safety
	Type of actor (the type of institution providing the information)	If online, type of online channel	Workers posted to AND/OR from the country	Information equivalency between different versions	Minimum wages and collective agreements
	Funding type of the actor providing the information	If offline, type of institution responsible for the channel	Sector-specific information or targeting broadly posting	Recency of the information/time-liness	Registration for social insurance and contributions
	Governance level of the institution providing the information	If offline, type of channel		Accessibility of the information presentation	Work permits
		If offline, the distribution method of the channel		Connection to external resources and relevant links	Overtime and other additional wage supplements
		Cost of access to the information (both offline and online)		National contact point/person availability	Leave and holidays
				Links to external foreign national posting websites	Facilitating information targeted at companies
				Social media accounts	Sanctions and enforcement in case of non-compliance
					Redress, appeal, and compensation

Note: *The coding for the target group items is not mutually exclusive and allows the coders to select more than one type of target audience. **Each of these content items is coded both regarding whether they inform “posting to” or “posting from” country. Researchers also have the option to include additional content items that are not covered by the indicators here.

As a result, the INFO-POW overall sample of mapped channels includes a total of 182 channels distributed across five countries. Looking at this by country, the mapping dataset comprises 36 channels in Austria, 21 channels in Belgium, 38 channels in Italy, 36 channels in Slovenia, and 41 channels in Slovakia. A significant share of the sampled channels are online sources, exceeding 90% of the sample, while offline sources constitute a modest proportion. We note that this is not necessarily a representative picture of the extant information available offline since the research on mapping consisted of conducting desk research. Therefore, while we contend that our coverage of the online information channels is relatively comprehensive, we concede that the offline information channels we have been able to sample are not exhaustive of the potential sources in the field. The culmination of the mapping dataset is made publicly available with supporting data material and documentation for further use or upscaling (Danaj, Kayran & Prinz 2023; Kayran et al., 2023).

Description of the Methodology of the Semi-Structured Interviews Applied in the Book

The main objective of the interviews was to collect insights and recommendations on improving access and use of available information for posting construction companies and user undertakings from the perspective of the information providers. Thus, the preparation of the interview questions has also been built on the results of the mapping exercise that we conducted in the period December 2022–March 2023. In addition to collecting new data on aspects that cannot be captured by the other methods used in the project, such as stakeholders’ reflections on the quality of the available information on posting in terms of accuracy, accessibility, and use/application of information, the interviews (wherever

relevant) were also used to get feedback on whether any crucial information channels were missed in the mapping exercise.

We determined categories for “information providers”, which were used to select the interviewees for the data collection. In this regard, we have purposefully selected national-level stakeholders from the following groups: (1) representatives of public authorities and enforcement agencies (e.g., labour inspectorates), (2) social partners, (3) policymakers, (4) private actors/consultants (lawyers, accountants), and (5) national representatives from the European Labour Authority (ELA). Thus, in each case country, we aimed for a minimum of five interviews. Wherever feasible, the project also targeted a good balance of different actors of information provision, aiming to ensure a representative from each of these five groups, which was largely achieved in almost all case countries (see Table 3 below).

Table 3: Overview of the semi-structured interviews conducted with information providers.

Country	Interview field period	Total number of interviews	Represented organisations
Austria	March–April 2023	10 interviews	Federal Ministry of Labour and Economy (x2), Ministry of Finance, Construction Workers’ Annual Leave and Severance Pay Fund (BUAK), Austrian Health Insurance Fund, Federation of Social Insurances, Austrian Federal Chamber of Commerce (WKO), Chamber of Commerce Tyrol, Chamber of Commerce Carinthia, Private law company
Belgium	March–May 2023	5 interviews	2 Belgian trade unions (ABVV and ACV, National Social Security Office (RSZ – ONSS), Employers’ organisation in the construction sector (Bouwunie), Payroll consultancy
Italy	January–May 2023	5 interviews (8 respondents in total)*	Italian Association of Construction Companies (ANCE), Confindustria Vicenza, National Bilateral Construction Industry Board (CNCE), Friuli Venezia Giulia Region, Financial and labour consultancy
Slovakia	March–April 2023	6 interviews (8 respondents in total)*	2 National institutions (the National Labour Inspectorate and Social Insurance Agency), European Labour Authority, Law firm, Trade union, Employers’ association
Slovenia	March–April 2023	6 interviews	Health Insurance Institute of Slovenia, Chamber of Craft and Small Business of Slovenia, Chamber of Commerce and Industry of Slovenia, regional branch (Maribor), European Employment Services (EURES), Posting undertaking, Accounting consultancy

Note: *In some interviews, more than one interviewee representative of the organisation was present.

The same questionnaire is used in the five countries to ensure that the collected information is cross-nationally comparable (see “Annex 1: Interview Protocol”). The questionnaire follows a semi-structured format using open-ended questions developed by the INFO-POW coordinating team lead and was distributed to all project partners. The questionnaire was designed for a 45-to-60-minute-long interview, accompanied by an interview protocol. The protocol serves as a guide for the semi-structured interviews and contains details about gaining informed consent before the interview, a script to open and close interviews, and prompts for the open-ended questions.

All interview participants were explicitly asked for their permission to participate in the interviews (written consent form adhering to GDPR guidelines) and whether to use the provided information directly or in an anonymous format, ensuring that their responses are not recognisable in the text. In the analyses, respondents’ quotes and contributions are discussed without revealing the identities of the interviewees. As with the mapping exercise, the expert project partners in each of the five countries conducted the participant recruitment and fieldwork for their own national case studies. The qualitative data from interviews were transcribed and then analysed using qualitative thematic analysis based on Guest, MacQueen, and Namey (2012). The themes used to analyse the interview data were also partly drawn from the findings of the desk research and mapping exercise.

Description of the Pilot Survey Methodology³

The main objective of the data collection and analysis through the survey was to obtain the perspectives, experiences, and challenges faced by the companies when accessing information on posting. This last research methodology component complements our latter two data collection strategies. To the best of our knowledge, it brings in the user perspective, which breaks ground as a new form of empirical perspective in the field.

³ For further details on the survey methodology see “INFO-POW Survey Manual” (De Smedt & De Wispelaere, 2023).

Following this research goal, the population for which the study is targeted is posting and receiving companies in the construction sector in the five case countries (Austria, Belgium, Italy, Slovakia, and Slovenia). The survey could be completed in all the relevant national languages (English, Dutch, French, German, Italian, Slovak, and Slovenian).

The questionnaire was designed for a 15-minute online survey with mostly close-ended questions. Some open-ended questions were included to collect additional comments and suggestions. The questionnaire consisted of the following three modules:

- Module 1: questions about the availability, accessibility, and quality of information when sending a worker to another Member State temporarily or receiving a worker from another Member State in the context of posting,
- Module 2: questions about the posting activity in the company (such as the number of workers posted or received by the company and the latest year of posting activity) and
- Module 3: questions about the company's profile (such as the country in which the company is registered as a legal entity, the size of the company, and the sector of activity).

Particularly, questions in Module 1 included various aspects on the channels through which the companies have searched for information, the most common channels used, their satisfaction thereof, questions on barriers as well as future-oriented suggestions and preferences when getting information on posting. Since posting and receiving companies have different obligations in terms of posting of workers⁴ and different information needs, certain survey questions either differed between the two groups or were only asked of one group.

Before fielding the survey, we pre-tested our questionnaire both for content and technical aspects. In terms of content coverage and questions, a stakeholder consultation took place in January 2023, where feedback was provided on the survey, as discussed in the introduction. Additionally,

⁴ Mainly posting companies have obligations regarding the terms and conditions of employment to be respected and administrative requirements. Receiving companies have fewer obligations.

each country's expert team has conducted content, technical, and language checks on the questionnaire. The survey was fielded from 30 March to 17 August 2023. In line with the GDPR (General Data Protection Regulation), the survey responses were confidential and no sensitive or identity data were requested. The survey participants were informed about their rights in the invitation to participate and at the beginning of the survey.

Our population consists of companies that represent a target group that is difficult to reach and achieve a high level of responses. Furthermore, the difficulty in getting responses was expected to vary greatly between the different country cases. Therefore, to maximise the number of responses, we used multiple dissemination channels to diversify the reach of our strategy in collaboration with the stakeholders.

The research teams approached potential respondents through either publicly available sources or public authorities and employer associations. In specific cases, private actors like consultants and recruitment platforms were asked to distribute the survey to their clients. A more detailed account of the national strategies and stakeholders involved in disseminating the survey is presented in the Survey Manual (De Smedt et al., 2023a). In addition to the individual dissemination strategies, we have also used the Orbis database, a database from Bureau van Dijk that contains (non-) financial information from private companies worldwide, currently close to 400 million companies and entities.

Overall, the sample collected from our online survey included 121 companies. Among these 121 companies, 82 are posting, and 39 are receiving companies. Looking at the samples in each country, we have 26 responses from Austria, 39 responses from Belgium, 9 responses from Italy, 18 responses from Slovakia, and 29 responses from Slovenia.

Concluding Remarks

In terms of the limitations of our methods, it is important to highlight some of the aspects regarding the survey component of our research design. Although many steps were taken to ensure the survey's quality,

our sample is not representative of posting and receiving companies active in the construction sector in the five countries. Moreover, since the total population of posting and receiving companies cannot be determined in each of the Member States, the descriptive results discussed in the analyses cannot be adjusted with weighting. Considering that our survey is a pilot survey, as it is the first in the field in this particular population, the collected data sample is a convenience sample. Therefore, our descriptive results presented below should be taken with caution and are not generalisable. Likewise, we refrain from inferential statistics considering the sample size. Finally, small companies and self-employed companies in posting are more difficult to reach and are less likely to complete the survey. Furthermore, in online surveys, unlike in-person or telephone surveying, respondents could rush through the survey without carefully reading each question and response option, which we considered when cleaning our survey response data before the analysis stage by looking at the survey responses. For further information on the limitations of the survey methodology, technical information about the survey, and a comparative overview of the sample, please see the survey manual (De Smedt et al., 2023a) and the comparative report on the survey (De Smedt et al., 2023b).

Nevertheless, the mixed methodology applied in the project has provided original information on different aspects of using information in the posting activity. Altogether, the methodologies used cover perspectives from the users (i.e., companies) and the information providers and examine both existing channels and future needs. The following chapters in this volume, presenting the case studies from each country, benefit from this integrated approach to data collection with multiple methodologies.

Finally, both in the company survey and the mapping exercise, the project aimed to break new ground in a research area that has not been previously systematically studied. Therefore, while these data collection efforts are considered exploratory at this stage, the technical reports and our analyses presented here demonstrate ways in which the knowledge base in the field of posting and, in other fields and policy issues, would benefit greatly from more systematic evaluations of information provision. Empirically, the method we developed charts a fruitful research avenue for further expansion of the geographical scope of the mapping dataset and

the company survey design from the five project cases to the wider EU-27 Member States. For both methods, covering the EU widely would be useful not only to researchers for a more comprehensive study of the extant state of the information (objectively and subjectively) in different policy areas, including posting activity, but it would also benefit national stakeholders in other Member States in assessing their own channels of information.

References

- Čaněk, Marek, Kall, Kairit, Lillie, Nathan, Wallace, Amelia, Haidinger, Bettina (2018). *Transnational Cooperation among Labour Regulation Enforcement Agencies in Europe: Challenges and Opportunities Related to the Posting of Workers*. Brussels: Solidar. <http://doi.org/10.13140/RG.2.2.25125.19687>.
- Cillo, Rossana, Perocco, Fabio (2023). *INFO-POW: Assessment of the Channels of Information and Their Use in the Posting of Workers. Country Report Italy*. Venice: Ca'Foscari University.
- Cremers, Jan (2020). Market Integration, Cross-Border Recruitment, and Enforcement of Labour Standards– A Dutch Case. *European Integration and the Reconfiguration of National Industrial Relations: Posted Work as a Driver of Institutional Change*. (eds. Jens Arnholtz, Nathan Lillie). London: Routledge.
- Cukut Krilić, Sanja, Toplak, Kristina, Vah Jevšnik, Mojca (2020). *Posting of Third Country Nationals: A Comparative Study*. Ljubljana: ZRC SAZU, <https://www.euro.centre.org/publications/detail/3929>.
- Danaj, Sonila, Zólyomi, Eszter (2018). *Occupational Health and Safety of Posted Workers in the EU: A Comparative Report*. POOSH – Occupational Safety and Health of Posted Workers: Depicting the existing and future challenges in assuring decent working conditions and wellbeing of workers in hazardous sectors. Vienna: European Centre for Social Welfare Policy and Research, <https://www.euro.centre.org/publications/detail/3354>.
- Danaj, Sonila, Kahlert, Rahel, Zólyomi, Eszter, Prinz, Nicolas, Sandu, Veronica (2021). *The Gap between Legal Procedures and Practices in Posting Rule Enactment: A Comparative Working Paper*. Vienna: European Centre, <https://www.euro.centre.org/projects/detail/3633>.
- Danaj, Sonila, Kayran, Elif Naz, Prinz, Nicolas (2023). *Information Channels Mapping Tool Cross-National Dataset - Technical Report*. Vienna: European Centre, <https://www.euro.centre.org/publications/detail/4689>.

- Danaj, Sonila, Kayran, Elif Naz, Zólyomi, Eszter, Prinz, Nicolas, Geyer, Leonard (2023). *INFO-POW: Assessment of the Channels of Information and Their Use in the Posting of Workers. Country Report Austria*. Vienna: European Centre for Social Welfare Policy and Research, <https://www.euro.centre.org/publications/detail/4799>.
- De Smedt, Lynn, De Wispelaere, Frederic (2023). *INFO-POW: Assessment of the Channels of Information and Their Use in the Posting of Workers. Country Report Belgium*. Leuven: HIVA-KU Leuven, <https://www.euro.centre.org/publications/detail/4795>.
- De Smedt, Lynn, Zólyomi, Eszter, Kayran, Elif Naz, De Wispelaere, Frederic, Danaj, Sonila (2023a). *Survey Manual of the Survey on Posting and Receiving Companies in the Construction Sector*. INFO-POW project. Vienna: European Centre for Social Welfare Policy and Research, <https://www.euro.centre.org/downloads/detail/4847>.
- De Smedt, Lynn, Zólyomi, Eszter, Kayran, Elif Naz, De Wispelaere, Frederic, Danaj, Sonila (2023b). *Comparative Report of the Survey on Posting and Receiving Companies in the Construction Sector*. INFO-POW project. Vienna: European Centre for Social Welfare Policy and Research, <https://www.euro.centre.org/downloads/detail/4846>.
- Eurofound (2020). *Improving the Monitoring of Posted Workers in the EU*. Dublin: Eurofound.
- Guest, Greg, MacQueen, Kathleen M., Namey, Emily E. (2012). *Applied Thematic Analysis*. SAGE Publications, Inc. <https://doi.org/10.4135/9781483384436>.
- Jorens, Yves, De Wispelaere, Frederic (2019). Intra-EU posting: looking for solutions: a Herculean or a Sisyphean task? *BTSZ/RBSS*, 61/1, 113–138.
- Kayran, Elif Naz, Danaj, Sonila, Zolyomi, Eszter, Cillo, Rossana, De Smedt, Lynn, De Wispelaere, Frederic, Kováčová, Lucia, Moran, Alexandra, Perocco, Fabio, Prinz, Nicolas, Toplak, Kristina, Vah Jevšnik, Mojca (2023). *INFO-POW: Information Channels Cross-national Mapping Tool Dataset*. Vienna: AUSSDA. <https://doi.org/10.11587/HS6WHC>.
- Kováčová, Lucia, Studená, Ivana, Kureková, Lucia Mýtna (2021). *Bridging the Gap between Legislation and Practice in the Posting of Workers: Slovakia Country Report*. Bratislava: Slovak Academy of Sciences.
- Kureková, Lucia Mýtna, Moran, A., Kováčová, Lucia, Studená, Ivana (2023). *INFO-POW: Assessment of the Channels of Information and Their Use in the Posting of Workers. Country Report Slovakia*. Bratislava: Centre of Social and Psychological Sciences, Institute for Forecasting, Slovak Academy of Sciences.
- Vah Jevšnik, Mojca, Toplak, Kristina (2023). *INFO-POW: Assessment of the Channels*

of Information and Their Use in the Posting of Workers. Country Report Slovenia.
Ljubljana: ZRC SAZU.

Zólyomi, Eszter, Danaj, Sonila (2019). *Language Barriers and the Occupational Safety and Health of Posted Workers*, Policy Brief 2019/4. Vienna: European Centre.

ANNEX 1: INTERVIEW PROTOCOL

Introductory protocol

Welcome: Thank you for agreeing to do this interview. My name is [XY], and I'll be talking with you today.

Inform about the research and explain purpose of the interview: Our research project on how transnational posting undertakings and user undertakings find and use information in their interaction with national institutions and how that affects their overall performance in terms of the correct application of the posting rules and the protection of labour and social standards. The study focuses on the specific case of the construction sector as the main sector where posting occurs, and where both larger companies and SMEs as well as self-employed are active.

The purpose of this interview today is to learn more about your experiences with and recommendations related to access and use of publicly available information for posting construction companies and user undertakings. The interview will last about 45-60 minutes.

Obtain informed consent:

[Ask interviewee to read and sign the informed consent form] Participation in this interview is voluntary and everything you tell us will be confidential. We won't connect your name with anything you say. Do you have any questions regarding the consent form?

To facilitate our notetaking, we would like to audio tape our conversations today. For your information, only researchers on the project will have access to the tapes. The information provided will be used only for the purposes of the study and the related research products that will be derived from it. Is it OK if I audio tape this interview today?

If yes: Thank you! Please let me know if at any point you want me to turn off the recorder or keep something you said off the record. You can stop the interview at any time for any reason.

If no: Thank you for letting me know. I will only take notes of our conversation.

[FOR TELEPHONE/TELECONFERENCE: Participant will be sent an informed consent form before the interview. At start of interview, ask if participant has read the consent form and if she/he has any questions about the consent form and if he or she agrees to be interviewed and audiotaped]

Before we start the interview, do you have any questions? [Discuss questions] If any questions (or other questions) arise at any point during this interview you can feel free to ask them at any time. Let me know if during the interview there are any questions that you would rather not answer. Please remember that we want to know what you think and that there are no right or wrong answers.

Introduction/Background

I'd like to begin by asking you some questions about your current job.

Probe: What is your position at [institution/organization]? What are your major responsibilities in your current position? How long have you been with [institution/organization]?

Can you tell me a bit about your work and experience as it relates to the posting of workers?

Probe: particularly for aspects that relate to information dissemination for posting/user undertakings.

Now, let's talk about your organisation.

What is your organisation's experience with engaging posting/user undertakings (or with the topic of posting of workers in general)?

- What prompted your organisation to get involved in this issue?
- Specifically, what activities have you undertaken?

Information provided to posting/user undertakings: content, tools, sources, intra-institutional exchange, dissemination

1 What information have you created and/or delivered?

1.1 What types of content do (did) you disseminate?

- Probes: working time, OSH, minimum wages and CBA, registration for social insurance and contributions, work permits, taxation, over time and other additional wage supplements, leave and holidays, facilitating information targeted at companies, sanctions and enforcement in case of non-compliance, redress, appeal and compensation.

1.2 What tools or resources have you used?

- Probes: online channels (webpages, online workshops, tutorial, videos), offline tools (booklets, brochures, regular consultation hours)

1.3 What are your sources for the information about posting provided by your organization? Or where did you go to look for information?

1.4 Do you exchange with other national or EU institutions/organizations on posting information? (in what form/frequency, with whom)

1.5 At what frequency do you update/provide/deliver information on the topic?

2 How do (did) you disseminate information to posting/user undertakings?

2.1 What channel(s) or mode of delivering information do (did) you use? (Online and/or offline channels e.g. website, flyers, brochures, guides, trainings, workshops, videos etc.)

2.2 How do (did) you engage posting/user undertakings? Do you provide any support with interpreting/decoding the provided information?

- Probe: Is there a contact email or contact number in case of questions? Do you have office hours? Do you provide content with answers to Frequently Asked Questions?

Monitoring and enforcement of the provision of information

3 *What has been the reaction to your activities/efforts?*

3.1 Do you map how well a particular information source/channel is able to reach the respective target group (e.g. web page view counts, number of participants at an event)?

4 *How do you ensure that your information reaches respective employers? Do you take any specific measures? Which ones? Do they work?*

4.1 Do (did) this differ for different types of posting employers/user undertakings?

4.2 If so, what are the different types, and how do their information needs differ?

5 *Was there anything you did that you thought worked well?*

5.1 Among the topics that you have addressed or considered addressing, what types/aspects of information seem to resonate most with posting employers/user undertakings?

5.2 What aspects resonate least?

5.3 What do you think are the priority topics and content areas for posting/user undertakings?

- With what topics do they need the most assistance?

- Where can information affect the most change?

6 *What, if anything, would you do differently?*

Gaps and Challenges in the provision of information

7 *In your view, what are the pertaining information gaps that posting companies continue to face? What is the reason for these information gaps?*

7.1 What opportunities for information dissemination/engagement have not traditionally been used?

7.2 Are there target audiences that have been ignored?

7.3 Are there any differences on information gaps between posting undertakings and user undertakings?

8 *What barriers/challenges would you say posting/user undertakings face when accessing information on the posting of workers?*

- Probe: this could in more general terms, or the information provided by the specific institution/organization.

9 *What challenges are there to providing information to posting/user undertaking?*

- Probe: this could in general, or about the specific institution/organization.

Best practices and recommendations

10 What are the best ways to inform/engage posting/user undertakings?

10.1 Based on your knowledge/experience which is the organization that currently best delivers information on posting? What best practices do they have?

10.3.1 What facilitates those best practices?

10.3.2 What are some challenges to those best practices?

10.1 What are the best way(s) to disseminate information?

- Probe: perhaps they can elaborate on what they consider the best way.
- Probe: perhaps they can mention any best practices in making information available and accessible for posting and user undertakings?

10.1.1 How feasible is this/are these?

10.1.2 What assistance would be needed to implement such tools and resources? What are the best ways to sustain those efforts?

11 Can you recommend any particular print documents or Web resources that your or other institutions/organizations have produced that we should review?

Closing the interview

12 What is the most important message that you want us to take away from this interview?

12.1 Is there anything else that you would like to add about any of the topics that we've discussed or other areas that we didn't discuss but you think are important?

12.2 If you know of any research, tools, or resources that may be useful to include please send them to me.

Thank you for your time and participation in this interview. The information that you provided to us will be very helpful in this project.