

Joint Recommendations

for the Development and Interoperability of Social Identity Cards in Construction and Considerations for a Pilot Project



Social identity cards in construction (SIDE-CIC) project

A Joint-Project of the European Social Partners for the Construction Sector on Social Identity Cards in Construction

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The recommendations and considerations have been developed in collaboration with the affiliates of EFBWW and FIEC.



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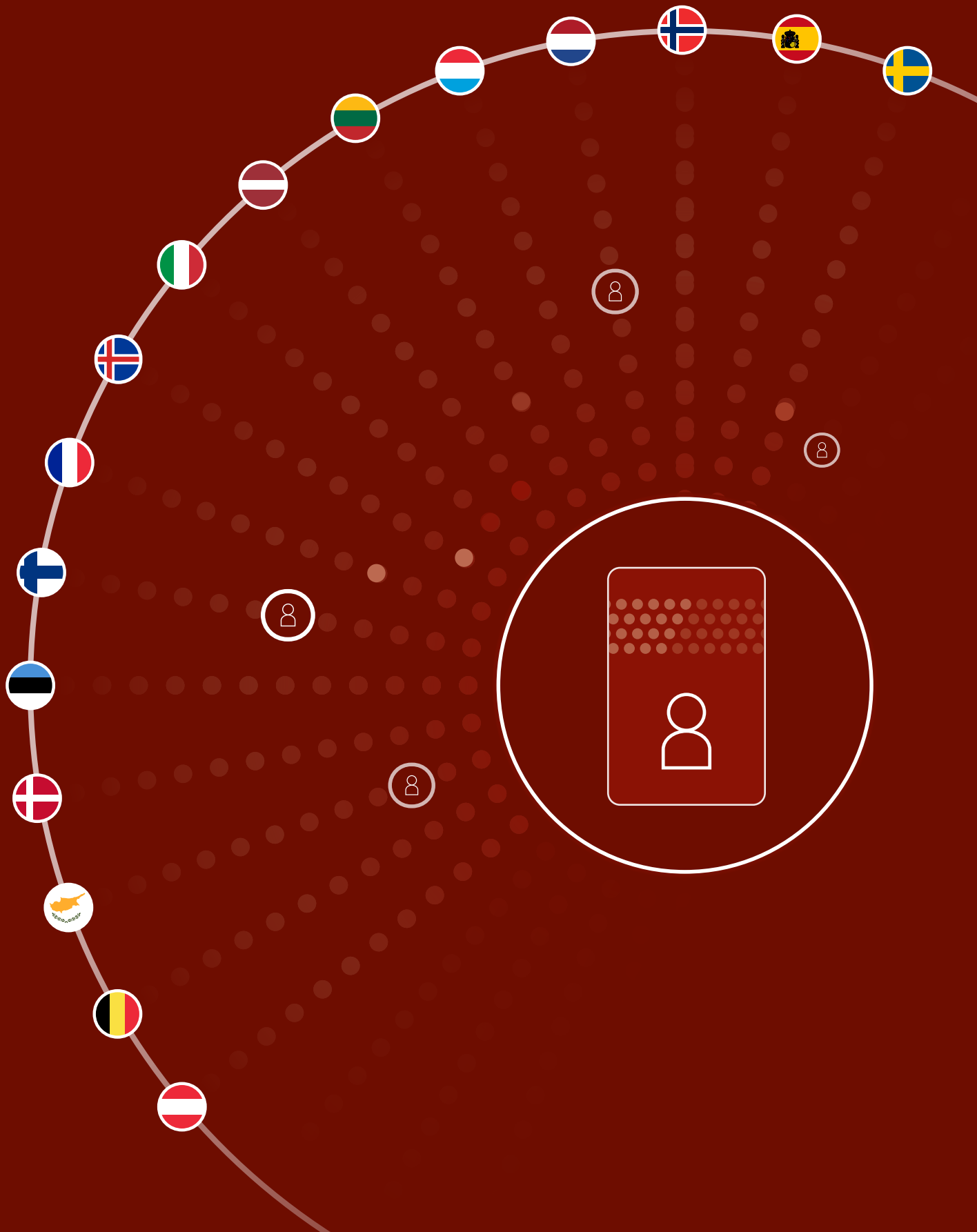
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Introduction



The SIDE-CIC project aims to contribute to the development of an EU legal framework that would enable the interconnection of national social ID card schemes. By identifying best practices and addressing potential regulatory gaps, the project seeks to provide the building stones for a regulatory and technical framework.

These recommendations draw on the findings of the SIDE-CIC project, in particular the results of the mapping exercise and the two feasibility studies,¹ which analysed existing systems across the European Economic Area (EEA) and assessed possible technical and legal pathways for cooperation and interoperability of those card schemes that have opted to participate in the feasibility studies². The purpose of these recommendations is to guide Member States and social partners to better interconnect their schemes and to support the ones that wish to develop and improve social ID cards.

FIEC and EFBWW underline that these recommendations are not binding. They are intended as a reference tool to inform national discussions, not as a prescriptive framework. The two organisations recognise the autonomy of national social partners, the specificities of the existing social ID card schemes in place and the diversity of institutional settings across the EU.

These recommendations also serve to set out a legal framework that can support Member States in the development or revision of national social ID card schemes. This includes guidance on governance models, legal design, data requirements and technical specifications. The intention is to provide a structured reference that helps ensure national schemes are effective and compatible with EU law and are able to operate without risk of legal uncertainty.

¹ The Mapping Report and the legal and technical feasibility studies are available on the websites of [EFBWW](#) and [FIEC](#).

² As set out in the project application, the Spanish "Tarjeta Profesional de la Construcción" (TPC) is not included in the feasibility studies and therefore is not in the scope of the recommendations.

Part I

National Social ID Card Systems



COMMON PRINCIPLES FOR ALL MEMBER STATES

This first set of recommendations address the common principles for all Member States: addressing firstly those without a card scheme before addressing those with an existing card scheme.

Social ID cards are already used in several Member States and have proven to offer many benefits for enforcement and inspection bodies, employers and workers. Based on the evidence gathered during the SIDE-CIC project, FIEC and EFBWW recommend that all Member States consider introducing a social ID card system for the construction sector. These cards should be mandatory for all workers present on site, regardless of employment status or nationality.

In most of the social ID cards identified in the mapping report, the main function of these cards is to demonstrate the link between the worker and their employer for the purposes of inspections, project management and accessing rights. They allow labour inspectors to more easily detect undeclared work, bogus self-employment and other forms of illegal practices and help in the fight against social dumping.

Social ID cards also help fostering compliance with the Posting of Workers Directive, occupational health and safety (OSH) rules and social security coordination. They also help facilitating cross-border labour mobility by allowing inspectors and site managers to verify that all workers are properly registered and documented.

Furthermore, social ID cards can also improve transparency around training records and qualifications. Evidence gathered through national schemes shows that such cards can reduce administrative burden for employers, contribute to safer worksites by lowering accident rates and improve competitiveness by enhancing accountability and oversight throughout the subcontracting chain.

1. RECOMMENDATIONS FOR MEMBER STATES WITHOUT A CARD SCHEME

General recommendations

Recommendation 1

All Member States should consider introducing a Social ID card scheme for construction

The SIDE-CIC mapping report has shown that social ID cards can play a useful role in addressing challenges around occupational safety and health (OSH), cross-border mobility, undeclared work and enforcement. In countries where such schemes are already in place, interviews with social partners indicate a high degree of satisfaction with how they function. The fact that discussions are ongoing in countries such as Denmark, the Netherlands and Romania shows that there is real interest in expanding the use of social ID cards across the EU.

FIEC and EFBWW therefore recommend that all Member States consider the development and introduction of such a system, in close cooperation with the national social partners for construction. This would better ensure that card schemes reflect the needs of both workers and employers as well as the realities of the sector.

Recommendation 2

Information to be covered

The effectiveness of a social ID card depends on the scope, quality and relevance of the information it contains. Based on the findings of the SIDE-CIC project and the experience of existing national schemes, FIEC and EFBWW recommend that Member States consider including the following categories of information. These elements have been identified as useful for the card to fulfil its core functions: verifying identity, demonstrating the employment relationship, supporting inspections and ensuring compliance with national and EU law.

- **Worker information** (name, first name, photograph, date of birth, national identification number)
- **Card information** (validity period, card number)
- **Employment information** (type of contract, contract duration, work location)
- **Legal and administrative status** (health insurance, residence and work permit, where applicable)
- **Employer details** (e.g. company name, company address, tax number)
- **Worker training records and professional qualifications** (particularly regarding OSH)

Some of this information may be printed on the physical card, while other elements could be made accessible via a QR code or chip and read from a secure database. This approach allows for layered access depending on who is scanning the card and for what purpose.

In the case of posted workers, FIEC and EFBWW also recommend that the information available on the PDA1 form be made accessible through the card, for example, by linking to a secure database retrievable via QR code, RFID or readable electronic chip. This would allow inspectors to verify social security coverage directly on site using a reader or mobile device, without relying on physical documentation.

Recommendations on the implementation models

There are two main models that have been identified for the implementation of social ID card schemes in the construction sector. In some countries, cards are managed by public authorities. In others, they are developed and operated by social partners, jointly or either by an employer organisation or a trade union only. Both models have strengths and weaknesses, as highlighted in the feasibility studies.

FIEC and EFBWW recognise that the choice between these models depends on the national context and institutional setup. It is therefore for the sectoral social partners in each country to assess which model and design features best suit their needs and ensure the most effective functioning of the scheme. Regardless of the model chosen, certain key elements should be taken into account to ensure that the system delivers added value for workers, employers and enforcement authorities. FIEC and EFBWW do not favour one model over the other. However, they stress that certain elements are essential to ensure that whichever model is chosen operates effectively and delivers real value for workers, employers and enforcement authorities.

First, we will present some recommendations for cards managed by public authorities, before looking at recommendations for cards managed by social partners.

Cards managed by public authorities

Publicly managed schemes are mandatory by law and typically ensure coverage of the entire workforce. They also tend to be better integrated into national enforcement systems and databases. On the other hand, they may lack flexibility, since any significant change to the system usually requires amendment to legislation or a government decision, which can take time.

Recommendation 3

Ensure that the system is compatible with relevant existing EU tools and aligned with emerging ID authentication frameworks

Publicly managed social ID card schemes should be compatible with EU instruments that support enforcement and the coordination of social security rights. In particular, the card should allow access to the information related to the PDA1 form, which confirms applicable social security legislation during posting and to the European Health Insurance Card (EHIC), which ensures access to healthcare during temporary stays in another Member State.

Enabling inspectors to access this information through the card, for example, via electronic chip, RFID or QR code, would support on-site checks and reduce reliance on physical documentation.

Member States should ensure that national schemes are adaptable to future developments at EU level. Two ongoing initiatives are especially relevant in this context and Member States are encouraged to take their requirements into account to ensure long-term interoperability.

First, the European Social Security Pass (ESSPASS) which aims to digitalise social security documents including the PDA1. Second, the EU Digital Identity (EUDI) Wallet is intended to provide a secure and verifiable way to store and share personal credentials, including employment or social security-related information. Member States that want to adopt a social ID card, should proceed with its adoption already thinking about the possibility for the workers to upload the cards into the EUDI wallet which is about to be launched and ready to use in the upcoming future. Workers could use the EUDI Wallet as a tool to provide their consent for instance. Hence, Member States could, mainly at technical level, plan the adoption of a card around compatibility with the Wallet.

Recommendation 4

Develop a strong enforcement system with penalties for non-compliance

The effectiveness of a social ID card scheme depends on its consistent use across the sector. In schemes where the card is mandatory by law, this requires a clear legal framework defining the obligations for workers and employers and the consequences of non-compliance. In voluntary schemes, it should be explored how enforcement mechanisms could be integrated into the system itself, for example through collective agreements, site access rules or contractual obligations with clients or contractors, as well as other instruments.

In either case, FIEC and EFBWW recommend that non-compliance be treated as a serious issue. Labour inspectorates or the relevant enforcement bodies should be fully informed of the requirements and equipped to check compliance during site visits. Where legal penalties apply, they should be clearly defined. In voluntary schemes, enforcement may take the form of exclusion from certain sites, reputational consequences or contractual sanctions. The collection of penalties, fines or corrective measures should be systematic.

Recommendation 5

Ensure that the legal framework allows for adaption

Labour law is changing and social ID card schemes will need to adapt to new regulatory frameworks and requirements. In this context, the legal framework should allow for changes to be made to the scheme and these changes should be possible and happen quickly. This applies to updates in the data collected, technical functionalities or governance structures.

Additionally, for the interoperability of social ID card schemes, the legal framework should also allow public authorities to join a data space* or sign a bilateral agreement to facilitate interconnectivity. Without such flexibility, national schemes risk becoming isolated and less effective in responding to cross-border challenges.

FIEC and EFBWW therefore recommend that adaptability and the possibility for cooperation be built into the legal basis of any new system.

* Data spaces are shared systems that let trusted organisations exchange and use data securely

Cards managed by social partners

In some Member States, social ID cards are developed and managed by social partner organisations: Either through the employers and workers representatives together (e.g. in Austria) or only by one of the social partners (e.g. in France). Cards managed by social partners may also involve paritarian institutions.

This model has the advantage of higher flexibility and may be easier to align with similar schemes across borders as social partners have greater freedom in reaching agreements cross border than schemes managed by state authorities, as discussed in the legal feasibility study. However, these schemes tend to have more limited coverage, especially where the scheme is not backed by law or (universally applicable) collective agreements. In some cases, there may also be no formal enforcement mechanisms, which can reduce the reliability and reach of the scheme.

In the case where the social partners choose to introduce and manage a social ID card scheme, FIEC and EFBWW recommend the following:

Recommendation 6

Ensure that the collective agreements allow for interoperability and that social partner organisations can sign cross-border cooperation agreements

Where cards are based on collective agreements, these should be developed in a way that enables co-ordination with other schemes. Social partner organisations should also have the possibility to enter into bilateral or multilateral agreements to facilitate interoperability and data exchange with counterpart organisations in other Member States.

Recommendation 7

Take steps to ensure the widest possible coverage

The usefulness of a social ID card scheme depends on the extent of its uptake across the sector. In the absence of a legal obligation, social partners should explore ways to expand coverage through collective bargaining, public procurement clauses, site access requirements or through agreements with major clients and contractors.

Recommendation 8

Develop appropriate enforcement mechanisms

Even in voluntary schemes, enforcement remains necessary to guarantee fair implementation and avoid unfair treatment. This may include agreed sanctions for non-use or site-level compliance checks. Hence, the aim should be to ensure that all parties who have agreed to the system are held accountable for complying with it.

Recommendation 9

Establish clear data validation processes

To support trust in the scheme and enable meaningful use of the data, it is important to have consistent procedures in place for verifying the accuracy and reliability of information collected. This could include periodic checks against national registers, links to official databases or the use of trusted third-party verification tools. Without reliable data, the effectiveness of the card is significantly reduced, particularly in the context of inspections or cross-border cooperation.

2. RECOMMENDATIONS FOR MEMBER STATES WITH AN EXISTING CARD SCHEME

Several Member States already operate social ID card schemes in the construction sector. These systems differ in scope, technical design and governance model, but all of them aim to improve transparency, accountability and enforcement on worksites. To support the long-term objective of interoperability and to strengthen the functioning of these schemes, FIEC and EFBWW recommend the following:

Recommendation 10

Align the scope of information provided by social ID cards

Some level of consistency in the scope of information provided by social ID card schemes across Member States would bring practical benefits for companies, employees and self-employed workers. When workers encounter similar systems across borders, it improves understanding, reduces administrative friction and makes it easier for businesses to meet requirements in different national contexts. It also supports the use of cards in large, cross-border projects or by multinational contractors operating in multiple countries. FIEC and EFBWW recommend that Member States consider coordinating the coverage of their schemes, including the inclusion of self-employed workers where relevant.

Such alignment of the information provided, however, must not affect the autonomy of social partners and national governments to decide on the features of their own cards.

In addition, aligning the categories of data collected would improve the potential for future interoperability. If schemes collect comparable types of information (e.g. identity, employer details, contract status and OSH training) it becomes more feasible to establish bilateral agreements, join a shared data space or take part in cross-border verification. These elements do not need to be identical but should be close enough in content and quality to allow data to be reused securely and meaningfully.

FIEC and EFBWW therefore recommend that Member States with existing schemes reflect on the scope and structure of their cards in light of these two objectives: improving the experience for users and increasing the feasibility of interconnection.

Some schemes currently do not apply to self-employed workers, while others do. Although there is no general legal barrier to their inclusion, national laws or collective agreements establishing the schemes may need to be amended to extend the personal scope. In practical terms, such a change would also require a decision on who is responsible for obtaining the card. Including self-employed persons in the scope of social ID card schemes could support enforcement efforts by helping to address 'bogus' self-employment, especially if the card allows inspectors to verify compliance with mandatory training and other obligations on site.

FIEC and EFBWW therefore recommend that Member States and their relevant authorities consider coordinating the coverage of their schemes, including the inclusion of self-employed workers where relevant.

Recommendation 11

Ensure that the technology used is up to date and allows for real-time access to information

The technology embedded in social ID cards should be state of the art. This includes not only the physical card and its security features, but also the underlying digital infrastructure. Each system should be supported by a secure database that can be accessed in real time by authorised users, particularly for the purposes of inspections and site access control.

Recommendation 12

Make PDA1 documents accessible through the card system

To ease inspections related to posted workers and social security coordination, FIEC and EFBWW recommend that the PDA1 be made accessible through the card. This could be achieved by linking the card to a secure database, allowing inspectors to verify the worker's status directly on site.

Recommendation 13

Explore options for interoperability with other schemes

Member States with existing social ID card systems, especially those managed by social partners, are encouraged to explore different forms of cooperation. These may include:

- Bilateral agreements with other countries as a way to ensure interoperability at a smaller scale
- Participation in a sectoral data space, which could initially involve a limited number of schemes and expand over time
- Development of a common interoperable scheme across several Member States, coordinated by social partner organisations even in the absence of full EU-wide adoption

These approaches are not mutually exclusive and may evolve over time. FIEC and EFBWW recommend that Member States consider the most practical entry points and build up cooperation gradually.

Part II

Interoperability and EU-Level Measures



Interoperability between national social ID card schemes could bring significant added value. By making identification information accessible across borders, this could improve enforcement and detection of social fraud, worker-employer relationships, simplify cross-border documentation processes and reduce administrative burden for employers and authorities.

The primary users of interoperable features would include labour inspectorates, enforcement bodies and employers operating across different jurisdictions. In a sector with high levels of mobility and complex subcontracting chains, being able to verify essential information across systems can be a real added value. The following recommendations are based on the findings of the feasibility studies.

Technical Framework for Interoperability

Interoperability requires technical conditions for secure and verifiable data exchange between systems. At present, it is often difficult for worksite managers to verify foreign employees' identities and data. Employers and inspectors also need to obtain reliable data from trustworthy sources when issuing a card, particularly for workers coming from abroad.

Recommendation 14

Establish a system to ensure that data are trustworthy and exchanged in a secure way

A scheme is needed to rank the trustworthiness of data sources. FIEC and EFBWW recommend that systems outline trust level standards according to the levels of assurance defined under eIDAS (Electronic Identification, Authentication and Trust Services). This would help distinguish between verified and non-verified data.

A secure method for data transfer across borders should be implemented, so that workers' data can be accessed even in another EU country. Secure data exchange is fundamental for getting parties to participate in and sustain a cross-country network or ecosystem.

As national card systems collect and check data in different ways, it is not possible to recognise each other's cards unless the information can be trusted to the same degree. Hence, when the level of trust of the data collected through the cards does not match, there cannot be mutual recognition. If all cards could have the same level of trust in terms of data validity, then an interoperable system between all the cards can be built starting from there. This can be done through "mutual recognition agreements" or through the creation of a data space where rules on the data validity are established in its "constitution" documents.

Recommendation 15

Facilitate the exchange of data not otherwise available

To support cross-border operations, there must be a way to obtain required information from another card scheme if it is not directly stored within that system. This could include investigating the use of existing platforms such as ESSPASS, the IMI system or other relevant EU-level tools to access and verify the necessary data or to consider the establishment of a joint Ecosystem.

Recommendation 16

Ensure compliance with GDPR through a joint model for consent management

Cross-border data exchange must comply fully with the General Data Protection Regulation (GDPR). FIEC and EFBWW recommend that a common model be developed to handle consent management. This could be through the adoption of a Personal Data Intermediary model where a neutral party provides this joint service. This would allow workers to authorise the sharing of their data in a transparent and controlled way, while ensuring that receiving authorities are able to access the information they need.

Governance and Cooperation

In addition to technical considerations, the following recommendations look at cooperation between card providers and institutional stakeholders as it is essential to create trust and facilitate the practical functioning of an interoperable ecosystem.

Recommendation 17

Encourage bilateral agreements for interoperability between Member States with existing schemes

Member States with functioning social ID card systems should be encouraged to pursue bilateral agreements to enable structured cooperation. This could begin on a smaller scale and progressively expand to include additional schemes or countries.

These initiatives should be developed with the involvement of national sectoral social partners to ensure that the agreements reflect the specific needs of the construction sector in each country.

Recommendation 18

Develop a governance model for the SIDE-CIC ecosystem

As part of the ongoing process, a governance model for the SIDE-CIC ecosystem should be developed. Draft ecosystem agreements between cards providers should be prepared early on to test their functionality in practice. This process can also serve to establish a Trust Network of card providers, based on shared rules and conditions for participation.

FIEC and EFBWW, as the recognised EU-level social partners for the construction sector, should be involved in the establishment of the ecosystem. Additionally, they should have a role in the oversight and strategic direction of the organisational setup (such as through participation in a board or steering structure) to ensure that the system reflects the interests of both employers and workers and remains anchored in the sector's specific needs.

Recommendation 19

FIEC and EFBWW will promote the alignment of national card schemes in three key areas

To support the development of interoperability, FIEC and EFBWW will encourage coordination between Member States on the following elements:

1. The way the data are collected
2. The types of data collected (as outlined in Part I)
3. The intended purposes of the card: these may include facilitating fair labour mobility, recording training, tackling undeclared work, controlling access to construction sites and supporting inspections

Recommendation 20

Call on the European Commission to support the interoperability of social ID cards

FIEC and EFBWW recommend that the European Commission promotes efforts towards interoperability through financial and administrative support for pilot projects or bilateral agreements as well as technical assistance to ensure systems are compatible with ongoing EU digitalisation efforts.

This would be in line with the Commission's broader priorities on the digitalisation of social security, as outlined in recent communications. If the European Commission proposes EU legislation to establish a European approach to a Labour Card for the construction sector, it must promote systems in place and respect the autonomy of the involved social partners. Such a step must be progressive and based on voluntary participation. It should avoid replicating the shortcomings of previous initiatives, such as the e-Declaration system, as well as creating unnecessary burdensome procedures.

Recommendation 21

Member States developing or considering developing social ID card schemes should plan for future interconnection

For those Member States considering or currently developing social ID card schemes in the construction sector, EFBWW and FIEC recommend designing these schemes with potential future interconnection in mind. This includes considering ongoing EU-level initiatives such as the ESSPASS and the EUDI, which could help support secure data sharing and identity verification. As such, Member States should also consider the requirements and governance framework set out in the Interoperable Europe Act (Regulation (EU) 2024/903), which establishes a legal foundation for cross-border digital public services and promotes the reuse of interoperable solutions between national authorities. Article 3 of the Interoperable Europe Act requires public authorities to conduct an interoperability assessment before introducing any public service that has a cross-border nature.

Part III

Considerations for a Pilot Project



STRATEGIC FOUNDATIONS OF THE PILOT

The SIDE-CIC project was conceived to explore the current usage of social ID card schemes across the EU as well as the legal and technical feasibility of interconnecting national social ID card schemes. The project has revealed that there is a political will to pursue a pilot project on the practical implementation of its recommendations to go towards more interoperability between the different national schemes. As such, the work done through the mapping and feasibility studies has revealed the options and challenges of designing a pilot project as a follow-up to the project. A number of card providers have expressed interest in putting in practice the possibility of interconnection between the different schemes.

At the same time, both EFBWW and FIEC are aware that a pilot project would be a significantly challenging undertaking, as there are real constraints and considerations that need to be considered. Legal compliance, especially with data protection rules, would need to be watertight. Likewise, the practicalities of involving public authorities, inspectors, contractors and construction projects as well as the financing are considerations which should not be underestimated. Additionally, a pilot project is not the same as launching a framework of interoperability between card schemes.

The considerations listed below aim to help shape future discussions and design of a possible pilot project. They don't offer a blueprint, but rather a list of aspects which would need to be thought through carefully before launching such a project. Unlike Parts I and II, this section is presented as considerations rather than recommendations, since a pilot project would depend on choices still to be made about its scale, design and governance. The below considerations follow the likely steps of a pilot project:

- Defining the purpose and scope
- Identifying willing schemes and participants
- Designing the operational aspects
- How to evaluate the results and what might come next

While the legal feasibility study confirms that interconnection could be possible under EU rules, actually making that happen, especially in the context of a pilot project, depends on many moving parts. These considerations are offered as a practical tool for anyone interested in exploring that step further, whether that would be national authorities, social partners or the European Commission. EFBWW and FIEC also underline that their own institutional and financial capacities are limited and that they cannot lead large-scale operational tasks on their own. The organisations' involvement therefore must be shaped by what is feasible, with continued and increased support from the European Commission to ensure resourcing and alignment with EU initiatives such as ESSPASS and the EUDI Wallet.

Define the purpose, duration and scope of the pilot

The pilot project should begin with a clear understanding of what it is trying to achieve and who it is for. Is the objective to test whether interoperability between different card systems is technically possible? Or is it to demonstrate the benefits and drawbacks of interconnection in real-world conditions? The objective may address both questions. Similarly, the pilot project could also aim to identify practical, legal or technical obstacles and to understand how key actors such as site managers, labour inspectors, contractors and workers interact with the system.

Additionally, the legal and technical feasibility studies have identified several options to develop interoperability between the social ID cards. It is therefore key to choose the best option for the purpose and scope of the pilot project. The different options could have different implications. This is key to define the chosen option at an early stage.

Once the purpose is defined, the scope should be tailored accordingly.

The following elements should be considered:

- Which features of the cards will be tested, such as identity verification, PDA1 access, OSH training records or site entry
- Whether the pilot project will focus on a single function or cover multiple aspects
- The type of construction sites selected, for example infrastructure projects, public building projects, private housing or renovation work
- The number of workers involved and their professional roles
- Whether self-employed workers will be included in the pilot
- The countries or regions participating and the number of cross-border workers
- The level of detail to be tested, including technical compatibility, operational processes and legal compliance
- The role of labour inspections in the pilot and what types of checks will be carried out

A well-defined purpose and scope will help keep the pilot project focused and make it easier to evaluate the results. The duration of the pilot project should be defined at an early stage.

Where possible, the pilot should seek complementarity with ongoing EU initiatives such as ESSPASS, EUDI and the Interoperable Europe Act.

Consideration 2

Determine the type of pilot project

Depending on the desired scope and purpose, the “type” of pilot project must be determined. It may simply aim to show that a card from one country can be used on a site in another country, including checks by site managers or labour inspectors. Or it may take a more cautious approach with tests in a controlled setting without using them on a real site.

Different types of pilot projects could include:

- **A real-use case:** A full test where a worker’s national card is used on a construction site in another country. This would show how well the systems work in practice but would require strong legal and institutional support.
- **Simulation:** A pilot project run in a controlled environment, where the card is not used on a real site but it is tested behind the scenes. This is useful for checking technical or legal problems before moving to an on-site test.
- **National or regional pilot project:** A test within one country only, for example between national and regional card schemes to explore how well systems can work together.

The choice of type of project depends on what we want to learn/achieve and on the willingness of the concerned stakeholders to take part in it. The more ambitious the pilot the deeper the insights that can be made, however, complexity for the set up would increase.

Consideration 3

Identify suitable card schemes

The card schemes involved in the pilot project will depend heavily on the purpose and scope of the project. Some schemes might be technically advanced but difficult to include because of legal or political barriers. Others might be easier to work with but have more limited functionality. Likewise, an important factor is whether the scheme can legally be implemented in a cross-border test. The legal feasibility study shows that in some cases, using a card across borders would require changes to national law or international agreements. If that is not realistic, those schemes may not be suitable for the pilot project.

Schemes that are run on a voluntary basis, without being based on national legislation, may be easier to involve. These schemes are often more flexible and might not need legal changes to allow things like data sharing or worker consent. Another key factor is the level of support and interest from the schemes’ organisers.

Consideration 4

Role of EFBWW and FIEC in the pilot project

The SIDE-CIC project is a joint FIEC and EFBWW project. Therefore, in any case, both organisations should continue to be involved and follow closely a potential pilot project. Their role in the pilot project will depend on how the project is designed and which countries or authorities are involved. In some cases, they may be asked to support the coordination and governance of the project. In others, they may take on a more limited role, such as providing input or acting as observers.

The two organisations have limited institutional capacity and may not be able to lead or manage large-scale operational tasks. Their involvement should be shaped by what is feasible and appropriate given the structure of the pilot project. For example, if the pilot project is led by national authorities or card providers, FIEC and EFBWW could contribute through technical input, stakeholder coordination or by supporting communication between partners.

Consideration 5

Financial, logistical and institutional support

A pilot project cannot go ahead without adequate resources. This includes funding for technical development, staffing, coordination, translation and interpretation, data protection measures and possibly hardware for on-site use. The costs will vary depending on the type and scale of the pilot project but should be clearly estimated in advance. Beyond financial support, the project will need logistical and administrative coordination. This includes general management, organising meetings, trainings, providing technical support to sites and ensuring that all participants are clear on their roles and responsibilities.

Institutional support is just as important. The pilot project will only work if the relevant authorities, enforcement bodies and card providers are willing and able to participate. Depending on the design of the project, support may also be needed from the European Commission or other EU-level bodies. Continued and increased support from the Commission will be fundamental to making such a pilot project possible. Critically, any such effort would need continued and increased support from the Commission to ensure that any future pilot can be properly resourced and aligned with future developments at EU level, including in the context of ESSPASS and the EUDI Wallet.

Consideration 6

Assess readiness and select willing project participants and stakeholders

The success of the pilot will depend on involving the right participants and ensuring that they are technically and legally ready to take part. This includes national or regional authorities, labour inspectorates, card scheme operators, enforcement bodies, contractors, site managers, project owners and social partners.

For national or regional authorities, participation may require changes to procedures or clarifications of legal responsibilities, especially concerning data access and cross-border cooperation. Labour inspectorates will need to know whether they can legally access or verify information from another country's card system and, for some Member States, participation may only be possible if the legal framework allows for it.

Such participation must be voluntary and based on a clear understanding of what is expected. Stakeholders should only be included if they are committed to the objectives of the pilot and prepared to allocate the necessary time and resources, including adapting internal procedures, taking part in meetings or training sessions and sharing relevant data within the agreed scope.

OPERATIONAL DESIGN AND IMPLEMENTATION

The following considerations outline key elements for operational design and implementation for carrying out a successful pilot project on the interoperability of social ID card schemes. They focus on site selection, coordination, data handling and the governance.

Consideration 7

Select construction projects involving posted workers

Pilot activities should be implemented on actual construction sites involving posted workers. Sites with a high number of posted workers would be particularly relevant to test administrative coordination and site-level enforcement. However, the selection of sites and the way the pilot is organised will depend on which type of pilot is chosen. A full-scale, real-world pilot, for example, would require the cooperation of contractors, subcontractors, labour inspectorates and responsible authorities. A simulation-based pilot, on the other hand, might instead use sample data to test technical interoperability without needing to disrupt ongoing projects and inspections.

Consideration 8

Define processes and responsibilities

The processes need to be clear and agreed to ahead of the pilot project so that everyone involved knows what to do, when and how. These processes will depend on which schemes are participating and what functions are being tested. The following issues may need to be addressed:

What information can be accessed and by whom (e.g. site managers, inspectors, contractors) and how missing required data on the workers can be acquired

- How data is displayed and in what language(s)
- What happens if the card cannot be read or the data cannot be accessed as expected
- What support is provided to users on site (e.g. technical help or guidance)
- How suspected problems or irregularities are reported and followed up

These steps should be tested in practice during the pilot project. The more clearly they are defined in advance, the easier it will be to measure what works and what needs to be improved.

Consideration 9

Consent mechanisms

If the pilot project involves accessing or sharing personal data across borders, worker consent will need to be properly managed. Consent must comply with GDPR. Several issues will need to be considered:

- How and when consent is collected (e.g. during card registration, at site entry or through a separate process)
- What specific data the worker is consenting to share and with whom, when using their social ID card in another Member State
- How workers can withdraw consent and what happens to their data if they do
- How consent is acquired and whether this would be recognised in different national legal systems

Consideration 10

Cooperation agreements and governance model

Depending on the option chosen for the pilot project, cooperation agreements might need to be signed by the parties involved. Agreements between participating parties should define roles, responsibilities, data access and oversight mechanisms. Where relevant, these could mirror the cooperation frameworks provided in the Interoperable Europe Act (Regulation 2024/903; Articles 10-13).

In addition, the technical feasibility study highlighted that a pilot could draw from existing data space initiatives (for example, GAIA-X), where governance rules are set by participants collectively. Such a model could help ensure secure data exchange between different card schemes and authorities.

Consideration 11

Pilot project coordination team

A pilot project coordination team should be appointed to oversee daily management, monitor progress and act as a central contact point for all stakeholders. The team should include representatives of participating authorities and be supported by EFBWW and FIEC as the recognised social partners for construction at EU level.

MONITORING AND EVALUATION

Any pilot project must also consider its monitoring and evaluation to ensure that activities deliver meaningful results. The following considerations focus on how to track usability, detect problems and gather structured feedback. They also highlight the need for clear evaluation criteria and a transparent follow-up process to assess the pilot's outcomes and inform next steps.

Consideration 12

Select construction projects involving posted workers

Problems and inefficiencies must be actively monitored and addressed. This includes identifying technical problems, delays and any confusion experienced by users (e.g. inspectors, workers, site managers etc.). The monitoring process should look at:

- Technical problems, such as cards not being recognised or databases failing to connect across borders;
- Administrative burdens or unclear procedures for users;
- How easy or difficult it is for workers to present their card and for site managers or inspectors to scan and check the data;
- How long it takes to verify a worker compared to existing methods;
- Training needs of staff in order to use the system;
- What happens when the card doesn't work or the data is incorrect or incomplete.

A reporting system should be put in place during the pilot project, so participants can easily flag issues and suggest improvements. This could include user surveys or feedback sessions.

Feedback from the different parties (companies, labour inspectorates, workers, social partners, cards managers, ...) involved should be collected at several stages.

Consideration 13

Evaluation, feedback and follow-up

Clear criteria should be established to assess whether the pilot project is successful. These may include ease of implementation, level of stakeholder satisfaction, reductions in administrative burden or improvements in data reliability and enforcement. Feedback should be systematically collected from employers, workers, labour inspectors and site managers as part of this process.

An evaluation report should be prepared at the end of the pilot project and be available to the public at the latest 1 year after its completion. The evaluation should address both the successes and the challenges of the pilot project and examine options for the future, including the feasibility of extending the scope or making the system permanent.

