

WG Communication group

Context of the action

Main objectives

The aim of the working group (WG) for communication was to build upon and further the work of its corresponding working group from the previous project: To exchange methods of good practice, further develop the idea of cross border collaboration and to produce UDWP specific communication material and follow it through with a joint communication campaign.

The working group met twice physically prior to the Covid-19 pandemic and the online meetings were over twenty. The production cost of communication material was also covered by the project. The first physical meeting took place in August 2019 in Tallinn and the second one in January 2020 in Copenhagen. Online meetings were held regularly throughout the year 2019, and through to April 2021.

The participants in the working group were the following, but in most cases national experts were replaced at some point throughout the project.

Sweden	Arbetsmiljöverket	Maria Weltenius, Åsa Wallin
Norway	Arbeidstilsynet	Kristian Ski
Iceland	Vinnumálastofnun	Edda Bergsveinsdóttir
Finland	Aluehallintovirasto	Virpi Vento, Reetta Aho
Denmark	Arbejdstilsynet	Maja Dalsgaard, Hanne Folmer Schade, Anja Binderup
Estonia	Tööinspektsioon	Liis Naaber-Kalm, Kristel Plangi, Jana Rosenfeld
Latvia	Valsts Darba Inspekcija	Marta Gusare, Megija Ekkerte

Key activities and messages

The previous project provided an insight into the possibilities of collaborating when it came to undeclared work and communication materials. In the previous project the working group didn't utilize online meetings and only had two physical meetings with the aim of producing a single digital material with a joint message without having funding for production, distribution, or other necessary components to carry out a joint campaign.

One of the most promising outcomes from the previous project was that despite different legislations and approaches there are several commonalities to be found between the participating countries. The opportunities are not only in joint production of communication material but in mutual learning and establishing a network of communication experts where the countries involved could share developments, knowledge and seek guidance from their peers.

The working group for communication was given the twofold task to produce a joint communication material to combat undeclared work and to exchange methods of good practice,

present different initiatives and discuss possible approaches concerning communication for combatting undeclared work. The work of the group was to focus on digital media or material which can be distributed digitally. The group was to provide insight into current practices and methods.

Within this scope the group was initially assigned four main activities. The first was to produce a joint campaign that addresses a specific topic within the field of undeclared work and could be targeted at a specific audience. The other three activities aimed to facilitate collaboration and assembling know-how and best practices across borders to communication experts. The group was also free to discuss any other deliverables that could be achieved within the timeframe and the budget.

It must be stated that with the effect of Covid-19 and that this was a new endeavour for everyone involved all initial plans for a timeline were disrupted and expectation needed to be adjusted accordingly. Overall, the working group met its intended activities but not within the initial timeline or format as the project progressed.

The activities were therefore the following:

- Communication film on equal treatment of posted workers
- Joint campaign targeting the buyers of services under the Posting Directive, highlighting their part in undeclared work.
- Kit film on “clean operations” in the cleaning industry
- Digital handbook for communication experts.
- Participation in the EU4FairWork Campaign
- Data gathering on possible commonalities in communication and potential target groups.

Production of the film and the joint communication campaign

The group came up with multiple ideas for the intended campaign and researched several possibilities for the campaign’s potential target group. This activity was by far the most time demanding and is the centrepiece of the working group’s deliverables.

The target group of the film is the buyers of services provided by posted workers. One of the objectives is to increase the buyers’ awareness that posted workers have the same rights to good working conditions as local workers.

The group wanted to highlight the social responsibility of the buyer and his role in supporting undeclared work. With increasing awareness of social responsibility, ethical business practices and even chain liability we found it appropriate to target domestically the buyers bringing in foreign service providers and therefore posted workers into our labour markets. Given the different legal framework on buyer’s responsibility in the seven countries the tone of the film is to not only highlight the legal consequences, but to be personal and evoke emotional response with the viewer.

The main character in the film, Peter, is a business owner – in the film he is presented as a frequent buyer of *services performed by posted workers*. He is not an employer of the posted workers, but they work side by side with his own workers. He is portrayed as an ordinary family man who cares greatly for those next to him but as the film progresses, he becomes more and more aware of the discrepancies between his own workers and the posted ones. This is done through the very different safety equipment provided to the workers, their wages and/or their working hours. Depending on domestic legislation the country version the film addresses minimum wages or

working hours. Subtitles were used to portray either unequal wages or working hours. Subtitles also varied slightly to fit the domestic target group better, such as names and personal details of the characters.

The film production was carried out by an Estonian production firm, with the Estonian communication expert acting as an intermediary and on-site contact for the working group. The outline of the film was drawn up between January and March 2020 and production was carried out during the summer of 2020 in the middle of the Covid pandemic.

The first distribution of the film was carried out during the EU4FairWork campaign in September. During January 2021 Finland, Iceland and Sweden carried out a two-week sponsored campaign via social media platforms for the purpose of measuring reach and to compare outcomes.

“Kit” film

A part of the working groups aim was to highlight that it's not always necessary to reinvent the wheel or to start from zero. Norway volunteered the use of a short film segment designed by the Norwegian Labour Inspectorate in December 2019. The segment is 15 seconds long and features a message that appears on a window as it is being cleaned by an anonymous cleaner. The length of the segment makes it ideal for distribution on social media platforms, particularly those that are primarily visual.

The working group collaborated to produce country specific versions of the short film. The production costs were funded by the project. The countries were given free rein on what the message of this film was, as long as it fit within the realm of undeclared work. The Norwegian text states: “Did you know that it is illegal to buy unregistered cleaning services?”. The Icelandic adaptation was: “Are you aware of the consequences of undeclared work? - how clean are your hands?”. The Finnish version dealt with minimum terms and conditions of employment with the message “Look beneath the surface. Make sure that the company from which you buy cleaning services treats their employees right”.

For measurement purposes Finland was provided with funding to perform sponsored distribution of their version for a two-week period in April 2021. Detailed outcomes of the distribution may be found in the Annex to this report. This was done to compare how the film performed in a different market to the original distribution of the Norwegian version.

Handbook

The handbook is primarily intended for the participating authorities, particularly communication experts and others that wish to incorporate communication to combat undeclared work. The intent is also to preserve information gathered in the second round of the project and facilitate those that wish to reach out to other communication experts for information, advice, and possible collaboration. The aim is to incorporate both challenges in cross border collaboration but also the possibilities for future cooperation building on the previous work in the two projects. The second half of the handbook contains country-specific profiles in terms of communication to provide a small insight into how each authority addresses communication, good examples, strengths and country specific challenges.

Other activities

The working group members were involved in the EU4FairWork campaign and group meetings were used as a platform to discuss ideas and approaches to the campaign. The film on equal rights of posted workers as well as the “Jannis film” from the previous project were distributed during the week of action in September 2020.

In the first months, the working group explored multiple possibilities for common target groups for the upcoming communication campaign. The group made an effort to gather data and information on what the participating countries had in common in terms of prevalence of undeclared work in specific sectors, what were the most common nationalities of posted workers and 3rd country nationals, as well as where those workers were most likely to work sector wise. In the end, most of this data was not used for a campaign but it proved to be a necessary part in bringing the group to a common ground and increasing mutual understanding.

Conclusions

Results of the actions

The working group produced two different films targeting undeclared work. The films are intended for digital distribution via social media and can be used as a stand-alone material or as a part of a larger campaign on undeclared work. The material was distributed and measured by the working group providing insight into reach and impressions depending on the target groups and the domestic markets.

The group also produced a handbook benchmarking the results of the group, and the advantages and challenges in further collaboration in communication. The handbook provides good examples and information on communication practices in the participating authorities.

Impact of the actions

Joint campaign on equal rights of posted workers

In choosing the target group for the film, the group wanted to highlight the legal and social responsibilities of user companies in this context, building on the positive response to the film from the previous project. This is a target group that had been discussed during the previous project as a future possibility as the domestic buyers of services drive the demand for posted workers in the receiving countries. None of the countries had produced similar material and there was room for such a campaign.

It is a very promising outcome that the working group managed to devise and produce a film with a joint message and target group, despite the seven nations involved having different competences and labour market. This shows that a common ground can very well be found when dealing with undeclared work and communication.

The joint campaign was carried out involving the film where three of the participating countries committed to a two-week distribution of the film on social media, with a fixed target group in January 2020, and a follow up distribution for Finland in March 2020. The countries involved were Finland, Iceland and Sweden. This was done for measuring purposes which had not been done before and was lacking during the first project.

This is the first time the authorities have collaborated on and launched the same material with a fixed target group to gain information into the reach of the material and other responses. The combined impressions of the three countries on all platforms were 888.694 views. The platforms used were LinkedIn, Facebook, Instagram, Twitter and YouTube. The numbers are positive as the target groups in each case were rather narrow. It is also apparent that if the aim of a visual campaigns is for a full view of the material, some platforms are better suited. If the aim is rather for initial impressions or for click-throughs to a designated landing pages, the platforms are more even. A distribution platform should be selected in terms of the known inclinations of the target group in question, a broader audience with the aim of views could respond better to Facebook or YouTube where LinkedIn and Twitter may prove well for onsite reach and click-throughs as shown in the Finnish and Swedish results.

This campaign is not a perfect example but a necessary first step in future joint activities. This has provided some indicators for future collaborations, as well as increasing mutual knowledge between authorities. A breakdown of the country specific campaigns is the following:

Distribution numbers from the joint campaign

Finland's campaign was carried out from 18th to 29th of January 2021 and targeted users based on interests and job titles related to human resources management, working life, recruitment, procurement and other topics. In addition, additional version was also made for those who use Facebook in Swedish.

The total impressions for the Finnish campaign were 253.859 with a reach of 94.698. Video viewing times and percentages were at a good level on all channels. On Facebook, almost half of those targeted watched the video for at least 15 seconds. On LinkedIn, about 7.2% of those targeted watched the entire video, and 28% watched it at least 20 seconds. The video was 1 minute and 15 seconds long.

Finland also carried out a measured two-week distribution from 8th to 19th of March 2021 with a 1.000€ budget. Finnish distribution numbers for this second round amounted to 241.302 impressions across four platforms and reach of 85.000 individuals. The most promising platforms were the same as before: Facebook and Twitter, which generated 90% of the impressions and reach in the Finnish market. The total outcome of this second round was promising, considering a minimal drop in distribution numbers between the two campaign periods. The second round gained 95% of total impressions in comparison to the first round in January. This particular outcome is promising for the longevity of the material produced.

Iceland carried out their portion of the campaign from January 26th to February 8th, 2021. The target groups were business owners and business executives, determined by titles and industries as well as age. The platforms used were Facebook, Instagram and YouTube. The campaign was considered successful in the Icelandic market and that the content reached the relevant audience. The total impressions across the three platforms were 237.182 with a reach of 27.137 unique individuals via Facebook and Instagram. The distribution numbers are excellent considering the size of the general labour market.¹ A surprising outcome was the user engagement via YouTube with 38% of impressions leading to at least 30 seconds viewing time. What was even more positive was that 25% of impressions led to a full video view which is very high in such campaigns, particularly considering the length of the film, 1-minute and 13 seconds. The deduction is that the material was both suitable and relevant to the target group used in Iceland. A future possibility

¹ The size of the Icelandic labour market was 209.000 individuals in the year 2020.

would be to produce additional subtitles to the film such as English and Polish to reach non-Icelandic business owners which are also likely to seek out the services of posted workers from their native countries.

Sweden carried out their campaign portion from 19th to 31st of January 2021. They carried out a sponsored campaign on LinkedIn, based on the most common industries for workers posted to Sweden. As a carrier and profession orientated social platform, LinkedIn is suitable for campaigns targeting business owners, managers and other executives. Sweden also distributed the film on Facebook, without sponsoring the content due to technical difficulties with the advertising function.

The total reach of the campaign on LinkedIn was 152.269. Video views amounted to 5.750 and direct visits to the designated landing site. In comparison the unsponsored distribution on Facebook reached 4.082 individuals. However, the user engagement was significantly higher with 2.000 video views despite the distribution being organic and not sponsored. The high user engagement of those reached via the Facebook platform of the Swedish Work Environment Authority partially stems from the fact that those connected to the page are already susceptible to the message and are interested in the topic. The different nature of the two platforms, as Facebook is a more leisure driven platform where a user may be more motivated to view longer film material.

The combined impressions of the campaign were 888.694 with the reach of 393.321 individuals. Overall, the outcome of the campaign was successful, considering the narrow target groups applied to the campaign. More details and material on the outcome may be found in Annex I.

Distribution of kit film

The “kit film” on cleaning operations was adapted and produced for the participating countries and a two-week sponsored distribution was carried out by Finland in April 2021. The results were good for both the Swedish and Finnish versions. The distribution was carried out via the social media channels of Occupational Safety and Health Administrations, these included Facebook/Instagram, LinkedIn and Twitter. Distribution targeted viewers based on interests and job titles related to staffing, recruiting, retail, manufacturing, hospitality, restaurants.

The campaign was thought to be successful with a good level of CPM for all channels, particularly on Facebook and Twitter. The highest number of play-throughs was gained in Facebook.

Overall reach of the campaign during the two weeks was 51.044 individuals and number of impressions was 137.735 views with a total budget of 1170€. A detailed account of the results may be found in the Annex along with results from the Norwegian campaign in 2019.

Considering the budget for the Finnish campaign was approximately 15% of the total budget of the Norwegian campaign, the reach and impression must be considered good and above what could be expected. It can be concluded that the film is very adaptable to a new market and the campaign met its goal. The group considers this to be an example of successful and cost-efficient cooperation.

Difficulties in implementing the actions

The largest hindrance throughout the project has been the Covid-19 pandemic. It significantly delayed the schedule of the working group and impacted the resources and activities of the group often creating conflicting duties for its members. Naturally in such unprecedented circumstances, those duties needed to take precedence. The pandemic cancelled any further physical meetings of the group and forcing the members to finish the bulk of the project via online meetings. The entire preparation, production and post-production of the film was therefore done despite numerous restrictions across workplaces and societies in the participating countries placing increased strain on the Estonian communication expert, who led the production and coordinated the work with the rest of the team through countless emails and online meetings. The execution of the joint production of material in cross-border collaboration usually tends to fall on the country where the production takes place. This is in many ways unavoidable, but this also highlights the advantages of also recycling existing material which decreases the production strain on the country tasked with the execution. There are also other advantages, as this saves time and financial resources and even provides multiple new uses for the country that originally devised the material. This is not always a possibility but should be encouraged in common labour market challenges such as undeclared work and occupational safety and health.

The Covid-19 pandemic affected the campaign both by delaying the timing of the campaign and by creating conflicting duties for the working group members. As the launch of the campaign was pushed from September 2020 to January 2021 the campaign clashed with the communication schedules of some of the countries. However, the campaign must be considered successful despite being carried out in an unresponsive market, with border closures and economic downturns in most labour markets. The campaign addressed the rights of temporary workers in the participating countries where the social dialogue and awareness has prioritized Covid-19 related matters during this time. The campaign filled a gap for raising awareness that would otherwise not have been met, including the right of posted workers to adequate safety equipment and healthy work environment, which in 2020 has emerged as a priority issue for all workers. It can also be expected that the response to the campaign would have been even better had its distribution not collided with the pandemic.

To further elaborate on the challenges in the internal work of the group, the national experts in were personally committed to the goal of the working group, despite the competing tasks and external demands from their daily operations within their own authorities. In the future, experts nominated for cross border communication collaboration should be supported in this work and it should not come as an addition to an already full schedule where the cross-border work cannot be made a priority. For a project to be successful an expert must be given room to provide expertise and that must be kept in mind by those nominating experts into all cross border working group.

Prior to Covid-19 the biggest challenge in carrying out the activities was the lack of available data. When collaborating on material that needs to apply to multiple different labour markets, labour legislation and varying competences, good data is essential. Communication experts are experts in their field but that does not include details on labour market compositions, prevalence of labour law violations and labour related problems. Other essential data would also be information on the most relevant sectors, composition of workers within those sectors, language preferences and social media behaviour of potential target groups. The better the data in the beginning, the better structure and outcome of the communication material. During the initial stages of selecting a potential target group for the campaign the working group explored the possibility of addressing the part of employing of 3rd country nationals in undeclared work. All countries agreed there was a need for a potential information campaign and this was generally an under-represented target

group. However, there are many problems in addressing this group such as language barriers, no data on social media behaviour as a whole or between different ethnicities and nationalities. This raised the question on where these individuals could be reached – domestically or abroad and through which channels. The topic, despite being very relevant, raised too many unanswered questions at the time and exposed the need comparable data in order to carry out a successful joint campaign.

Lessons learned from the action and future work

Physical meetings should be particularly encouraged for communicators and other creative experts. This is undeniably more costly, but the outcome depends on candid and fluid dialogue between those involved in the collaboration. This level of collaboration can only partially be achieved online and is more productive after an in-person collaboration. This is also key to preserve an open line of communication between the experts involved and to maintain a network of peers.

Communication and data analysis should go hand in hand when it comes to selecting the message, target group and appropriate channels. Cross border collaboration in communication should be supported by experts that can provide data and analytical insight into the problem at hand and the prospective target groups of the campaign. This could increase the success of the campaign dramatically, allowing the experts to devise material better suited to the needs of the target group at hand. To conclude: In joint communication actions, it is important to define the boundary conditions and the mutual goal in the very beginning, before starting to plan any actions. To support those decisions, it is essential to have better availability of good, comparable data when determining factors for both the communication material itself as well as the campaign.

Collaboration should not only encourage the production of new material but also to re-imagine and adapt existing material to new target groups and new markets. The “kit film” on clean operations was easily adapted to different markets and messages highlighting cross border collaboration shouldn’t exclusively provide original material. Good collaboration does not need to start from scratch in every case. This sort of collaboration should be encouraged since there are so many similarities in the communication work of European labour inspectorates but often, we can’t afford the time or resources to start from scratch in each case.

Flexibility can be achieved in joint communication material despite the countries having different competences and legislations on the subject. When country specific versions are produced, they can allow for nuances that stem from legislation, competences, and communication priorities. It must be respected that country specific priorities can vary and don’t always align. All involved in devising a campaign must therefore be candid about their domestic priorities as soon as they emerge and where the hard limits lie. This is a key element in a successful final product. If all involved are not upfront about availability, prioritises and competences, it risks that the material doesn’t meet its goal or is even considered a failure.

Cross border collaboration in communication should be made a realistic option - not only a luxury. The more often collaboration takes place on an expert level the more effective and effortless the collaboration becomes. This has immense impact on the outcome of the work improving both the quality and cost effectiveness of the collaboration. Labour inspectorates should be open to the possibility to collaborate with one or more countries on different matters. Exposing communication experts to cross border collaboration with their peers also has positive

impact on internal communication work. However, it must be kept in mind that for such optimal outcome an expert must be given room to provide expertise without it adding to an already full schedule of competing tasks. This calls on a top-down recognition on the importance of communication in preventing further unhealthy competition and undeclared work. Knowledge and prevention cannot be achieved unless both time and resources are provided to the communicators tasked with this goal. This also means to allow for continuity of those involved in undeclared work allowing them to grow as experts. Preserving this knowledge and its overlap within our own authorities is essential for these experts and rotating communicators must be avoided without being mindful of the possible negative effect since hands on experience is vital.

The initial steps of all collaboration require some legwork such as analysis of data and legislation of those involved. Going forward this work should decrease with added knowledge of the experts involved but that can only be done if the authorities allow for continuation and preserve the acquired knowledge.

As previously stated, one of the most promising outcomes from the previous project was that despite different legislations and approaches, there are several commonalities to be found between the participating countries. The opportunities are not only in joint production of communication material but in mutual learning and establishing a network of communication experts where the countries involved could share developments, knowledge and seek guidance from their peers. This remains to be one of the most significant factors from the second round of the project – that the participating countries could enhance each other's work and create synergy in their work against undeclared work - domestically and across borders.

Outputs:

Two communication campaigns were carried out by the working group for communications. The first during January 2021. The participating authorities were the Icelandic Directorate of Labour, The Swedish Work Environment Authority and the Finnish Occupational Safety and Health Administration. The combined impressions of the three countries on all platforms were 796.000 views. The platforms used were LinkedIn, Facebook, Instagram, Twitter and YouTube. Target audiences and ad-sets may be found in Annex I.

The Icelandic version of the film can be accessed here: https://youtu.be/uf_uHO9Szoc

The Finnish version of the film can be accessed here: <https://fb.watch/5ity3fxO1H/>

The second communication campaign was the distribution of the Finnish version of the kit film adapted by the working group. The film was distributed for comparison purposes by the Finnish Occupational Safety and Health Administration and reached 51.044 individuals and number of impressions was 137.735. The channels used for distribution were LinkedIn, Facebook, Instagram and Twitter. Details on the campaign may be found in Annex I.

The Norwegian version of the kit film may be found here: <https://fb.watch/5itCbH-fjK/>

The Finnish version of the kit film may be found here:

<https://twitter.com/tervettatyota/status/1376422427580895233>

Annexes

Annex I. Compilation of data from communication campaigns.

Annex II. Sample of stills from film on equal treatment of posted workers.

Annex III. Communication handbook