

UDW COMMUNICATION HANDBOOK



CONTENTS

UDW Communication handbook	4
General	4
Country profiles	7
Denmark.....	7
Estonia.....	9
Finland	14
Iceland.....	18
Norway	20
Sweden.....	23

UDW COMMUNICATION HANDBOOK

General

Purpose of the handbook

The Nordic and Baltic countries are very committed to the task of tackling undeclared work (UDW). We are of the opinion that it is crucial to establish good collaboration between ourselves due to geographical proximity and many socio-economic and labour market similarities. Within the Nordic-Baltic Undeclared Work Projects, we have acknowledged that we share many of the challenges that can be identified on the European labour market today. To facilitate the transition from undeclared work to declared work is one of the most important goals for us all. From the beginning of the project, communication has been identified as one of the key elements for preventing and counteracting undeclared work. Communication is also a field where there are opportunities for collaboration and knowledge sharing. We acknowledge that the participating authorities have different priorities, responsibilities, competences, and resources. However, we do not see this as an obstacle but a chance to learn from each other and share practical experiences.

The purpose of this handbook is to provide examples on how authorities can communicate to combat undeclared work by building on the outcome and challenges identified throughout Nordic Baltic Undeclared Work Project that concluded its work in 2021. The second half of the handbook provides country specific information on communication such as preferred methods and good examples. This handbook is primarily intended for individuals who work within communication in the participating authorities or those who wish to incorporate communication into their work to combat undeclared work (UDW).

Background

During the first project¹, the Nordic Undeclared Work Project (NUDWP), a working group for communication was established to explore the possibilities of producing material, common issues and target groups, as well as identifying the need for collaboration and knowledge sharing. The group met twice during the project and produced a film with a common target group, highlighting the rights of posted workers in the Nordic countries. A country specific version was produced for each of the participating countries. The countries involved were Finland, Iceland, Sweden, and Norway.

The second project, from 2018 to 2021, the Nordic Baltic Undeclared Work Project (NBUDWP), focused on carrying on where the

previous project ended, collaborating further on communication material, strengthening cross border dialogue and dissemination of communication material, knowledge, and experiences. The countries involved were Estonia, Finland, Denmark, Iceland, Latvia, Sweden, and Norway. During these two years the working group engaged in a mutual knowledge exchange of communication strategies, material, and good practices. This is one of the most promising outcomes of the project.

Outcome of the NBUDWP

During the second project, the working group produced a film – aimed at companies using posted workers, so called recipients of services. The overall message of the film is that posted workers should, for the most part, have the same rights as the company's own employees. Beyond highlighting the legal consequences, the aim of the film was to connect with the viewer and evoke emotional response, as business owners shouldn't only account for legislation but also social responsibility and ethical business practices.

A joint campaign was carried out involving the film where three countries committed to a two-week distribution of the film on social media with a fixed target group for the duration. The countries involved were Finland, Iceland and Sweden. The distribution cost was funded by the NBUDWP. Given that the composition of the target groups varied domestically, and the ad-sets were not identical for the participating countries, the aim was to reach the intended target group, business owners and managers of companies using posted workers. It must also be kept in mind that the legal framework on posting of workers are different in the participating countries. When reaching a narrow target group like a specific group of business owners, identical ad-sets may not be feasible in this type of collaboration. Reaching the target group in each country should be a priority rather than fixed, fully comparable ad-sets when it comes to UDW communication¹.

The joint campaign was carried out for measuring purposes which had not been done before both in terms of reach and if the campaign resonated with viewers in different markets. This has provided some indicators for future collaborations as well as increasing mutual knowledge.

The Covid-19 pandemic had a significant effect on the scheduling and participation in the campaign. Initially all seven countries intended to participate. The campaign was successful as a first joint venture for a Nordic-Baltic communication collaboration. Even though it was carried out in an unresponsive market, due to border closures and economic downturns. The campaign addressed the rights of posted

¹ Further information may be found in the final report of the Nordic Baltic Undeclared Work Project issued in June 2021

workers in the participating countries where the social dialogue and awareness has prioritized Covid-19 related matters during this time. The campaign therefore filled a communication void for raising awareness that would otherwise not have been met, including the right of posted workers to adequate safety equipment and healthy work environment. It can also be expected that the response to the campaign would have been even better had its distribution not collided with the pandemic. It is also hoped that the messages will resonate with employers when the labour market regains its footing.

The working group also adapted communication material from Norway for use by other countries targeting undeclared work, highlighting the fact that often there is excellent material and examples already in place that can possibly be distributed or adapted. All participating countries were given the chance of adapting the material to their own market by submitting country specific versions of subtitles. The production costs were funded by the project. The countries were given free rein on what the message of this film was, providing that it fit within the realm of undeclared work. For measurement purposes, Finland was provided with funding to perform sponsored distribution of their version for a two-week period in April 2021. The outcome was that the film was very adaptable to a new market and the campaign met its goal.

Challenges and lessons learned.

The NBUDWP was the first time the participating authorities have collaborated in communication for this length of time, from 2017 to 2021. During this period, the largest hindrance was the Covid-19 pandemic. All countries have had to adapt and pivot their priorities towards Covid-related communication within short notice. Effort and time had to be reprioritized from traditional work, including the project, to engage in time sensitive and urgent communication on the Covid-19 related work of our authorities. This pushed for the combination of remote collaboration and online meetings that would not have been preferred before but is now a possibility of more frequent contact in between physically meeting face-to-face. There are undeniable advantages to online meetings, but they cannot replace physical meetings when creative collaboration or in-depth work needs to take place.

The following challenges need to be accounted for in future cross border collaboration:

Legislation and mandates are different in each country and for each authority. This makes it hard to find a common target group and set common communication objectives. It can slow down the work process and increase the labour involved to make joint communication actions that will have the desired effect on the target group. The initial steps of such collaborations therefore require analyses of data and legislation of the countries involved. When performing joint communication actions, it is important to define the boundary conditions and the mutual goal in the beginning before

any other actions are taken. The goal, metrics and conditions should also be revisited regularly. This is important since the mandates and legislation differ in each country and authority.

When choosing a topic, target group and a common message it must be noted that country specific priorities do not always align with other participating countries. 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 to reach the communications goals and wanted effects. If the collaborators are not forthright about availability, prioritises and competences, it runs the risk of the material not meeting its goal or is even considered a failure.

On that note, it is necessary to outline the common goal and parameters of a campaign in the very beginning and what can be considered a success. It is also necessary to determine what values and metrics should be fixed if the aim is to gain comparable data from a campaign. Data availability is not always similar or readily available between countries. It's hard to plan communications when there is scarce knowledge of the matter or concrete data. This can range from comparable information and data availability on common industries and target groups that are necessary prior to agreeing on selection, message and direction. Market studies and target group analysis are other tools that should be available when mounting targeted joint campaigns on larger scale. This is also why analytical experts and/or data experts should be involved in the initial stages of devising a communication strategy and campaign in a cross-border capacity. Such experts are in most cases more adept in combining and identifying the necessary commonalities than the communication experts that build on that data.

Launching new material is costly and time consuming but often necessary. When establishing a workplan for a new campaign it must be considered that devising new material and launching a campaign takes twice the time it would take to do domestically, as there are more meetings required on all stages as well as the timeline must align to all participating countries and competing schedules.

Adapting existing material to fit a joint campaign or collaboration is a good alternative way to carry out a joint message or to contribute to a larger joint campaign. Considering the many common attributes of the Nordic-Baltic labour markets this should be encouraged.

Flexibility can be achieved in country specific versions of material as they can allow for nuances that stem from legislation, competences, and communication priorities. This makes it easier to settle on a single visual material with the possibility of adapting the final product during post-production.

For optimal outcome of a project, the experts involved need to be given room to provide expertise without it adding to an already full schedule of competing tasks. Knowledge and prevention cannot be adequately achieved unless both time and resources are provided to the communicators.

Possibilities for future cooperation and discussions

One of the positive outcomes from the second project has been the strengthened collaboration between communication experts and the dynamic exchange of ideas with responsive engagement from the whole group. The project managed to create a possibility for a lasting expert group for UDW communication between the Nordic-Baltic countries. There is great added value for the participating countries to facilitate the ongoing network of communication experts. The future aim should be on a long-term network focusing on mutual knowledge with the added possibility of joint campaigns of two or more countries as well as providing insight and assistance if necessary. European labour markets continue to become more fluid each year with new challenges emerging. Our communication and prevention methods must therefore be as adaptable.

Future collaboration should be done by combining both web meetings and physical meetings. Online meetings would be financially feasible whilst allowing the incorporation of new communication experts depending on the subject at hand and disseminating further the worth of cross-border collaboration. This could also allow for more diverse expert incorporation such as analytical or legal experts when exploring new joint ventures or common target groups. This possibility could even be extended to inspectors or enforcement specialists, particularly in instances where they play a role in planning communication for joint ventures. This would and should correlate directly with other cross-border collaboration taking place between the Nordic-Baltic countries regarding UDW.

During the two projects the working group did not address the possibility of serving the project itself via communication methods. A possibility for future cross-border work would be to incorporate communication experts to communicate the internal work by supporting other working streams within the project and the work done within the project. The group could provide support to specific webinars, conferences and ad hoc inspection initiatives by disseminating outcomes. The group could also be involved in propelling work from the project as a whole and assisting in effectively presenting the project. The communication group could also be involved in strategically disseminating future and existing material, internally or externally.

In instances where collaboration on joint communication material and/or campaign is requested of communication experts it should allow for the adaptation of existing communication material, which is often highly relevant for the participating countries, more time-effective, less costly and has already been tested in an existing market



COUNTRY PROFILES

Denmark

Key figures for Denmark

Of the Danish population of 5.4 million, the labour force, i.e. employed and unemployed, in 2019 approx. 2.8 million. Of the other 2.6 mill. Danes are almost half children and students without employment, and approx. 40 percent are pensioners and early retirement recipients. The last 10 percent includes i.e. persons who are temporarily out of the labour force, home-working spouses and recipients of assistance unrelated to the labour market. For the working group of the working age population, the labour force is 80 per cent. This employment rate is among the highest in the world, which is due to the very high employment participation among women in Denmark. Women's occupational participation in this age group is thus 77 per cent (2004), which is only surpassed in Iceland.

The Danish workforce has 2.8 million employees spread across approximately 200,000 enterprises (approximately 310,000 if the self-employed are included, there are 187,000 self-employed persons).

The Danish labour market is characterized by a long tradition of determining wage and working conditions via collective agreements and persistently high collective agreement coverage. Unlike most other European countries, there is virtually no legislation on matters such as pay, working hours and termination of employment.

The Danish labour market is internationally known for its 'flexicurity model'. A mix of the terms 'flexibility' and 'security', this concept refers to a welfare state model that combines a flexible labour market with social security for all workers. Most labour market issues are settled by employers and employees rather than by law. Employees choose a union representative who undertakes local negotiations on wages and other work conditions with the employer. In many workplaces, professional organisations play an active role and approximately six out of ten employees are members of a trade union.

The authorities that carry out inspections in Iceland are the following:

Authority		Role in UDW capacity.
Arbejdstilsynet Working Environment Authority, WEA)	https://at.dk/en and https://workplacedenmark.dk/	Occupational Safety and Health. WEA contributes to the creation of safe and healthy working conditions at Danish workplaces. This is done by: Carrying out inspections at companies Drawing up rules on health and safety at work Providing information on health and safety at work.
Skattestyrelsen (Tax agency)	https://www.sktst.dk/english/	Responsible for enforcing correct taxation and registration of income.
Politiet (police)	https://www.vinnueftirlit.is/english	Support to other authorities as well as specific competences regarding foreign labour.
Styrelsen for international rekruttering og integration (Agency for International Recruitment and Integration)	https://www.nyidanmark.dk/en-GB/ContactUs/Contact%20SIRI	Is responsible for processing applications for residence permits for third-country nationals, i.e. citizens of a country outside the Nordic region and the EU/EEA who must have a residence permit to reside in Denmark.

Preferred communication methods

WEA's communication efforts are based on a combination of push and pull communication as well as digital tools to support work environment work direct. The push page covers proactive communication to companies via newsletters, social media, 1-1 communication via letters. Pull communication consists of websites (www.at.dk; www.workplacedenmark.dk).

The digital tools include a digital APV (workplace risk assessment) tool and a lifting app.

In recent years, WEA has worked to develop all three parts.

- A far more user-centered website has been developed, proactive communication campaigns have been developed and implemented, especially aimed at smaller companies, which have developed industry-segmented newsletters - and the Danish Working Environment Authority's use of social media, including Facebook and LinkedIn, has been developed and optimized. Finally, a completely new use of letters for companies has been developed.
- An industry specific APV tool has also been developed and guides the user through the entire APV process. The tool shows the problems typically found in the industry, supports users in dealing with problems, and comply with applicable rules.
- As something new, WEA has established a small behavioural unit that performs experiments that must contribute knowledge to how WEA best supports companies in improving their working environment - here, among other things, various forms of action-supporting communication are tested, primarily via 1-1 communication (letters).

In the years 2020-2023, WEA will work based on the following six strategic guidelines:

- The communication in WEA's channels must ensure that the authority-imposed work with the working environment is always made as frictionless as possible for the companies. As a tool, the communication must not only be used to inform about requirements, but also actively support the users in living up to this in practice.
- WEA's communication must be differentiated across channels and be action-oriented and adapted to the target group's competencies and needs. Regardless of channel, the individual user must always be met by communication that matches the person's competence level and helps him / her to further translate knowledge, requirements, etc. in practice.
- In order to reach a broader group of companies, WEA must develop targeted push channels and formats that reach and speak to that target group.
- WEA must develop new and existing 1-1 channels in order to expand the relationship with the companies. 1-1 channels must ensure that the part of the target group in particular, which has less knowledge of work environment work, always has an experience that there is access to dialogue and easy-to-understand help.
- WEA should always appear as a clear and service-oriented actor in communication - and it must always be made clear to users what are the requirements of the authority and what is the inspiration for action.
- WEA must set and influence agendas in the press and on social media to strengthen the brand as a helper and facilitator of a good working environment.
- Strengths in communication (and challenges)
 - » Examples, for example successes or failures
 - » This can include OSH if the country finds it relevant
 - » UDW specific communication
 - » <https://workplacedenmark.dk/other-languages/information-overview/>
 - » Posting – specific communication is also relevant here <https://workplacedenmark.dk/other-languages/information-overview/>

Involvement in the EU4FairWork campaign

On behalf of Denmark, WEA and the Danish Tax Agency have participated in the joint European campaign EU4FairWork. The purpose was to focus on the efforts against social dumping and to spread knowledge of rules and rights in the Danish labour market.

As part of the campaign, WEA and the Danish Tax Agency have carried out 42 activities. The activities included joint government actions against social dumping, news for the website and 23 posts on social media, which have achieved a total of 136,654 views and 1,421 reactions (likes, etc.).

The primary target group for the campaign was Danish companies with foreign labour as well as foreign companies and workers working in Denmark.

The advertisements dealt with work in the industries that are most affected in relation to social dumping. Among other things, construction, agriculture, transport, tourism, cleaning and hotel, restaurant and catering/food services.

Estonia

Key figures of Estonian labour market

The Estonian state is characterized by simplicity and speed of administration, where there are many e-services that also support entering the labour market. In recent years, the Estonian labour market has been characterized by a high employment rate, including among the elderly, a low unemployment rate and low labour productivity, rising wage pressures and labour shortages. The coronary crisis may now affect all this.

Population of Estonia in the beginning of 2021 is 1 329 460 (as of 01.01.2021). The population of Estonia has grown since 2015 - the reason is foreign migration. Along with the rise in population, the number of people of working age (15-74) has increased, also because by the positive migration. According to Statistics Estonia, in 2020 the labour force participation rate was 71.6%, the employment rate was 66.7% (656 600 people employed last year, 568 200 of the employed worked full-time and 88 300 part-time) and the unemployment rate was 6.8% (47 900 unemployed in 2020).

The number of companies with at least one contract employee is growing every year. In the Estonian work environment, micro-enterprises, ie e. companies with up to ten employees, which make up about 87% of the total business environment, and the number of such small companies also increased during 2020. Estonia has the largest number of micro-enterprises, while these few large enterprises still have the most employees. 56% of Estonian employees work in large Estonian companies.



In terms of areas of activity, Estonia has the largest number of operating companies in the trade sector, construction and professional and scientific activities. The number of contract employees is also the largest in trade sector, in public administration and in the health care sector. According to Statistics Estonia, 18% of the employed work in the manufacturing sector, the largest industry in Estonia is the metal products sector.

The Labour Inspectorate of Estonia (LI) supervises companies where at least one employee has an employment contract or are members of the management board who act as employees. Companies where the relations between employees and the employer are regulated on the basis of the Law of Obligations Act (LOA) are not directly under LI supervision. At the same time, after a complaint or a hint, it may be possible to get there, and if it turns out that the employees still work in the same way as contract employees, our lawyers can re-evaluate the (LOA) contracts and make comments about the entire work environment.

In Estonia, employment relations are regulated by the Employment Contracts Act (ECA). The purpose of the Act is to regulate the relations between employers and employees, ensuring that based on the principle of a welfare state all employees have sufficient security, allowing undertakings realisation of their constitutional right to conduct a business and contributing to the growth of the competitiveness of Estonian economy.

When coming from abroad, it is possible to work in Estonia in many ways. The third-country national must be registered with the police, posted as an employee in the labour inspectorate or in the register of employment as an employee of an Estonian company. Proper registration also eliminates the risk of labour exploitation and possible human trafficking, as it is the undeclared and / or illegal worker who is significantly more at risk of being exploited or trafficked. The employer is primarily responsible for the correctness of the entries in the Employment Register (TÖR), because according to the Taxation Act, it is his / her obligation to make an entry in the employment register. . An entry in the employment register creates several important rights for a person, including the right to health insurance, the right to parental benefit, as well as the right to register as unemployed and apply for unemployment benefits.

Relevant authorities

Authority	Website	Role in UDW capacity
The Labour Inspectorate of Estonia	https://www.ti.ee/en	The liaison office for employees is the Labour Inspectorate. The Labour Inspectorate performs state supervision of the conditions of employment of posted workers in Estonia and responds to reasoned requests for information about laws, other legal acts, and extended collective agreements that apply to posted workers. In addition, the Labour Inspectorate manages the exchange of information with other EU member states. The Labour Inspectorate provides free counselling services to both employees and employers. If you have any questions regarding the registration of employees posted to Estonia or the working conditions of employees posted to Estonia, you can contact a counselling lawyer or work environment consultant of the Labour Inspectorate. The counselling lawyer answers questions related to employment relations, the work environment consultant answers questions related to work environment safety and occupational health.
National Social Insurance Board	https://www.sotsiaalkindlustusamet.ee/en/social-security-european-union	Social insurance matters
Estonian Health Insurance Fund	https://www.haigekassa.ee/en	Health insurance
Estonian Tax and Customs Board	https://www.emta.ee/eng	Taxation
Police and Border Guard Board	https://www.politsei.ee/en	Migration matters
Integration Foundation	https://www.integratsioon.ee/en/counselling-web	Counselling, information about integration, and immersion courses on language and culture.
Estonian Refugee Council	https://www.pagulasabi.ee/en	Support services to beneficiaries of international protection.
Innove Foundation	https://www.innove.ee/en/	Counselling for language studies, preparation for citizenship examinations, and educational staff;
Estonian Unemployment Insurance Fund	https://www.tootukassa.ee/eng/content/services	Counselling on first-time employment in Estonia, counselling for unemployed and employed persons, debt, addiction and experience counselling.

UDW elements

Labour Inspectorate of Estonia inspects undeclared and illegally working persons in cooperation with the Police and Border Guard Board and the Tax and Customs Board. Citizens of third countries must be registered with the police, in the case of working as a posted employee with the Labour Inspectorate, or, as an employee of an Estonian company in the employment register.

The percentage of foreign workers has significantly increased in Estonia in the last few years (NB! situation before corona crises) and workers from third countries can be seen on almost every other construction site. Foreign workers are also increasingly reaching other sectors.

The problems experienced mostly concern the workers in Estonia from Ukraine, Belarus, Uzbekistan, Georgia, and Moldova. Companies are increasingly more often developing schemes for bringing foreign workers to EU countries and circumventing the

requirements required by law. For example, employees are hired by Polish companies and dispatched to Estonia but the employees have never worked for the Polish companies and in the best case, only know the name of the company with whom they signed their employment contracts. This scheme brings cheap labour to Estonia, as in the case of posted workers, it is only required to observe the minimum wages established by the Government of the Republic in the payment of wages. This scheme may also be used with the aim of circumventing the payment of taxes, while juggling between the legislation of two different countries. This is a priority for the supervision authorities conducting joint controls, as it is also related to issues, such as employment-related exploitation and potential human trafficking. Undeclared and/or illegal employees are at a significantly higher risk of becoming victims of employment-related exploitation or human trafficking. Illegal work is also accompanied by various different tax violations, gives rise to unequal competition between companies, and provides an opportunity for exploitation of the employees, as almost no social guarantees which all employees working in the EU must

have are ensured to these workers during employment in Estonia. Joint controls have also resulted in an increase in the information exchange and cooperation between supervision authorities, which makes the supervision related to foreign workers more efficient.

GIG elements

The so-called “gig economy” is attracting an increasing number of people -- in Estonia 8% of people regularly work via online platforms, it appears from a survey conducted in 2018. Online platforms for work mediation have spread quickly in Estonia -- ride sharing and delivery services have firmly planted themselves here; however, work is also mediated via platforms in translation and design services, childcare and housework. The so-called “gig economy” is generally not the main source of income for residents of Estonia, altogether 8 percent still work via a platform at least once a week and 20 percent of the working age population have undertaken platform work at least once. The most popular work platforms in Estonia are Bolt, Uber, Wolt and GoWorkaBit. Platform work is the only source of income for 4% of platform workers, while 24% of them earn half of their income or more in this way. 76% earn up to a half of their income through platform work. Close to a half, or 49% of Estonian platform workers said that they have a full-time job while 7% work part time. 9% of platform workers in Estonia are self-employed, 3% are retired and 15% are students.

Preferred communication methods

In Estonia the occupational safety, work environment and relations, rental and posted worker, resolving disputes in the Labour Dispute Committees communication is coordinated by the Labour Inspectorate of Estonia. Labour inspectorate prefers always to use direct communication, but common is also informing society.

Estonian Labour Inspectorate (LI) has several ways to inform different target groups in labour market:

- Webpages: actual and necessary information is available in three languages (Estonian, English and Russian) on the labour inspectorate homepage <https://www.ti.ee/en> and on the Work Life portal <https://toolu.ee/en/homepage>
- LI homepage is more for formal information and forms. Work Life portal includes more guidance, presentations, news, events, videos, publications etc. On LI homepage can find also links to other countries webpages (Going from Estonia to work abroad)
- Social media (LI Estonian <https://www.facebook.com/Too-inspektsioon> and Russian Facebook <https://www.facebook.com/InspekciyaTruda>, Work Life portal Facebook <https://www.facebook.com/toolu.ee>) This is the best and most effective way to disseminate news, information, guidance, advice in Estonia

- Publications and their free dissemination in different events or offices <https://www.ti.ee/en/media-and-publications/publications-labour-inspectorate>
- Work Life magazine on paper and electronically (only magazine which writes about working life) <https://www.ti.ee/et/teavistus-tegevus-infomaterjalid/ajakiri-toolu>
- The information letter for beginning companies: LI sends information letters for beginning companies to help those who have just founded a new company understand the importance of working environment management, to help them create safe and healthy work conditions and form proper employment relationships. The information letter is e-mailed to newly registered companies once in a quarter in Estonian, Russian, and English.
- Events, actions: practical seminars, conferences on actual topics and cases, on the web and in space <https://www.ti.ee/et/teavistus-tegevus-infomaterjalid/teavitusuritused>
- Campaigns: campaigns on topics, which need further clarification or introduction <https://www.ti.ee/en/communication-activity-and-media-publications/ongoing-campaigns>
- Statistic: Compilation and distribution of Estonian work environment statistics in the media and LI homepage <https://www.ti.ee/en/statistics-est/annual-reports-work-environment>
- Cooperation with partners: joint events and controls with social partners
- Articles and press releases and direct communication with media
- The working environment self-service of the Labour Inspectorate: The working environment self-service of the Labour Inspectorate helps you improve the working environment of your company and to communicate with the labour inspector quickly, conveniently, and paperlessly <https://iseteenindus.ti.ee/login?lang=en>
- Statistic: Compilation and distribution of Estonian work environment statistics in the media and LI homepage <https://www.ti.ee/en/statistics-est/annual-reports-work-environment>
- Cooperation with partners: joint events and controls with social partners

Estonian Labour Inspectorate most popular service is free counselling service (calling the hotline 640 6000, receptions, asking for advice in writing – Skype, Facebook, e-mail). The legal advisors give answers to questions concerning employment contracts, working and rest time, holidays, wages and other matters related to labour relations as well as collective labour relations. The work environment consultants answer

questions about safety at work and healthy workplaces. The goal of the counselling service is to help all parties of a working relation to know and fulfil all their contractual and agrees rights and obligations, to promote lawful actions and to reduce and prevent conflicts and violations. Counsellors also provide lectures on the web and is space free of charge.

Strengths in communication

The strengts in the occupational safety and health communication is cooperation and integration. If something is relevant or changing, then it is necessary that the information changes or is published in different channels and at the same time, because different target groups consume different channels. The information must always be up-to-date and correct, otherwise consumer confidence will be lost and it will be very difficult to restore it. Information must be conveyed easily and clearly, because the knowledge and experience of the target groups are different, and this also makes the reception and understanding of information different. The chancellery should be avoided. the information must be easy to find, then people will come back there to look for information again. Information heard from a popular or influential person in society and information gained through a positive experience is always better disseminated. Together with partners always achieves a greater voice.

Examples of successes

Free counselling service of the Labour Inspectorate

2020, the year of the virus crisis, led to a multiplication of calls to and calls from the helpline. For the first time, § 37 of the Employment Contracts Act, which deals with the reduction of wages in the event of non-employment, was introduced so widely. In 2020, employment relationship-related advice was given to employees and employers on 57 688 occasions, which was, in summary, almost a third higher than in 2019. The whole time of the emergency and the confusing year brought record numbers of questions to our advisers. The number of calls to the information telephone increased by 43% and the number of e-mails increased by 41%. The number of appointments has dropped significantly but counselling via telephone, Skype or Facebook or by e-mail has intensified. The counselling service of the LI is popular and necessary and highly valued by the clients. The satisfaction survey proves that the clients have mostly been very satisfied with the service.

COVID-19 guides for workplaces

In 2020 Estonian Labour Inspctorate disseminated necessary information (mainly social media and Work Life portal <https://www.tooelu.ee/en>) and composed guides about workplace safety, labour relations etc. Work Life portal was during the corona crise the main landing page for labour relations information, workplace

safety etc. It was pointed out that the information was clear, accessible and searchable in one place, and it was acknowledged by various government agencies and companies.

Know your Rights campaign

Years ago, the Labour Inspectorate organized an information campaign "Know your rights - a posted worker". The aim of the campaign was to raise awareness of the posted worker among employees and employers. The target group of the campaign was employees and employers who are exposed to working abroad or purchase labour services from EU member states to Estonia. The distinction between a posting and a posted worker is difficult for both the employer and the employee. It is difficult for a person applying to the labour inspectorate to understand which law applies. The terminology is also confusing - whether it is a posting or a posted worker. As part of the campaign, a seminar was held on board of the ship to the main target group – posted workers (Estonia-Finland), 15 information days in various Estonian cities, a press conference, a media campaign, substantive articles and a brochure "Business trips and posting of employees" were published.

UDW specific communication

A good employment relationship starts with negotiating a contract and concluding a contract. In Estonia, the employer must also make an entry in the employment register. All these activities are important in order to protect the rights of both parties - the employer would know that he has a person who will perform the necessary tasks. The employee knows that he or she will be paid for the work and, if necessary, a social safety net will be opened - be it parental benefit, future pension or support for the time when he or she should lose his or her job.

Nevertheless, non-declaration of work and envelope pay remain a significant problem. The same problem is present throughout Europe. This launched the pan-European campaign # EU4FairWork, which in 202 raised the profile of illegal employment in European countries. Although not working properly is also a problem among local workers, especially young people, this time foreign workers were particularly under scrutiny.

In Estonia, undeclared employment activities are carried out by the Labour Inspectorate in co-operation with the Tax and Customs Board and the Police and Border Guard Board. information work is carried out and joint tours are organized throughout the year, regardless of the campaigns. This practice has been used by the above-mentioned agencies for years - by conducting joint raids, the situation can be resolved immediately in the view of all three agencies, in terms of illegal employment, undeclared work, shortcomings in employment relations and occupational safety. Our goal is for foreign employees to work legally and to fulfill the rights and obligations of the parties arising from the employment contract and the legislation of the

Republic of Estonia. It is in the interests of each country and its people to have people who have a legal basis to do so and who carry out their responsibilities in the same way as all permanent residents.

When coming from abroad, it is possible to work in Estonia in many ways. The third-country national must be registered with the police, posted as an employee in the labour inspectorate or in the register of employment as an employee of an Estonian company. Proper registration also eliminates the risk of labour exploitation and possible human trafficking, as it is the undeclared and / or illegal worker who is significantly more at risk of being exploited or trafficked. Illegal employment is also accompanied by various tax violations, unequal competition between companies, employees may be exploited, ie these people are not guaranteed the social guarantees that all employees working in the European Union must have while working in Estonia.

The employer is primarily responsible for the correctness of the entries in the Employment Register (TÖR), because according to the Taxation Act it is his / her obligation to make an entry in the employment register. The entry in the employment register creates several important rights for a person, including the right to health insurance, the right to parental benefit, as well as the right to register as unemployed and apply for unemployment benefits.

Involvement in the #EU4FairWork campaign

Last March, the European Platform against Undeclared Work #EU4FairWork was launched, focusing on prioritizing declared work. The aim of the campaign was to raise employees' awareness of their rights, the negative impact of undeclared work and the possibilities of transitioning to declared work, to inform companies about the benefits and obligations of declaring employees and the risk of sanctions in case of undeclared work. In mid-September, seven joint inspections were carried out during the week, each covering several sites. Was made an landing page for the campaign on Labour Inspectorate homepage <https://www.ti.ee/et/valismaine-tootaja/kampaaniad/deklareerimata-too> Social media posts in Labour Inspectorate and Work Life portal Facebook were disseminated. Shared European platform #EU4FairWork guides and some were written by themselves. And this was all done together with Tax and Customs Board and the Police and Border Guard Board.

The Norwegian Labour Inspection Authority “Know your rights” campaign

Under the auspices of the Norwegian Labour Inspectorate Authority and in co-operation with the Lithuanian, Latvian, Bulgarian, Polish and Romanian Labour Inspectorates, the Know Your Rights information campaign was completed, explaining that workers from other countries have the same rights as Norwegian colleagues. In Estonia Labour Inspectorate made social media posts in LI and Work Life portal Facebook, made an landing page in LI homepage and shared information for social partners. The campaign on our website <https://www.ti.ee/en/valismaine-tootaja/kampaaniad/norra-tooinspektsioon-kampaania-tunne-oma-oigusi>



Finland

Key figures for Finland

Population of Finland is 5 525 292 of which the working-age population (aged 15-64) is 3 422 982 (situation 1.1.2020). Rate of employment according to Statistics Finland 's Labour Force Survey (November 2020) is 72,2 % and the unemployment rate is 8,1 %. Unemployment rate in Finland follows the development of Euro area unemployment rate which is 8,3 % and is a bit higher than the EU-28 average which is 7,5 %. (September 2020).

Finnish law does not specify a minimum wage. This means that also posted workers must be paid at least the wages specified in the relevant generally binding collective agreement. In general, wages are paid per hour, per month or by the piece. In Finland there are roughly 160 generally binding collective agreements in different sectors.

UDW elements

The use of undeclared workers is an international phenomenon involving both domestic and international operators. In Finland, the risk of the abuse of workers increases in step with an increase in foreign employees. In the most serious cases, the use of undeclared workers may involve extortionate work discrimination, forced labour and trafficking in human beings when the work is carried out in unlawful conditions.

Foreign labour has arrived in Finland particularly from the Baltic countries, but increasingly also from Ukraine and other countries that were a part of the former Soviet Union. The cleaning and restaurant sectors have large numbers of foreign born entrepreneurs who employ citizens of their country of origin. These employees often lack language skills and are unfamiliar with legislation or their own rights. The employer and employee may have an understanding that the terms and conditions applied to wages and the employment relationship are agreed upon in line with the practices of their country of origin, despite Finnish legislation.

Based on the observations of several authorities, the amount of undeclared work in Finland has been on the rise over the past two years. The increase is indicated in, for instance, increased contacting of industrial safety authorities and the inspection observations collected by authorities at construction sites. More people without a right to work have also been met during inspections than before. So far, there is no reliable overall estimate of the scope of undeclared work or the damage it causes to society. Undeclared workers aim to operate beyond the reach of authorities and only a part of it is uncovered through the measures of authorities.

GIG elements

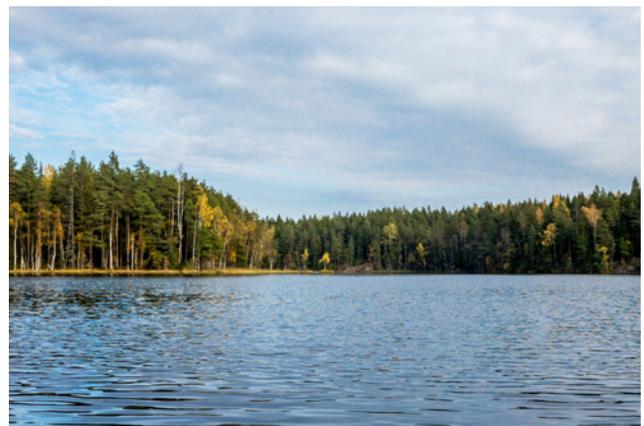
New ways of working are growing at an increasing rate and, at the same time, there are now more different platform solutions available on the market. Digital platforms are provided by both Finnish and foreign operators.

A typical "light entrepreneur" using the services of an invoicing company is a self-employed person who offers a service, such as cleaning, transport or construction, via a digital platform. They are not listed in the prepayment register and do not have their own trade name. Usually, their remuneration is based on the amount of work the person has carried out, and does not require expensive investments in devices. This kind of work can also be a person's secondary work or a risk-free opportunity to test out a new business idea.

In the platform economy of the future, work will become fragmented into small units, and, in its current scope, no statistical information is available on the phenomenon. Based on the number of customers registered with the biggest companies providing invoicing services, there are already estimated to be several tens of thousands of "light entrepreneurs" in Finland.

People who otherwise have a weak position in the labour market can also be forced into entrepreneurship against their will. Foreign workers and asylum seekers can be hired for various tasks with entrepreneur status, which means that the responsibility for handling the employer's obligations is transferred artificially to the employee. Compensation for work can be less than the minimum wage as set in the collective agreement, and, in the worst-case scenario, the practices can fit the description of employment discrimination in the form of extortion, for example.

New ways of working create challenges for the authorities when it comes to interpreting whether work is being carried out by an employee or an entrepreneur according to the current legislation. In individual cases, the line is not always clear. In some situations, authorities have different interpretations of a person's legal position. That said, authorities also collaborate when investigating individual cases related to the status of employers.



Relevant authorities

Authority	Website	Role in UDW capacity
Tax Administration Verohallinto	https://www.vero.fi/en/	Responsible for enforcing correct taxation and registration of income.
Finnish Centre for Pensions Eäketurvakeskus	https://www.etk.fi/en/	Central body of and expert on statutory earnings-related pensions
OSH Administration / Regional Labour Inspectorates Työsuojeluviranomainen	https://www.tyosuojelu.fi/web/en/home	Occupational Safety and Health Carries out inspections related OSH and Labour Law matters as well as supervision of The Act on Contractor's Obligations and Liability. Handling of posting declarations
Police Poliisi	https://poliisi.fi/en/frontpage	Support to other authorities as well as specific competences regarding foreign labour.
Finnish Workers' Compensation Center Tapaturmavakuutuskeskus	https://www.tvk.fi/en/	Coordinates and develops the implementation of occupational accident and occupational disease insurance.
Finnish Immigration Service Maahanmuuttovirasto	https://migri.fi/en/home	Decision-making organisation in matters related to immigration, asylum, refugee status and citizenship and maintains the reception system.

Preferred communication methods

In Finland, the cornerstone of the occupational safety and health administration's communication is the website Tyosuojelu.fi, which is published in three languages (FI, SV, EN). The website is linked to the European Union's Your Europe portal. Parts of the service have also been translated into Estonian, Polish, Latvian and Russian as part of the European Labour Authority's evolving activities.

The Tyosuojelu.fi website includes a wide range of services. Its basis is the presentation of occupational safety and health legislation in clear language. In addition, the service includes guides, instructions, publications and forms that can be printed, if necessary. In the future, the online service will also provide access to an e-service, where you can first get help from a chatbot and then, as appropriate, make a request for enforcement related to an employment relationship matter.

As a new service, occupational safety and health communications produce a newsletter four times a year, which is sent to all occupational safety and health managers and representatives in Finland (more than 20,000 people in total).

We actively communicate not only on traditional media, but also on social media, where we are still in the process of seeking our role. We are present on Twitter, where trade unionists, for example, engage in a lively debate on occupational safety and health issues. Facebook

reaches customers interested in occupational safety and health quite well. We have not quite mastered the professional discussion forum LinkedIn yet.

Strengths in communication

In the occupational safety and health administration, the cooperation of communications with enforcement has intensified significantly recently, and at best, communication is an integral part of enforcement. At the same time, enforcement has changed so that, alongside traditional workplace inspections, so-called other means of enforcement have been developed. At best, informative communication paves the way for enforcement and helps the workplace develop its own occupational safety and health work even before the actual enforcement visits.

Active and expert inspectors, lawyers and supervisors must be included in the strengths of the occupational safety and health administration's communication. Among them are numerous enthusiastic communicators who perform naturally, give interviews to the media and participate in the production of communication materials. Many new communication experiments have come about at their initiative. We have been praised by the media for the press releases drawn up by our lawyers on convictions for work offences.

Examples of successes

Telephone Service

The Nationwide Telephone Service of the OSH authorities was established in 2016. Prior to that, advice had been given in different areas in slightly different ways. Advice is available in Finnish, Swedish and English. In biannual evaluation measurements, the telephone service has always received excellent reviews from customers. The telephone service is available in four different topics: employment relationships, the working environment, well-being at work and the construction sector. Most calls deal with employment relationships.

Events

We have organised events for customers (employers' and employees' representatives) and stakeholders both as physical events and online. Among other things, they have provided topical information on legislation and presented enforcement findings. At the events, participants hear how the occupational safety and health authority interprets the law. This has also been illustrated by practical case examples. Events have also been organised together with other authorities.

The events have received excellent feedback from participants. Praise has come in particular for the expert presentations and dialogical touch. At online events, the discussion takes place in a chat room where participants can ask occupational safety and health inspectors for advice. The big events have had between 250 and 950 participants at a time. We also organise small stakeholder meetings where we hear the findings of employers' and employees' representatives regarding working life and their wishes regarding enforcement.

Guidance before inspection

During the weeks of enforcing chemical factors, we increased the guidance aspect of enforcement through communication. In the enforcement weeks, 9–20 September 2019, 400 workplaces were inspected. Prior to the inspection, the workplaces were sent [instructions on the management of chemical risks at the workplace \(also in Swedish\)](#). The instructions included a model example and a form template for preparing a chemicals list and conducting a risk assessment. The inspections revealed that half of the objects of enforcement had used the instructions to improve chemical safety. The instructions were perceived as clear and supportive.

The advance guidance worked well, as most of the workplaces had a desire to put chemical safety in order, but there was little expertise and time for it. The objects of enforcement were small workplaces with fewer than 20 employees. The instructions made it easy for them to take the measures required by law to ensure chemical safety.



Communication was also carried out after the inspections: a compilation of the results of the enforcement week was sent to the workplaces to compare the level of chemical safety with that of other workplaces.

UDW specific communication

The fight against undeclared work requires close cooperation between authorities and organisations, also in communication.

In Finland, the authorities jointly maintain the website [Grey economy & economic crime](#), where information on combatting the grey economy is collected. Its aim is to provide decision-makers with a comprehensive overview of the phenomena of the grey economy and economic crime to support decision-making. In addition, it provides up-to-date information on changes in the operating environment, ways to prevent the grey economy, and the impact of the authorities' measures. The aim of the website is also to improve cross-sectoral cooperation and information flow between authorities. The website also provides businesses and citizens with information on how to act correctly and protect themselves from the disadvantages caused by the grey economy and economic crime.

The phenomena of the grey economy are also made visible by inspection activities carried out by the occupational safety and health authority on construction sites in cooperation with the police and other authorities. The inspections enforce, among other things, workers' tax numbers and right to work in Finland, as well as the list of workers of the work site. The police can issue a fine for negligence immediately on the spot. Press releases on inspection activities often receive media coverage. Cooperation inspections by authorities are also carried out regularly in other sectors, such as restaurants and cleaning sites.

The authorities also jointly organise events for stakeholders and customers. At these events, participants receive answers to questions concerning several different authorities. In autumn 2020, the authorities organised an online information session for construction-sector operators. The webinar was followed by nearly 700 participants.

In Finland, the Act on the Contractor's Obligations and Liability when Work is Contracted Out obliges the contractor to ensure that the contracting partner has fulfilled its legal obligations, such as taxes and pension contributions. This obligation is still poorly known in some sectors, and efforts have been made to raise awareness of the Act in several different ways. Here are some examples:

- regional enforcement campaigns that have been communicated locally
- provision of articles to the media of employers' unions, associations and other stakeholders
- online tests
- info cards in different languages (EN, FI, SE, RU, EE)
- information sessions at fairs and stakeholder events
- Contractor's obligations and liability Twitter account, @tilaajavastuu, where inspectors themselves produce content

The public can provide the occupational safety and health authority with tip-offs on the grey economy **using an online service form**. Through it, we get approximately 300–400 tip-offs a year.

A small information card was made with the National assistance system for victims of trafficking, which is easy to discreetly distribute during inspections to those workers who are potentially at risk of being trafficked.

The European Institute for Crime Prevention and Control, affiliated with the United Nations (HEUNI) published "**Guidelines for businesses and employers for risk management in subcontracting chains**". The guide is based on guidelines prepared by the Danish Centre against Human Trafficking. We were involved in preparing the publication.

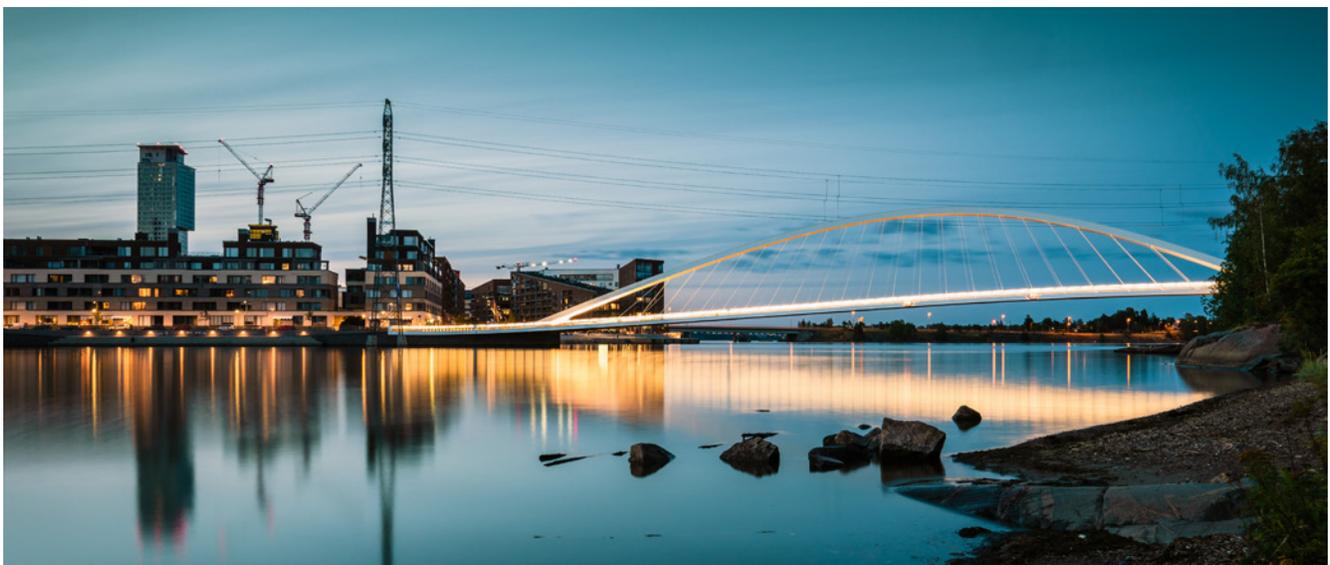
Involvement in the #EU4FairWork campaign

During the #EU4FairWork campaign's week of action, we organised the webinar "Employee rights in Finland". It was intended specifically for immigrants and those working with them. The Finnish-language webinar consisted of three sections:

- Working time, pay, employment contract and equality
- Occupational safety
- Problems at work – what can an employee do and where can they get help?

About 250 people attended the webinar. In addition, some followed the webinar with a group. Video recordings of the event have been viewed a total of 740 times on YouTube. Video recordings and presentation material from the webinar have been marketed to authorities, educational institutions and organisations, for example, so that they can share the information in their own channels.

In addition, during the week of action, we carried out inspection activities on construction sites with the Tax Administration and on restaurants with the police. We communicate inspection activities and other grey economy themes on social media on the accounts @tervettatyota and @tilaajavastuu. The tweets of the week of action received a total of approximately 10,000 views.



Iceland

Key figures for the Icelandic labour market

Iceland's population is roughly 365.000 as of January 2020, of which are approximately 209.000 participants in the local labour market. This amounts to an 81% labour participation of individuals aged 16-74. Labour market participation is very high for both genders. The Icelandic labour market has historically enjoyed below-average unemployment compared to the EU-28 average. This has led to the Icelandic labour market being on the receiving-end for foreign labour, seasonal workers and posted workers.

Wages and other terms of employment concluded in collective agreements are by law minimum terms, applying to all workers in the applicable occupation within the geographical area covered by each agreement. Employers are prohibited to negotiate terms and conditions of employment which violate the terms of the collective agreements, and contracts that do so are invalid by law.

Collective agreements cover approximately 88% of the workforce and labour union density in Iceland and is among the highest in Europe, or 85% of employees.

Labour market inspections in Iceland can be divided into two categories: General workplace inspections carried out by labour union representatives, and inspections carried out by authorities on the grounds of their specific competences.

The authorities that carry out inspections in Iceland are the following:

Authority		Role in UDW capacity.
Skatturinn e. Iceland Revenue and Customs	www.rsk.is/english	Responsible for enforcing correct taxation and registration of income.
Vinnumálastofnun* e. Directorate of Labour	https://www.vinnumalastofnun.is/en www.posting.is	Responsible for registration and inspection of temporary work agencies, posted workers and temporary work permits for third country foreign nationals. Also responsible for inspections related to benefit fraud in relation to unemployment benefits and parental leave.
Vinnueftirlitið* e. Administration of Occupational Safety and Health.	https://www.vinnueftirlit.is/english	Occupational Safety and Health. Carries out training, research, inspections, and licensure in within the field of OSH and operation of machinery and technical equipment.
Lögreglan e. Police	https://www.logreglan.is/english/	Support to other authorities as well as specific competences regarding foreign labour.

*Participants in the NBUDWP

UDW elements:

Undeclared work is as present in the Icelandic labour market as it is in other European countries. Although no UDW specific statistics are gathered regularly by public authorities it is the general consensus among inspection authorities and the social partners that undeclared work is a very real problem. Undeclared work, partially or wholly, is unfortunately too often the result of ignorance of the parties involved. This is particularly true of newly formed companies with limited experience as well as posting companies that have failed to inform themselves of the domestic rules and legislations. There is also increased risk in cases where foreign workers are involved where limited knowledge is in place on their rights and resources. In all these instances however, there is room for improvement on all accounts and opportunities for strategic communication.

For the first time a multi-authority working group was established under the Ministry of Welfare in 2018 with the aim to combat work related crime and social dumping. Within the directives of the working group was to address the lack of communication material in this category both for workers and inspectors. This work is ongoing.

GIG elements:

GIG elements and platform-based work has not been fully integrated into the Icelandic labour market. This may stem from a generally low unemployment rate in the past and high labour participation in conventional work forms. Many choose to work partially as self-employed individuals taking up occasional work through informal digital channels.

Iceland has not introduced legislation specifically to accommodate and define a GIG worker in terms of labour law and occupational health and safety. Workers are generally defined primarily from taxation point of view, classifying them as either employees or self-employed and as such either declared or undeclared.

Regulation regarding incorporation, licensure and taxation have not been favourable to the most common GIG platforms which as a result, are not present in Iceland. The size of the Icelandic market may also be a contributing factor. The largest conventional GIG platform in Iceland would be Airbnb although it is estimated that 80% of the revenue produced through the platform in Iceland stems from 30% of the users, who rent out more than one apartment full time.

Statistics and data on GIG workers in Iceland have not been systematically collected by any government agency on a regular basis. The data available is scarce and collected through surveys and one-time data collections often via non-governmental bodies. The Government is currently working on a Green paper on labour market affairs which addresses this data gap and the extent of GIG work in Iceland. Considering absence of specific data on Gig workers and their prevalence the informal opinion is that a lot of the individuals involved in GIG activity do so part time or occasionally given how many people declare mixed incomes as employees and occasionally self-employed. The suspected demographic of a GIG worker in Iceland is young workers and foreign nationals but without sufficient data this can only be speculated.

To carry out efficient communication targeting this group the data gap needs to be bridged and better analysed to identify the most critical messages and target groups.

Communication methods

Preferred communication methods

The Directorate focuses on digital methods of communication, particularly on social media as it is both financially feasible and allows for very strategic target groups depending on the campaign. Banner ads on webpages of the national newspapers have also been useful when reaching a large portion of the nation and to garner general awareness on the matter. In case of large campaigns printed ads have been placed in the national newspapers to add weight and legitimacy to the campaign and to complement the online material where the main portion of the campaign is carried out.

Wallet sized paper pamphlets are used in case of posted workers and distributed by inspectors. This is the only printed material distributed by the Directorate.

When carrying out larger or more strategic campaigns the Directorate partners with media companies or communication experts outside of the authority.



As the Directorate is also a public employment service (PES) and the national coordination office for EURES the Directorate places strong communication emphasis on our website and digital service to workers and employers. The aim is to provide full online service to all those that request service from the authority. This includes a digital registration portal for posting companies and posted workers and an online posting registry.

Strengths in communication and challenges

The Icelandic labour market is very small. This offers both opportunities and challenges in communication. The size makes it easy and affordable to reach a large portion of working adults via social media. Due to size the distribution via social media and Google Ads is also cost efficient.

The size of the labour market is however also mirrored in the size and capacity of the government authority. As a result, most authorities do not have large communication departments. The workers that do handle communication on behalf of the authorities often are not dedicated to this specific task. There are often laterally built teams where communication is a minor role in the daily work of most of the employees involved. Different communication teams may be responsible for communication and website management, another with managing social media platforms and another employee may oversee press releases. Lateral teams and diversification can bring good ideas and resources to a small authority but may result in lack of conformity if not properly managed. Due to size larger projects and graphic design portions of communication are generally outsourced.

During the summer of 2019, the Directorate did a small social media campaign focusing on the duty of TWA's and Posting companies to register all their employees with the Directorate via our posting website. Despite the ads running for three months for a relatively small amount there was a noticeable increase in declared workers with companies already registered with the Directorate as well as increased traffic on the posting website. Response on social media was significantly better during weeks when the Jannis film from the previous project was distributed. The budget in this campaign was approx. 650 euros per month for a three-month period.

During this period the Directorate used targeted inspections to inspect high volume workplaces, where posted workers and temporary agency workers would be found, to follow up on registrations and inform the workers on their rights.

Involvement in the EU4FairWork campaign

Iceland participated in the EU4FairWork campaign carried out under the Platform for Undeclared Work during the year 2020. Due to conflicting campaigns during the summer focused on COVID-19 related resources the main participation in the EU4FairWork campaign was during and following the week of action in September 2020. During September, the Directorate distributed and shared UDW specific material, focusing on the two films produced during the current and previous NBUDW projects. The material was distributed on social media, specifically Facebook, Instagram and via Google Ads with higher-than-average reach and impressions.



Norway

Key figures for Norway:

- Population 5,3 million
- 11 counties and 356 municipalities
- 590.000 companies (350.000 self empl)
- 17 % (100.000) with more than 5 employees
- 2,6 million workers
- Unemployment 4,1%
- Major export: oil/gas, fish and technology
- Largest immigrant groups from Poland, Sweden, Pakistan, Irak and Somalia. A total of 14% immigrants
- Not a member of EU, but close relations trough the EEA agreement

Undeclared work

The Norwegian government has a strategy for combating crime in the workplace. It has 43 different action points. Several of them emphasises cooperation between different governmental branches. The Labour inspection, Tax administration, Police and Welfare/social administration are the key agencies in the cooperation to combat crime in the workplace.

The agencies get the same orders in their annual assignment/budget letters:

- Work related crime should be given **high priority**
- The agencies shall strengthen their **cooperation**
- The agencies shall establish a **formalized and practical cooperation**
- The agencies shall use the broad possibilities of the **different agencies means**
- The agencies shall establish better **knowledge** about work related crime actors and the extent of the problem

The challenges in some parts of the labour market are:

- Tax crime – violation of the Tax Assessment Act, the Tax Payment Act and the Value Added Tax Act
- Gross breaches of accounting and bookkeeping practices – incorrect and deficient accounting and use of fictional or incorrect documentation
- Gross violations of the Working Environment Act
- Exploitation of labour in breach of laws or agreements
- Bankruptcy crime
- Money laundering
- Human trafficking
- Violation of the Immigration Act – use of illegal workers
- Social security fraud - social security benefits while working illegally

GIG economy in Norway

GIG is a small part of the Norwegian economy, 0,02 % of GNP (Gross National Product) and 4,1% are self-employed. There are about 70-80 GIG-plattforms in Norway.

Most common sectors:

- Housing (airbnb++)
- Transport (with and without driver included, Foodora++)
- Service channels (WeClean++)
- Other services (ToGoodToGo+++)

Housing and transport are the major sectors when it comes to economic turnover.

In Norway there are no specific regulations for GIG work. The approach to the legislation relies on:

1. When employed in a GIG-company; all labour law regulations are applicable
2. When self-employed; important protection like working hours and payment are NOT applicable, relevant regulations for some kind of work, i.e safety issues

There are also significant different social security benefits when employed compared to being registered as self-employed.

Preferred communication methods combatting UDW

The Norwegian Labour Inspection Authority, the police, the Norwegian Tax Administration and the Norwegian Labour and Welfare Service have organised a broad-based collaboration on efforts to combat work-related crime. The three main goals are:

1. Key parties posing threats have experienced a substantial reduction in their capacity and intentions
2. Foreign employees have been empowered to safeguard their rights and fulfil their obligations
3. Consumers and employers/principals do not contribute to work-related crime through purchases of goods and services

As for communication being used as a tool to reach the goals, the efforts have been divided in two; 1) High visibility in the media and 2) communication targeting foreign workers.

To reach goal number 1. and 3. the agencies have prioritized **high visibility in the media**. Based on activities such as inspections and production of reports, the agencies have worked with PR and media. Pre Covid this work had great success and the agencies were quite visible with messaging targeting consumers, and deterring messaging of increased risk of detection.

For the labour inspectorate I Norway the most important communications activity to combat UDW is **targeting foreign workers**. The main objective is to empower them to safeguard their rights and fulfil their obligations, thus making them less vulnerable for wrongdoers with unlawful intentions. This backdrop has led to the communications concept "Know your rights". It started as a campaign and has been developed to make the foundation of all communication targeting foreign workers.





“Know your rights” campaign

Background

Foreign workers are a vulnerable group in the Norwegian labour market. They are more at risk for being taken advantage of by criminals and are more likely to suffer injuries and fatalities in the workplace than Norwegian citizens. The Norwegian labour inspectorate have had challenges with reaching foreign workers, so this time we wanted to implement a campaign with labour inspectorates in Bulgaria, Romania, Lithuania and Estonia.

The target group is primarily employees from Bulgaria, Romania, Lithuania and Estonia who work in Norway or plan to work in Norway. We have later translated the campaign to more languages and are making efforts to make the content available to as many foreign workers as possible.

Concept

Our research shows that higher salaries is the main motivation for foreigners to work in Norway. The campaign's main message is the right to a minimum wage. This message serves as a Trojan horse and will motivate employees to read more comprehensible information about rights and obligations in Norwegian working life that applies especially to this group.

To get the initial message across we made a short film showing workers having two sets of certain things. This could be two watches, two thermoses, two cars and so on. The message being – “you could be entitled to twice as much”.

The film was translated to different languages and promoted primarily using social media. It was also promoted using more traditional banner ads. The media habits of the target groups decided where the film was promoted.

When using Facebook for the ads, we made arrangements with our collaborating labour inspectorates to moderate comments and to answer questions. This was both as a preventive measure in case of virality gone wrong, and to get feedback from the target groups during the campaign period.

All the promotional efforts were made to direct the target groups to our campaign website www.knowyourrights.no. On this site we presented the most important information foreign workers must be aware of when they work in Norway.

Results

After three weeks of advertising the campaign had fairly good results.

- Reached 78,325 on Facebook with 11,000 click-throughs
- 70,000 ad views on YouTube
- 78,616 reached with banner ads
- 28,213 unique visitors on our campaign website
 - » 8,874 from Rumania
 - » 10,322 from Lithuania
 - » 8,388 from Bulgaria
 - » 3,079 from Estonia

Taking into consideration that our main target group (men between 20-50 working in Norway) consists of about 60 thousand individuals, the results are quite good.

The analysis of our campaign site shows that the users are most interested in information about wages and working hours. We are however

pleased to see that other information regarding HSE and other subjects are also being read. Because of covid information about termination, dismissal and temporary lay-off has also been important information to have on the campaign site.

We are still in uncertain times with the borders opening and closing and rules about quarantine for foreign workers changing constantly. The campaign has been affected by this and we have postponed it and prioritized information about corona when targeting foreign workers. If the circumstances allow it, we are planning a second pulse of advertising “know your rights” sometime during the spring of 2021.

Involvement in the EU4FairWork campaign

Norway participated in the #EU4FairWork campaign. We shared some of the content provided by the campaign in social media and wrote a op-ed about the campaign that was published in three Norwegian newspapers. We had planned additional communication activities in relation to cross border inspections, but due to covid this was cancelled. During the week of action we launched the “know your rights” campaign, so this took most of our attention.

Our experience was that the activities we planned and executed ourselves had the best reach. The content provided by the campaign was a bit too generic and didn't hit home with our target groups.



Sweden

Key figures for the Swedish labour market

According to Statistics Sweden, Sweden's population is roughly 10.3 million inhabitants by the end of 2020. There were about 5.5 million people aged 15–74 years in the labour force. The relative labour force participation rate was 73.0 percent.

About 5.1 million people aged 15–74 years were employed. The employment rate was approximately 67 percent. The number of employed women was about 2.4 million and of employed men about 2.7 million.

There were almost 4.6 million employees. Among women the number of employees was 2.2 million and among men 2.3 million.

There were 0.45 million unemployed people aged 15–74 years, which corresponds to an unemployment rate of 8.2 percent. For women it was 8.4 percent and for men 8.0 percent.

In Sweden, there is no minimum wage law. However, wages and other terms of employment may be stipulated in collective agreements that are negotiated by employer- and employee-representative organisations (trade union). There are about 55 employer representative organisations and 60 employee representative organisations. According to the Swedish National Mediation Office about 70 percent of the employees in Sweden are members of an employee representative organisation, but 90 percent are still covered by a collective agreement. The reason is that employers who have a collective agreement have to apply it for all their employees whether they are members of an employee representative organisation or not. In total, there are about 700 collective agreements in the Swedish labour market.

Work place inspections in Sweden are carried out by governmental agencies on the grounds of their specific competences. Employer- and employee-representative organisations are responsible for controlling that actual terms of employment are in compliance with the collective agreements.

Several Swedish governmental agencies cooperate to combat work-related crime. The Swedish Work Environment Authority coordinates the cooperation. Below you will find the participating agencies.

Agency		Role in UDW capacity
Swedish Economic Crime Authority	https://www.ekobrottsmyndigheten.se/en/	Investigates economic crime, which appear in other agencies checks. Identifies risk industries and potential objects to be checked.
Swedish Gender Equality Agency	https://www.jamstalldhetsmyndigheten.se/en	Provides competence in the field of human trafficking and exploitation of labour force.
Swedish Migration Agency	https://www.migrationsverket.se/English/Startpage.html	Checks if a person is entitled to work or be in the country.
Swedish Police Authority	https://polisen.se/en/	Checks if the workers have a work permit or the right to be in the country. Can also discover trade in human beings, exploitation of work force and the use of false documents.
Swedish Public Employment Service	https://arbetsformedlingen.se/other-languages/english-engelska	Checks if the employer follows the rules which are decided for subsidised employments.
Swedish Social Insurance Agency	https://www.forsakringskassan.se/	Checks if workers are entitled to social insurances.
Swedish Tax Agency	https://www.skatteverket.se/servicelankar/otherlanguages/	Checks registers of staff and cash registers.
Swedish Work Environment Authority	https://www.av.se/en/	Checks that compliance with rules on work, working hours and posting.

UDW elements

There are several industries where it is more common with unhealthy competition than in others. Some of these are the construction, transport, cleaning and restaurant industries.

In 2020, the Swedish Work Environment Authority, made an enquiry about the conditions for entrepreneurs in the construction and the transport industries. It included questions on violations of rules and opportunities to be competitive in the long term. 1 336 of 6 000 companies replied. Despite the low response rate of only 22 percent, the results give some indication of their situation. About 4 out of 10 employers felt that there is some kind of fraud in their industry. About 5 out of 10 employers felt that there is a small risk for cheaters to be discovered by authorities.

In 2018, the Authority, made an enquiry in the cleaning industry, which showed that 5 out of 10 employers felt that many companies are forced to break the rules on work environment and working hours in order to cope with the competition.

The Authority also made an enquiry in 2017 in the construction, transport, hotel, restaurant, agriculture and forestry industries. It showed that 3 out of 10 employers felt they had to circumvent the rules.

GIG elements

In some countries, the gig economy is widespread, such as in the USA. In Sweden and the Nordic countries, the gig or platform economy is still small, but it has expanded quickly in recent years. A Swedish study shows that around 12% of all people aged 16-65 in Sweden have performed an assignment through a digital mediation platform. Most do not have this as their main occupation⁸.

The Swedish Work Environment Authority is conducting a pilot project consisting of inspections focusing on new ways of organising work. The purpose is to examine how the Swedish work environment legislation can be applied to self-employed companies and digital platform companies.

The project is to give more knowledge of how these forms of organising work affect the work environment and the conditions for preventive work. The aim is to carry out 50 inspections during 2019-2021. The Authority will present its final report in February 2022.

Communication to promote a healthy working life

Since 2018 eight Swedish governmental agencies are working to develop methods for cross-agency checks. The Swedish Work Environment Authority coordinates the work and the purpose is to

combat fraud, violations and crime in working life. The agencies also have jointly carried out checks in different industries where there is a high degree of these type of irregularities.

Common strategy ensures coordinated communication

There is a communications group linked to this cooperation with representatives from the eight agencies. In order to reach out with messages and information in an effective way, the communications group has planned and coordinated communication activities. The activities are based on a common strategy, which aims to create awareness of the agencies' checks and to influence the behaviour of employers, companies, employees and the general public. In this way, communication can help reduce crime in working life.

Based on the strategy, the authorities have communicated the results of the inspections and checks they have carried out together across the country in the construction, restaurant, beauty and transport industries. Target groups for external communication have mainly been employers and entrepreneurs, interest groups, journalists and politicians.

The purpose has been, among other things, to

- give knowledge of crimes in working life and their consequences.
- discourage from deliberately breaking rules by creating awareness that the authorities cooperate in these checks and that there is a risk to be discovered and have some kind of sanction.
- strengthen confidence in the authorities' ability to maintain a safe and secure working life
- strengthen employers' willingness to do the right thing.

Greater attention to work-related crime in public debate

The communication has taken place through press releases and interviews in the media and dissemination via social channels. In January 2020, the agencies arranged a joint press conference on their work and results in 2019, which had a major impact in the media.

Each communication effort has generated an average of about 80 articles in traditional media. The reach (number of possible readers) has varied between about 6.5 and 8 million readers. Overall, the agencies believe that communication has contributed to giving greater attention the issue of work-related crime in the public debate.

Preventive communication to complement rules and checks

Crime in working life cannot solely be mastered by agency checks. There is also a need for preventive measures where communication can be used as a means to affect both suppliers and buyers. The



communications group has discussed how to reach those employers who want to do the right thing, who unknowingly make mistakes or who break rules to cope with competition. Other possible target groups are professionals or private individuals who buy services. The aim is to show the consequences of breaking rules for employees, other companies and society as a whole in order to create awareness and influence people's norms and values.

Communication to create awareness of changed posting rules

EU rules and consequently Swedish rules on posting changed on 30 July 2020. To create awareness and knowledge of the changes among different target groups the Swedish Work Environment Authority worked according to a communications plan. The plan also included communication about the work to update the Authority's Report a posting service.

External target groups included employers in other countries that post workers to Sweden, Swedish recipient of services, workers who are posted in Sweden, and employer- and employee-representative organisations. Important internal target groups were administrative officers dealing with the Report a posting service and posting register, co-workers inspecting posting, the customer service function and the press function.



Proactive communication about obligations and rights

The purpose of the communication were to

- provide all target groups with knowledge of the implications of the changed rules, why they are introduced and how they relate to the use of the service Report a reporting
- make employers posting workers to Sweden to report at the right time and make them understand the consequences of not doing so
- give recipient of services knowledge of their responsibility and that posted workers should have the same rights as employees in Sweden
- give posted workers in Sweden knowledge of their rights
- give the Swedish Work Environment Authority's co-workers knowledge of how the authority works in practise with needs-driven development and digital services.

Different channels depending on the target group

To fulfill these purposes, here are some examples of the external communication activities that have been carried out.

When the Swedish Parliament had adopted the changed posting rules on 17 June:

- news articles at the Swedish Work Environment Authority website
- notification in the service Report a posting
- messages in the Authority's social media channels

- e-mail with information notification to employers who are holding an account in the service Report a posting
- e-mail with information notification to Swedish employer- and employee representative organisations

When the rules came into force on 30 July:

- updated information about the existing rules at the Swedish Work Environment Authority website.

In 2021 the plan is to inform employers and workers about their obligations and rights through their representative organisations in the countries and industries that are mainly posting workers to Sweden.

The internal communication activities included

- questions and answers for co-workers at the customer service function and the press function
- news articles and cohesive information at the Authority's internal website
- digital education in PowerPoint-format for inspectors.

Some important factors to be successful in the communication have been to

- be proactive and communicate before the changed rules entered into force
- use plain language in all communication
- develop a user-friendly, self-explanatory, service for reporting posting.

Nordic-Baltic Undeclared Work Project

Sweden through the Swedish Work Environment Authority actively contributed to the work of the joint projects carried out by the Nordic-Baltic Communications group as described under the General section of this handbook.

To create awareness of all the work done within the Nordic-Baltic Undeclared Project, the Authority also spread information internally about the role and tasks of the steering group and the different working groups. This was done through a series of news articles on the Authority internal website.

Communication within the EU4FairWork campaign

Sweden through the Swedish Work Environment Authority participated in the #EU4FairWork campaign during March-September 2020. The campaign was an initiative of the EU platform working to combat undeclared work.

Visualising consequences of unfair competition

Member States were encouraged to use social media as part of the campaign. At regular intervals during the campaign period, the Swedish Work Environment Authority posted short videos on LinkedIn and Facebook directed at employers and workers in different industries. The videos highlight work environment risks and incidents following unhealthy and unfair competition. The messages stressed everyone's right to a good work environment and to work against unfair competition and for fair work.

Engaging other countries to combat unfair work in the transport industry

Member States were also encouraged to organise an activity during a special activity week in September. The Swedish Work Environment Authority decided to raise problems relating to undeclared work in the transport industry. The reason was that the industry struggles with different types of irregularities in several EU member states. Many of these irregularities are of cross-boarder nature and would benefit from closer cooperation between Member States.

The Nordic-Baltic Undeclared Work Project therefore organised a webinar on 23 September on challenges and opportunities in the transport industry. Concerted inspections in some countries took place before the webinar. The purpose was to present the findings of these inspections, raise industry specific problems and to discuss possible solutions to them. Participants in the webinar were civil servants such as inspectors, experts and legal advisers from public authorities responsible for work environment, labour inspections, police matters and customs in the Nordic and Baltic countries. Representatives of the European Labour Authority and of the social partners in the transport industry also participated.

Information about the inspections in Sweden were posted at the Authority's channels on LinkedIn and Facebook, which created many reactions from people in the industry. The outcome of the webinar was summarised in a news article at the Authority website and in a report. The European Commission and the EU-platform tackling undeclared work supported in spreading information about the activities on their website, social channels and in newsletters.



