Mapping Report of Social ID Cards
in the Construction Sector across
the European Economic Area

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

ABSTRACT

This study explores the use of social ID cards to enforce labour, social security and tax legislation, enhance transparency and promote fair labour mobility in the construction sector. The initial phase of this project, implemented by AEIP with support from CNCE, maps the current state of social ID cards across 16 countries in the European Economic Area. This study covers 18 social ID card schemes, detailing their legal foundations, issuance processes and multifaceted roles in addressing challenges such as undeclared work, subcontracting complexities and occupational safety. The findings underscore the importance of maintaining national schemes' unique characteristics while promoting interoperability and leveraging digital advancements for efficient labour management and compliance. This report sets the stage for further exploration of interoperability frameworks and the development of sectoral social ID cards as part of the "Social Identity Cards in Construction" (SIDE-CIC) project, co-funded by the European Commission and coordinated by FIEC and EFBWW.

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Introduction

This report, drafted by the European Association of Paritarian Institutions (AEIP) with support from its Italian member, the *Commissione Nazionale Paritetica per le Casse Edili* (CNCE), provides a comprehensive mapping of the current situation regarding social identity cards in the construction sector across the European Economic Area (EEA). It explores the role of these cards in enforcing labour, social security and tax legislation, enhancing transparency and promoting fair labour mobility within the construction sector. The report examines the policy logic for the adoption of these tools in various Member States, their legal foundations and their technical functioning, with a particular focus on data management.

The "Social Identity Cards in Construction" (SIDE-CIC) project, co-funded by the European Commission under the Social Dialogue Programme, is coordinated by the European Construction Industry Federation (FIEC) and the European Federation of Building and Woodworkers (EFBWW). Both organisations have actively contributed to this report, along with their affiliates, who provided essential information used in the mapping. This project examines social ID cards in the construction sector as a tool to enforce EU rules, create a more transparent environment for workers, employers and labour authorities, as well as to foster fairer labour mobility within the sector.

This initiative has emerged in response to the increasing development of sectoral social ID card schemes across Europe at national, regional and local levels. These schemes, each with distinct characteristics, are designed to address specific sectoral challenges such as the complexity of subcontracting, undeclared work and the growing mobility of workers within the construction industry.

The report builds on a previous EU-funded project carried out in 2015 by FIEC and EFBWW, which mapped social ID card schemes in 13 EU countries. The 2015 project provides a basis for this current mapping by identifying key trends and challenges that persist today. This updated mapping reflects recent political developments, changes in the construction workforce and the increasing use of digitalisation and technology to enhance transparency on construction sites. The evolution of these schemes across Europe demonstrates the growing role of social ID cards in addressing sector-specific issues.

This report includes 18 country reports, offering detailed insights into the use and experiences of social ID cards across the EEA. The comprehensive mapping presented here serves as a foundation for the next stage of the SIDE-CIC project, which will explore the feasibility of interoperability between national

schemes and contribute to the development of a potential framework for social ID cards in the construction sector across the EEA.

OBJECTIVE OF THE REPORT

The aim of this report is to assess the landscape of social identity cards within the European Economic Area, with a specific focus on the construction sector. It offers a comprehensive overview, focusing on features and contents of the social ID card schemes, as well as on their legal and technical aspects. This is meant to provide adequate knowledge for the following activities of the project, which aim to assess how national schemes can be made interoperable at EU level and to pinpoint possible technical obstacles and regulatory shortcomings within the EU framework, thus contributing to a clearer understanding of the sector's needs. It is important to clarify that the report and the project departs from considerations on the distinct characteristics and specificities of the different national social ID cards, already evident in the 2015 report and therefore do not consider the option to introduce a single standardised system.

METHODOLOGY

To carry out this study, a combination of primary and secondary sources was used. The process began by defining and distributing a survey among affiliated members of FIEC and EFBWW, representing national social partners in the construction sector, as well as sectoral paritarian funds that are members of AEIP. In several countries, these paritarian funds are tasked with issuing and managing social ID cards on behalf of the social partners.

The survey enabled the collection of initial data on existing social ID card schemes. Following this, additional information was gathered through semi-structured interviews with key stakeholders. These interviews primarily involved national social partners and, where relevant, third-party institutions such as paritarian organisations and national authorities, including ministries of labour and labour inspectorates.

The interviews were particularly helpful in providing access to secondary sources at the national level, including relevant legislation, collective agreements, specialised studies and impact assessments. Further, desk research was conducted to gather further existing information on social ID cards in the construction sector, drawing from reports, case studies, best practice examples and statistical data. A key reference for the analysis was the 2015 report *'Social Identity Cards*

in the European Construction Industry' (Buelen, 2015), which served as a foundation for assessing developments in the sector over the past decade.

To ensure the accuracy and reliability of the findings, information and data from each country report were cross-referenced with official sources. Additionally, draft versions of the country reports were shared with the respective stakeholders interviewed during the research process for feedback and clarification. This collaborative approach helped verify the findings and ensured the final content reflected the most accurate and relevant data available.

DEFINITIONS

Definition of a social ID card

A social ID card for the purposes of this project is a physical or digital tool designed to verify the identity of workers and employers, helping to enforce labour, social security and tax legislation. The focus of this project will be on the way that these cards are used in the context of the construction sector and on construction sites. These cards typically contain essential information such as the worker's identity, employer details and, in some cases, qualifications and training certifications, including OSH compliance. Social ID cards serve multiple purposes, such as tracking worker attendance, ensuring compliance with labour regulations and promoting fair working conditions by combating undeclared work, social dumping and other illegal practices. They are often issued by national authorities, social partners or paritarian institutions and can be compulsory or voluntary depending on the context of each country.

Typology of social ID cards

Social ID cards can be categorised according to different criteria. This chapter provides for an overview of the different dimensions (variables) along which cards have been analysed.

Status [in operation / under development]: indicates whether the card is already in use or if the scheme is still in development and not yet applicable in the construction sector.

Issuance [centralised / decentralised]: refers to how the scheme is managed and the card is issued. In some countries, the card can be issued by various authorities or actors, including the company itself (decentralised). In others, only a central (national) authority or designated actor is responsible for issuing the cards (centralised).

Issuing authority: identifies the relevant organisation responsible for issuing and managing the card.

Main stakeholders involved: refers to the key actors, other than the issuing authority, that participate in the scheme's management and issuance of the cards.

Validity: specifies whether a card has a limited or unlimited period of validity. If limited, it could be based on the employment contract, the worker's status, the relationship with the employer or a pre-defined expiry period, as detailed in the country reports.

Participation [compulsory / voluntary]: social ID cards can be either compulsory or voluntary. Cards are usually compulsory when mandated by legislation, particularly concerning labour, occupational safety and health (OSH) or tax regulations. Participation is also considered compulsory if imposed by collective agreements that apply to most or all companies in the sector, possibly extended by law. A card is considered voluntary if its use is decided by the worker, company or client; or if it is required only for specific sites or companies, often in the context of public procurement. Details on legal aspects and requirements for each country are provided in the country reports.

Costs [employer / paritarian institutions / social partners / individual]: identifies who is responsible for covering the costs of the scheme.

Applied to posted workers [yes / no]: specifies whether the card applies to posted workers.

Sector: indicates the sectoral scope of the card. Although this study focuses on the construction sector, some cards have a broader application across different sectors.

Objective: the objectives of the card, identified from the questionnaire, include: combating undeclared work; controlling access to construction sites; providing evidence of training and work experience; identifying workers and employers on construction sites; improving compliance with and evidence of health and safety training; and other objectives.

Data accessibility [visual / QR code / digital]: this refers to the method by which relevant stakeholders (i.e. employers, government agencies, labour inspectorates) may access and retrieve information. 'Visual' refers to whether all or some covered information is readable directly on the physical card. QR code refers to whether access is mediated by a token embedded in the card (usually a QR code), for accessing information with a reader when scanned. Sometimes it can be re-

placed by a barcode. 'Digital' refers to data accessible through an online platform, requiring details such as the cardholder's name or number and/or authentication of the person/organisation accessing data.

Data storage [yes / no]: specifies whether the card securely stores and manages information, often with an electronic chip. It involves keeping digital or physical records that contain details about workers, such as personal information, job roles, certifications and employment history, depending on the card's features.

STRUCTURE OF THE MAPPING REPORT AND OF COUNTRY REPORTS

The mapping report is mainly composed by a series of country reports referring to countries where one or more social ID card schemes have been identified. Country reports are followed by a short comparative analysis which provides an overview of the main findings of the mapping.

Structure of country reports

Card overview: this section provides an at-a-glance description of the tool, quickly identifying key characteristics such as the name of the card, operational status (whether it is in operation or under development), issuing authority, main stakeholders involved in the management thereof, validity, compulsory or voluntary status, sector addressed and scope of the card.

Purpose: this section delves into the purpose of the social ID card within the context of the national landscape and the specific requirements of the sector.

Background: this section aims to provide a broad overview of the social ID card, outlining its background and/or rationale.

- **Context:** this sub paragraph aims to report the historical context and/or the main reason that brought to the creation of a social ID card scheme.

- **Future goals:** this section reports discussions or plans to extend the features or scope of a social ID card scheme in the near future.

- **Trials and pilots:** this section describes pilot projects and trials that a social ID card scheme has undergone.

Legal aspects: this section examines the validity and legal foundation of the social ID card.

- **Legal basis:** it explains the legal framework governing the card's use detailing sources as in legislation or in collective agreements whenever in place.

- **Scope of application and participation:** it describes which categories of works or sectors and which categories of workers are subject to a social ID card scheme and if the use of the card is voluntary or compulsory.

- **Validity:** it reports the period of validity of the card.

- **Data protection and compliance:** this section highlights key information on how the social ID card scheme addresses GDPR rules, like legal basis for data processing and particular aspects of privacy policies, like how long data can be stored in the card's database.

- **Other relevant information:** e.g. details on enforcement, penalties for misuse, the price of the card, if particularly relevant…

Technical aspects: this section focuses on technical aspects that characterise the functioning of the social ID card. This includes implementation of anti-fraud measures, access to data and the integration of the social ID card with other databases, exploring the modalities of involvement of stakeholders, whenever the management of the scheme requires cooperation of different organisations.

- **Card issuance and data management:** this paragraph provides information on the issuing authority and issuing procedures as well as on data management.

- **Available data:** it describes the information displayed on the card or stored in the database.

- **Data accessibility:** it scrutinises how stored data can be accessed by different categories of users.

- **Interoperability:** this paragraph reports whether the card is interconnected with national social security systems and at cross-border level.

- **Anti-fraud measures:** description of anti-fraud measures present on the card.

- **Other relevant information.**

Concluding remarks: this section scrutinises the effectiveness of the social ID card and possible perception of social partners. It delves into whether the card is yielding tangible results and examines any available impact assessments or data regarding its usage.

Country reports

AUSTRIA

Overview

- **Name of the card:** BauID card
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** BauID GmbH
- **Main stakeholders involved:** *BUAK Bauarbeiter-Urlaubs- und Abfertigungskasse, Gewerkschaft Bau-Holz*, the Federal Guilds of the Construction Ancillary Trades, the Federal Guild of Construction and the Association of the Construction Industry within the Austrian Economic Chamber
- **Validity:** 5 years
- **Participation:** Voluntary
- **Costs:** Employer or individual
- **Applied to posted workers:** Yes
- **Sector:** Construction and other sectors indicated in the law
- **Objective:** To identify workers and employers on the construction site; to combat undeclared work.
- **Data accessibility:** QR code and digital
- **Data storage:** Yes

Purpose

The purpose of the BauID card is to identify employers and employees at construction sites, ensuring compliance and facilitating inspections by construction managers and authorities on construction sites to combat undeclared work and social dumping.

Background

Context: The BauID card is a voluntary tool introduced nationally in Austria in 2023, following an amendment to the Austrian law governing holiday pay and severance pay for construction workers (*Bauarbeiter-Urlaubs- und Abfertigungsgesetz, BUAG*).

The initiative for the card was spearheaded by *Gewerkschaft Bau-Holz*, the Federal Guilds of the Construction Ancillary Trades, the Federal Guild of Construction and the Association of the Construction Industry within the Austrian Economic Chamber.

In Austria, alongside the BauID, there exists an employer-driven card known as ISHAP, which is designed to assist general contractors in the construction industry in combating social fraud, aligning with the broader objectives of the BauID.

Legal aspects

Legal basis: The BauID card is anchored in Austrian law under BUAG Act, Section VIc: §§ 34–34d (*Bauarbeiter-Urlaubs- und Abfertigungsgesetz*), outlining responsibilities and data security measures. This legislation also designates the company responsible for issuing and managing the card, which is a subsidiary of BUAK, known as Bau ID GmbH. According to the law, employees are required to enter into a contract with BauID GmbH, committing to participate in the BauID system.

Scope of application and participation: The BauID is a voluntary card available to any company in the construction sector. It applies to all employed workers active on the construction site where it is adopted, including posted workers, but does not extend to self-employed workers. If the main contractor implements the card, it becomes mandatory for subcontractors as well.

Validity: The BauID card is valid for 5 years and is linked to the individual worker.

Data protection and compliance: The BauID is compliant with EU GDPR rules.

Other relevant information: The costs of the card are covered by the employer or employee. The Initial Issuance Fee is €45 (excl. VAT) for digital legitimisation, with a Monthly Service Fee ranging between €2 and €4.50 based on the pricing model. Postal legitimisation incurs additional costs of €65 (excl. VAT). Quick card issuance incurs an extra charge for immediate availability and limited use. These fees support operational functionality and system maintenance.

Technical aspects

Card issuance and data management: The BauID card is issued by BauID GmbH, a subsidiary of BUAK (Construction Workers, Holiday and Severance Pay Fund) Austria. The card is printed by an external provider. Participation in the BauID system is voluntary for both employers and employees.

All data concerning individuals or businesses registered with BauID GmbH is stored in BUAK's data centres. This includes employee registration details, employer information, specifics of assignments for posted and hired-out workers, documentation related to permits for foreign employees and the status of employment relationships. BUAK serves as the server provider and does not have direct access to the data.

BauID GmbH implements permanent technical and organisational measures to securely store specific documents for regulated access. Additional documents related to workers and project information can be digitally stored in the card database upon specific requests.

Available data: The card contains details like the name, card number, production date and validity dates, alongside a 3D barcode and card number. Additionally, it features a QR code, hologram and an NFC chip.

Data accessibility: The BauID card itself does not store any data but serves as an identifier that can be scanned using NFC technology, a QR code or by entering the card number online. Access to the card's database is limited to financial police, BUAK inspectors and employers.

Registration of an employee's card at a construction site involves scanning the BauID card. Inspections can be conducted by BUAK inspectors, financial police and companies, with access restricted to their own employees or subcontractors.

When the card is scanned, it retrieves crucial information from various interfaces: the Austrian Health Insurance (ÖGK) verifies registration status and grading, BUAK confirms registration status, part-time employment details and work location, the Employment Service Austria (AMS) provides updates on work permit issuance and local scope, the Central Coordination Office supplies posting notification specifics and the Austrian Business Licence Information System (GISA) contains employer information.

Interoperability: The BUAK database is interconnected with both the social insurance database and the labour market service, which acts as the authority responsible for issuing work permits in Austria.

Anti-fraud measures: The BauID features a hologram and elevated shapes against counterfeits. It is a certified card, which includes a unique, non-duplicable number embedded in the NFC chip, bolstering data security. Identity verification is conducted via a smartphone app, employing artificial intelligence and biometric recognition of the worker for rapid validation.

Other relevant information: Workers can upload personal data such as training certificates using the BauID Info app.

Concluding remarks

Both national social partners participated actively in the creation of the BauID and recognise its value in ensuring legal employment, combating social dumping and maintaining good working conditions. We can however highlight that concerns have been raised about how to keep data updated consistently and efficiently.

While there is currently no impact assessment study reporting on the BauID's effectiveness, national social partners in the construction sector and authorities have created a tailored and versatile solution, with the potential for broader implementation in the future.

BELGIUM
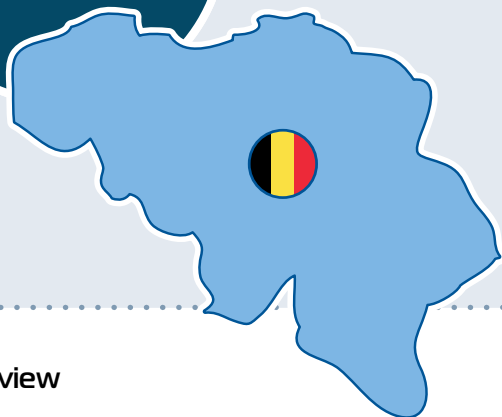
Overview

- **Name of the card:** ConstruBadge
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** fbz-fse Constructiv
- **Main stakeholders involved:** fbz-fse Constructiv, Social partners of the Belgian Construction Industry
- **Validity:** 1 year
- **Participation:** Voluntary
- **Costs:** Employers
- **Applied to posted workers:** Yes
- **Sector:** Construction
- **Objective:** To identify workers and employers on the construction site; to combat undeclared work
- **Data accessibility:** Visual and digital
- **Data storage:** No

Purpose

The ConstruBadge is a visual ID tool for construction workers used to combat social fraud, especially on multi-employer worksites. Belgian social partners are expanding its scope (primarily using a chip in the card), including information on training, safety certificates, driving license, access control, presence registration, etc. The goal is to make it mandatory for everyone accessing and working on a construction work site.

Background

Context: Introduced on 1 October 2014 by social partners, ConstruBadge has evolved from earlier initiatives to address undeclared work and social fraud in the construction sector. Previous experiments were conducted by social partners in cooperation with the National Office of Social Security (NOSS) from 1990 to 1998. These included an ID card for social fraud (1990–1994) and a social ID card type A (1995–1998). In 1999, the Nominative Unemployment Benefit Card C 3.2 A was created with the National Office of Unemployment.

Future goals: Belgian social partners are currently working to make more worker-related information available, such as health and safety certification, training and work experience. Likewise, there is a plan to link the card to applications to provide access to sites.

The card may also contain information on the unique identification number of the badge to allow companies to register presence on the worksite and keep track of worktime. Additionally, social partners intend to connect the card to a database.

Legal aspects

Legal basis: The ConstruBadge is regulated by a collective labour agreement (11/09/2014, N°: 123591/CO/124). Chapter 4 of the collective agreement establishes its entry into force on 1 October 2014. Chapter 2 of the collective agreement indicates the paritarian fund fbz-fse Constructiv as issuer of ConstruBadge.

Scope of application and participation: The ConstruBadge applies to construction companies and their workers, as well as to temporary agencies for the workers they assign to construction companies (Chapter 1 of the collective agreement). The scheme also applies to foreign employers and to posted workers when falling within the competence of Constructiv.

This means while the card is mandatory for companies applying the collective agreement, it remains voluntary for others. Nevertheless, social partners are pushing for national legislation to make it mandatory for all.

Validity: The card is valid for one year. Every year, around December, fbz-fse Constructiv produces an updated list of Belgian workers active in the construction sector.

Data protection and compliance: The scheme is compliant with GDPR.

Other relevant information: The production and the issuance of the ConstruBadge costs €20 per badge, paid by the employer (Chapter 3 of the collective agreement). This cost applies also to foreign employers (plus post).

Technical aspects

Card issuance and data management: fbz-fse Constructiv automatically issues cards based on the data communicated by the employer to Belgian social security (Dimona/DmfA/Limosa). To issue the ConstruBadge annually (at the beginning of the year), fbz-fse Constructiv compiles an updated list of Belgian workers active in the construction sector each December. Fbz-fse Constructiv sends the card directly to the registered address of the workers of Belgian construction companies and of temporary workers employed in construction.

In Belgium organisations involved in the social security system, including fbz-fse Constructiv, share data through the Crossroads Bank of Social Security (owned by the Belgian Federal Public Service Economy).

Each organisation authenticates the data that they provide to the Crossroads bank and can share this data with other partner organisations in the Crossroads bank to the extent that is necessary. Employers must submit all relevant information about their workers to public authorities every quarter, e.g. declaration on every worker, indicating how many days of employment, unemployment, sick leave, etc.

This updated list is then used by Fbz-fse Constructiv to issue the card to every active Belgian worker at the beginning of the year. If a worker joins the sector during the ongoing year Constructive receives the update and issues the badge. Fbz-fse Constructiv sends the ConstruBadge directly to the home address of workers at Belgian construction companies and of temporary workers employed in construction by recognised temporary work agencies. Employees who are registered in the company as clerks (administrative role) do not receive a ConstruBadge.

For posted workers, there is a specific procedure that foreign companies must follow. Foreign companies need to register their workers posted to Belgium in the LIMOSA database. Constructiv receives this information by national authority and can keep track of posted workers in Belgium and issue the ConstruBadge accordingly. After payment of the cost price, the ConstruBadge will be sent to the address in Belgium provided by the foreign employer.

The card is produced by a specific company specialised in producing cards and badges.

Available data: The card displays essential information about the worker, including a photo, name, surname, Belgian national number, as well as details about the employer (name and Belgian company number). It also shows the validity period. The card has a barcode and a chip which still do not have a precise aim but will allow a broader use of the card in the future.

Data accessibility: Inspected visually by employers and authorities to track workers on-site.

Interoperability: While not directly connected to the Belgian social security database, inspectors can verify workers' and employers' details with their respective identification numbers.

Anti-fraud measures: The chip includes an RFID-antenna and logos to prevent counterfeiting.

Concluding remarks

Social partners continue efforts to make the ConstruBadge scheme mandatory, as the current collective agreement does not apply to all workers, particularly white-collar workers. The Fair Competition Plan, signed in February 2024, aims to improve the frameworks, combat social fraud and enforce the use of identification tools like the ConstruBadge across all sites.

CYPRUS

Overview

- **Name of the card:** Tool under development
- **Status:** Tool under development
- **Issuance:** Centralised
- **Issuing authority:** Ministry of Labour and Social Insurance of Cyprus
- **Main stakeholders involved:** Trade unions and employers
- **Validity:** Tool under development
- **Participation:** Compulsory
- **Costs supported by:** N/A
- **Applied to posted workers:** Yes
- **Sector:** Construction sector
- **Objective:** To combat undeclared work; to identify workers and employers on site
- **Data accessibility:** Visual data accessibility for the paper document, QR Code for the ERGANI and not defined for the card yet.
- **Data storage:** Tool under development

ID

under development
(no photo available)

Purpose

Combating undeclared and illegal work in the construction sector is a major challenge in Cyprus. The tools under development aim to monitor and reduce such practices effectively, with specific focus on high-risk sectors like construction.

Background

Context: In 2009, Cyprus introduced measures to combat undeclared work, particularly in construction, catering and cleaning. The Ministry of Labour and Social Insurance enhanced inspections and introduced a paper-based tracking system on construction sites. Inspections revealed that undeclared work in the construction sector involved one out of every two EU citizens. A first measure requires workers to fill out a paper form upon entering the work site, providing their name, surname and ID card details. This system tracks the number and identity of workers without requiring them to present an ID card each time. Employees must write their name and surname on this form both when entering and exiting the construction site.

A second tool is the Greek electronic app ERGANI (refer to box 1 below), which mandates employers to register their employees at the start of work contracts. The Cypriot government has acquired the license for this application.

Trials and pilots: An ID card scheme tailored to the construction sector is under development, modelled after Greece's system. Discussions among social partners, where 50% of workers are represented by trade unions, have centred on measures to combat undeclared work, including the introduction of this ID card. The Ministry is actively collaborating with social partners from Lithuania, Belgium and Greece, along with the European Labour Authority (ELA), to refine and ensure the card's efficacy. With the collective agreement expired in 2023, efforts are underway to renew it.

Regarding the illegal employment of third-country nationals, the government has partnered with the asylum seekers agency to track those rejected but still working in Cyprus. This initiative has led to increased awareness among employers, resulting in instances where individuals have fled worksites during inspections. Proposed stricter enforcement measures include the introduction of a social ID card equipped with an electronic chip.

Legal aspects

Legal basis: The paper form system was introduced in 2009 through a decision on public contracts from the Ministry, mandating employers to maintain a daily list of workers present on-site.

The use of the ERGANI app is based on the Law on employees in the construction Industry Act 2020. With this tool, employers can simplify tasks by electronically registering each employee as soon as they start work. In Cyprus, building sites are required to maintain an employee register that is accessible to inspectors.

The card under development for the construction sector is based on the collective agreement between recognised trade unions and employers' organisations. This agreement originally from 2013, requires amendment. Social partners are discussing the introduction of an ID card for construction workers as part of a new agreement. The new agreement will empower the paritarian *Provident Fund* for construction workers in Cyprus to manage and finance the card through contributions from employers' organisations and trade unions, who oversee the fund.

Scope of application and participation: All persons entering or leaving construction sites are obliged to register their name on a paper register, available for inspection. ERGANI registration applies only to employees in the relevant sectors, including temporary agency workers and posted workers but excluding interns and top-level managers (who are not bound to a specific working time schedule). It is important to note that registration on the platform requires a Cypriot tax code, not necessary for posted workers.

Data protection and compliance: The paper form contains only worker's name and surname, while the ERGANI system is GDPR compliant.

Other relevant information: If the employer fails to maintain this registry or keep track of workers present on the construction site via ERGANI, they are fined €250 for each unregistered worker.

Technical aspects

Card issuance and data management: The paper form is provided by the construction company, while the ERGANI application is managed under a bilateral agreement between Cyprus and Greece.

Available data: While the paper form only requires the worker's name and surname to track the number and identity of workers, the ERGANI system records comprehensive information on employment information, including: official employer declarations about the beginning, modification and termination of employment, work schedules and declarations on working time and pay necessary for social security purposes (Analytical Periodic Declarations).

Data accessibility: The paper form is available at the entrances and exits of sites, requiring all workers to register their names when they arrive and leave each shift. This registry is checked by labour inspectors and compared against the workers' IDs and the company's relevant documentation.

ERGANI simplifies these checks via QR code scanning and providing attendance data to employers and employees via the application. Labour inspectors can access real-time data through the ERGANI platform, enabling them to cross-check employment and social security information. This process allows inspectors to track and report information to the Ministry, such as work hours, overtime, holidays and employee salaries and benefits.

Concluding remarks

Through the adoption of these measures, Cyprus has reduced the number of undeclared workers to 10% (from 30% in 2009). However, the Ministry of Labour and Social Insurance now faces the challenge of third country nationals working without valid permits. This issue involves individuals who entered Cyprus as asylum seekers but remained in the country after their applications were rejected. In 2024, the ministry discovered that more than three hundred illegal residents were still illegally employed in the construction sector. As a result, many contracts were terminated. During inspections, it was noted that many workers fled the site without showing their ERGANI QR codes or signing the paper form.

The government has identified the social ID card under development as a tool to further tackle undeclared work in the country. The Ministry of Labour and Social Insurance is collaborating with social partners from EU member states that have already implemented similar tools and with the European Labour Authority to ensure effective implementation.

Box 1

Ergani Digital Labour card

In Greece, the Ergani Digital labour card is meant to tackle undeclared work and to promote fair competition. This tool improves transparency on presences and working time of employees, simplifies inspections and is meant to guarantee the declaration of actual working time and the payment of overtime.

The ERGANI II platform, embedding the new digital card function, entered into force in July 2022.

ERGANI Digital Labour Card is a dematerialised card showing a personal QR Code. Workers shall request it online, via browser or downloading the dedicated app ('myERGANI'), upon authentication via their Taxisnet credentials. In alternative, employers shall print it for each of their employees via the ERGANI platform and hand them their QR codes. The card tracks information on working time for the employee. Additional data on the employee and of the employer are available via interconnection with other systems and vary significantly depending on the user.

The card was initially mandatory as a pilot in banks and in supermarkets with more than 250 employees. Between February and March 2023, the scope was extended to private insurance firms, security companies and to companies partially or fully owned by public bodies. In January 2024, the obligation to track working time via the system has been extended to manufacturing and to retail companies not initially covered.

It concerns employees only, including temporary agency workers but excluding interns, top level managers (not to bound to specific working time schedule) and posted workers. The tool is available free of charge for employers and workers.

Data are available in real time to the employers (in the shape of a calendar filled with attendances) and to employees (in the 'myERGANI' app, together with other information on their current and previous employment records).

The Labour Inspectorate can also access data in real time via the ERGANI II platform, therefore being able to match and crosscheck them with other employment and social security data regarding the same company/employee.

Following an agreement between the Greek and Cypriot government, operative since 2023, the latter has imported the technology adopted for ERGANI for developing a similar system

Country reports

DENMARK

Overview

- **Name of the card:** Copenhagen ID-Card project
- **Status:** In operation
- **Issuance:** Decentralised
- **Issuing authority:** Construction company
- **Main stakeholders involved:** Copenhagen Municipality, main contractors
- **Validity:** Construction project's duration
- **Participation:** Compulsory (for specific companies)
- **Costs supported by:** Copenhagen Municipality
- **Applied to posted workers:** Yes
- **Sector:** Construction
- **Objective:** To identify workers and employers on the construction site; to combat undeclared work
- **Data accessibility:** Visual, QR Code and digital
- **Data storage:** Yes

ID

København mod social dumping

Leverandør

KØBENHAVNS KOMMUNE

[NAVN]

[FAGGRUPPE]

[VIRKSOMHED]

[OPRETTET]

www.socialdumping.kk.dk

Purpose

The Copenhagen ID-Card aims to ensure fair labour conditions, tackle social dumping, provide transparency in subcontracting chains and ensuring fair wages for workers. It also supports the tracking of workers' training and qualifications.

Background

Context: Denmark does not have a mandatory identification tool for construction sites, but large construction companies issue "badges", similar to social ID cards, for worker access. In 2023, the Municipality of Copenhagen launched an initiative to develop a social ID card for major projects such as schools, hospitals and infrastructure developments (also for projects with a budget higher than 100K DKK). Social partners have been consulted in phase of project design and participate in the project's steering group as observers.

Since 2019, the City of Copenhagen's Corporate Social Responsibility (CSR) department (internally defined as "intervention team") has led efforts to combat social dumping. After piloting the ID card scheme on select sites, the municipality decided to implement the ID-Card scheme for its largest projects, starting in 2024, with plans to extend it to 10 large contractors and 10-20 smaller ones by year-end.

Legal aspects

Legal basis: The Copenhagen ID-Card project is a political initiative rather than a legal requirement. However, labour clauses in every service contract mandate that wages adhere to the minimum levels outlined in the most representative collective agreements, particularly to prevent social dumping and underpayment of workers, especially for those coming from abroad. Foreign companies posting workers to Denmark are required to register all their activities in the RUT register (www.rut.dk), ensuring transparency and accountability in labour practices.

Education also plays a crucial role in the ID card initiative, with an education clause stipulating that work positions and wages should be commensurate with the level of training and qualifications of the workers. This ensures that workers receive fair compensation based on their skills and expertise, promoting a more equitable and supportive work environment.

Scope of application and participation: This card applies to specific construction companies working on

public buildings and infrastructure on the basis of bi-lateral contract with the municipality of Copenhagen. Since 2021, there has been a contractual requirement for the use of ID cards in all major buildings where the City of Copenhagen is the developer. The requirements for the use of ID cards are specified in two ID claus-es: the first clause obliges the supplier to ensure that all employees working on the task are correctly reg-istered in the municipality's system, while the second clause obliges the supplier to ensure that all employ-ees have a valid ID card and that they 'clock in and out' of the construction site.

Validity: The card is valid for the duration of the con-struction project, offering flexibility such as the pos-sibility to be deactivated and reactivated and its use across multiple construction sites.

Data protection and compliance: The Copenhagen ID Card is compliant with GDPR.

Other relevant information: One of the final aspects currently being defined by the Copenhagen Munici-pality pertains to the regulations concerning potential sanctions for companies and workers in cases of mis-use or absence of ID on the workplace during munici-pality inspections.

The municipality covers the cost of hardware and printing software, providing the main contractor with the necessary software for card issuance. Additionally, there's a streamlined process for replacing lost cards, ensuring minimal disruption to workflow.

Technical aspects

Card issuance and data management: The ID card is originally based on the implementation of the Norwe-gian HMSREG card and has been further developed through collaboration between the intervention team and the supplier, a private IT company. This team manages the ID card scheme in cooperation with the managers of the construction sites where the ID cards are introduced. The intervention team provides the main contractor with the necessary equipment (e.g. scanners, card printers) and the control system where information is recorded and stored. The contractor is obliged to use the system according to the intervention team's instructions.Issuance and implementation are thus carried out independently of the municipality's de-veloper's project management.

Available data: The ID card scheme in the Municipality of Copenhagen consists of three elements: (1) a soft-ware-based control system, (2) the physical ID card it-self and (3) any hardware to handle access control. In addition, the card contains a chip on which information can be stored electronically and allows the card to be used as a key card. The physical ID card shows the fol-lowing information: the employee's full name, date of birth and a photograph of the employee, as well as the employer's name and VAT number (CVR number) and an individual card number.

Data accessibility: The intervention team provides equipment, such as card scanners through which the main contractor (construction company) can scan workers' ID cards at the entrance and exit of the worksite. The control team also provides the main contractor with the control system where the information is recorded/stored. Through the control system, the intervention team has access to the in-formation recorded/generated at each site, thus also allowing them to keep track of each construction process, for example by looking at which subcontrac-tors/professional groups are working on the con-struction project at that time. They have a data base to assess where there is the greatest risk of breach of the labour clause.

The intervention team works as described, using a risk-based control model based on a number of fac-tors such as type of company, employment relation-ship, type of work done, etc. When the team consid-ers that there may be a breach of the labour clause, they take a physical inspection on the site and talk to the building management and employees. Based on the information collected, they assess whether a documentary check of one or more staff members is needed. The risk model is dynamic and is constant-ly evolving as the team builds experience and new trends emerge. In this context, the ID card scheme serves an important function, as the data it generates helps to continuously improve the data base of the model.

Interoperability: The Municipality is developing a busi-ness intelligence system where they can compare the data from the control system with other data from the municipality, for example to see whether a certain CVR number appears elsewhere in the municipality's data. The intervention team has also started to carry out checks for other nearby municipalities.

Concluding remarks

Launched in June 2024, the ID Card scheme has yet to be fully evaluated. However, a pilot project con-ducted in 2020 indicated that the ID card has signifi-cant potential for combating social dumping, improv-

ing subcontractor oversight. Although trade unions strongly support the introduction of a nationwide ID card scheme, employers' organisations have reservations regarding the compulsory introduction, citing increased costs and administrative burdens associated with such a system.

However, the Copenhagen Municipality is currently focused on a local-level scope for the card. Their strategy prioritises scaling it to nearby municipalities before considering a broader national approach.

Box 2

The experiences of badges developed by construction companies

Denmark has had several experiences of social ID card at company level for specific construction projects for worker registration on-site, primarily to monitor health and safety certifications. There is no involvement from inspectorates or trade unions. Some cards are implemented by investors, while others by main contractors. Their primary purpose is to manage site entry and ensure compliance with safety protocols. Below are two examples of such systems from Femern Link Contractors (FLC) and Exyte.

Femern Link Contractors (FLC)
FLC is responsible for constructing the Fehmarnbelt tunnel. The FLC access card is used to manage site access and track health and safety training records. It ensures security and assists in emergency situations. The card's validity is tied to the worker's contract and displays contract start and end dates. For different categories of workers, including posted workers and subcontractors, are issued distinct cards with varying validity periods. Depending on the area of work, workers may need additional safety certifications.

The card contains basic worker information and provides access to further details through a QR code, with access levels based on user roles. Data security and compliance with EU regulations, including GDPR, are ensured.

Exyte
Exyte, an international company operating in Denmark, also uses an access card system, which was not mandated by Danish law but introduced to meet client requirements. The card is used to monitor health and safety certifications and working hours, ensuring compliance with Danish regulations. The card tracks site entry and exit and workers must attend a mandatory OSH seminar to receive it.

Construction projects with the involvement of company ID cards
Below is a list of significant construction projects in Denmark where company ID cards have been implemented:

- **New hospital in Odense** (https://ouh.dk/til-samarbejdspartnere/the-new-ouh)
- **New hospital in Koge** (https://www.regionsjaelland.dk/fagfolk/planer-for-sundhed-og-sygehuse/sygehusene-2025/projekt-universitetshospital-koege)
- **Google Data Center Fredericia** (https://www.datacenters.com/google-fredericia-denmark)
- **Storstrømsbroen** (Bridge) (https://www.vejdirektoratet.dk/storstroemsbroen)

Further technical details of these systems will be explored in the feasibility study.

ESTONIA

Overview

- **Name of the card:** Unified Worker Card
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** Hansab AS
- **Main stakeholders involved:** Estonian Tax and Custom Boards
- **Validity:** No specific validity period
- **Participation:** Compulsory
- **Costs supported by:** Employer
- **Applied to posted workers:** Yes
- **Sector:** Construction sector
- **Objective:** To identify workers and employers on the construction site; to combat undeclared work
- **Data accessibility:** Digital
- **Data storage:** Yes

ID

Unified Worker Card
(no photo available)

Purpose

The Unified Worker Card aims to ensure fair competition in construction, a sector often plagued by undeclared wages and tax fraud. This card scheme helps honest companies by reducing the risk of VAT fraud and ensuring compliance with labour tax regulations. It supports authorities in monitoring foreign workers' compliance with local laws and it strengthens overall supervision of workplace conditions. Additionally, the card provides main contractor with an overview of who is present at a construction site and ensures proper registration.

Background

Context: The electronic registration system for construction workers and subcontractors was introduced as a national initiative on 1 October 2023 by the Estonian Tax and Customs Board. This system is mandatory for larger construction projects and requires contractors to register workers using Unified Worker Cards. Key stakeholders, including employers' organisations, trade unions and other industry groups, were involved in the scheme's development to address widespread undeclared work in the sector.

Legal aspects

Legal basis: The Unified Worker Card is governed by the Taxation Act and its 2022 amendments. The card scheme was introduced to improve transparency and combat tax evasion, estimated at €20 million annually in the construction industry. Contractors must register the entry and exit of workers using the card or an alternative digital device. This data helps authorities track subcontractors, verify working hours and monitor compliance with tax and labour laws.

The card applies, firstly, if a construction project lasts longer than 30 working days and involves at least 20 workers at a time or if the workload exceeds 500 mandays. Secondly, companies are required to register the construction project if works begin after October 1, 2023 or if it is already underway with an anticipated completion date of 1 October 2024.

Contractors are responsible for ensuring that all employees and subcontractors are registered in the national System for Registration of Subcontracting chain and working time (TTKI) before they start working on-site.

Scope of application and participation: The card scheme is compulsory for all personnel on a construction site,

including visitors and non-construction workers. Every individual must log their entry and exit times, ensuring a complete record of who is on-site. The only exception is for transport workers delivering materials, unless they are directly involved in construction activities. Guest cards can be used for short-term visitors.

Validity: The card does not have a specific validity period.

Data protection and compliance: The Unified Worker Card complies with GDPR regulations, ensuring that personal data is protected. Worker information—including names, identification numbers, employer details and contract durations—is securely stored and only accessible to authorised personnel. Data is transmitted securely to ensure privacy and all processes are monitored to ensure legal compliance.

Other relevant information: Employers bear the cost of issuing the card to their workers. Each card costs up to €6.67 (plus VAT) per employee. Contractors may also face monthly charges ranging from €100 to €1,000, depending on the size of the construction site and the number of workers involved. Additionally, contractors with existing digital systems may integrate them into the new card scheme. Employees can use the same card across different companies. Additionally, information can be updated without issuing a new card, avoiding duplication.

Technical aspects

Card issuance and data management: The company Hansab AS was selected through a public procurement process to issue and manage the Unified Worker Card. Workers use the card to register their entry and exit from the construction site by scanning it at designated points. The data is then transmitted to a centralised system, which processes it for compliance and monitoring purposes.

Main contractors are required to submit daily reports summarising the workers present on-site. Any discrepancies between reported and actual data may trigger an automatic inspection by the authorities. The system ensures that only non-sensitive, anonymised data is used for compliance checks, safeguarding personal information.

Available data: The card contains essential information, such as the worker's name, date of birth, national identification number, employer details, subcontractor information and the duration of the contract. Workers who do not have a national ID number must provide similar identifying details, confirmed by their employer.

Data accessibility: Workers and employees and construction companies can access the gathered data via the Estonian Tax and Customs Board (e-MTA) e-services on the TTKI system. Cards' information are accessed and stored when the card is scanned at the entrance and exit of the worksite.

Interoperability: The unified worker card is interconnected with the national System for Registration of Subcontracting chain and working time (TTKI).

Concluding remarks

The Unified Worker Card, introduced in 2023, is a critical tool for improving transparency in Estonia's construction sector. Although the system is still in its early stages, it has already been developed in consultation with national social partners, including trade unions and employers' organisations. The card scheme is also inspired by similar initiatives in neighbouring countries, such as Finland and Lithuania. Its effectiveness will continue to be assessed in the coming years.

FINLAND

Overview

- **Name of the card:** The Valtti-card service (*Valtti-älykortti*)
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** Vastuu Group
- **Main stakeholders involved:** Vastuu Group, Finnish social partners and relevant authorities (e.g. of occupational safety and health and tax)
- **Validity:** 3 years
- **Participation:** Showing an ID badge on the workplace is compulsory; the Valtti-card is a voluntary tool but widely used
- **Costs supported by:** Employer
- **Applied to posted workers:** Yes
- **Sector:** Construction, woodworking and shipyards.
- **Objective:** Combat undeclared work; to check construction site access; to identify workers and employers on site; to verify training and work experience
- **Data accessibility:** Visual, barcode and digital
- **Data storage:** Yes

ID

Purpose

The Valtti-card serves as legal ID for identifying workers on construction sites and helps combat undeclared work in Finland. It ensures compliance with tax and social protection regulations and verifies foreign workers' tax obligations, either in Finland or their home countries. The card also simplifies site access controls and reduces administrative burdens for construction companies by ensuring subcontractor reliability and curbing grey-market activities.

Background

Context: In 2012, Finnish social partners identified the need for better oversight of construction sites and clearer employer-subcontractor relationships. This led to the introduction of the "tax number," which evolved into a mandatory ID system for workers in Finland and served as basis for an ID card, aligned with the Finnish Health and Safety Act. Consequently, various types of ID cards have been developed in Finland by construction companies and a few commercial providers. However, these cards typically lack advanced technical features like chips and are relatively inexpensive. Among these cards, the most widely used and with a more developed technical infrastructure is the Valtti card.

Legal aspects

Legal basis: The Valtti-card, as other general social ID cards in Finland, is based on the Occupational Safety and Health Act (738/2002), which mandates that all workers on shared construction sites wear photo ID with their tax number. Since July 2022, this requirement also applies to shipyards. Workers' tax numbers must be registered in the Finnish Tax Administration's public register and employers are responsible for ensuring compliance.

The card also aligns with the Act on the individual tax number and the tax number register (473/2021), which governs procedures for issuing tax numbers and the roles of relevant authorities in maintaining the register.

Scope of application and participation: The scheme applies to all workers on joint construction sites, including self-employed individuals, security personnel and architects. Even workers present for short durations are included, except those delivering goods. Domestic house construction for private use is the only exemption. Contractors are responsible for ensuring their workers and subcontractors comply with these identification requirements.

Validity: The Valtti-card is valid for 3 years. If a worker changes employers, a new card must be issued during this period.

Data protection and compliance: Access to card data is protected by a PIN code, ensuring GDPR compliance and minimising the risk of fraud (see technical aspects for more information).

Other relevant information: Costing € 29, the Valtti-card is financed by Vastuu Group through service fees billed to employee organisations.

Technical aspects

Card issuance and data management: Vastuu Group, as the service provider, manages the Valtti-card system and issues cards. Employers sign agreements with Vastuu Group, which acts as the data controller. Employee information is stored in a central database and is always up-to-date. The card system also enables employers to track qualifications and skills, creating a centralised competence register.

Data from the card is transmitted to the site's systems, helping to generate the mandatory monthly list and reports submitted to the tax authorities.

Available data: Each card displays the worker's name and surname, tax number, company name, registration number, validity period and a photograph.

Data accessibility: The card's data can be accessed by authorities and verified during site inspections by occupational safety inspectors, tax authorities or police. Finnish Construction Trade Union officials can verify tax numbers but cannot impose fines. Data on the card can be accessed either by reading the card chip Unique Identifier and using it to access an Applicable Programme Interface (API) or by accessing the software on the card with a PIN code known only to the cardholder, similar to technology used in VISA cards. There are different levels of authorisation, with only certain access management systems having access to the API and access being logged for regulatory purposes at worksites.

Interoperability: The Valtti-card connects to the Finnish Tax Authority database, ensuring tax number verification before the card is issued. Several systems support the Valtti-card and it is possible to extend the card to store a company's own programmes. Its digital format allows interoperability, supporting cross-border operations for construction businesses.

Anti-fraud measures: The card includes security features, such as watermarks and encrypted chips, to prevent fraud and ensure data integrity.

Other relevant information: Until 2023, Vastuu Group supplied Valtti-cards in a package that included an orange Valtti smart card with an electronic chip and a blue Valtti personal ID card. The orange card was for access control, featuring electronically stored information, a barcode and a chip, while the blue card contained a standardised photo meeting occupational health and safety requirements. Now, Vastuu Group supplies only one card, coloured green. The orange/blue Valtti cards will continue to operate until at least 31 May 2025, unless the card expires earlier.

Concluding remarks

The Valtti-card, introduced in 2014, has become the primary identification tool for 90% of construction workers in Finland, with over 40,000 companies and 360,000 users adopting the system. The card's success is evident in its expansion to shipyards and potential adoption in other sectors, including hospitality and energy. Collaboration with tax authorities and labour organisations has improved compliance and worker identification on construction sites. Finnish social partners, the key promoters of the card, are satisfied with the results and the card's impact on reducing undeclared work has been significant.

FRANCE

Overview

- **Name of the card:** Carte BTP
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** CIBTP (Sectoral fund for construction workers)
- **Main stakeholders involved:** The technical services of the Police and Gendarmerie forces; National fund for the collection of social insurance and family benefit contributions (URSSAF); Ministry of Labour, Full Employment and Inclusion
- **Validity:** Linked with the employment contract/five years for temporary agency and posted workers
- **Participation:** Compulsory by law
- **Costs supported by:** Employers
- **Applied to posted workers:** Yes
- **Sector:** Construction
- **Objective:** To combat undeclared work; to identify workers and employers on the construction site
- **Data accessibility:** Visual, QR code and digital
- **Data storage:** Yes

ID

Purpose

The BTP card aims to reduce undeclared work and unfair competition by making it easier to identify workers on construction sites. The card provides quick access to information on workers' employers and contracts. It can also be used to ensure proper access control to construction sites.

Background

Context: In 2005, concerns about exploitative subcontracting arrangements and transnational worker posting prompted the development of a 'Construction Charter' by employers' organisations, in cooperation with trade unions and the government (the interministerial delegation against illegal work). The identification of workers via a card scheme was among the proposed recommendations. In 2006, a voluntary card was introduced upon initiative of social partners and management by UCF (now CIBTP). CIBTP is the not-for-profit organisation coordinating the network of French sectoral funds for paid leave and bad weather pay established by employers' organisations of the construction industry.

Legal aspects

Legal basis: The legislation establishing the card (Decree no. 2016-175) mandates CIBTP to manage and issue the card, as well as to cover the cost by charging a fee upon employers. The card became mandatory in March 2017 for all construction and public works projects, including in French overseas departments.

Scope of application and participation: The card is compulsory for all employees on construction sites, including temporary agency workers and posted workers. However, the obligation does not cover self-employed workers or company owners. Nevertheless, they can apply for the card, for instance if it is used for site access control. Some workers like architects or delivery personnel and employees working on private house construction are exempt from the card requirement.

Validity: The card remains valid for as long as the worker is employed by the same employer. Temporary agency and posted workers have a card validity of five years. From April 2024, responsibility for obtaining the card for posted workers shifted to the sending undertaking (regardless its status), not the host company. It was not the case before for foreign temporary work agencies sending workers in France. This change aims to align the rules for domestic and foreign companies.

Data protection and compliance: CIBTP processes personal data under legal obligations, as detailed in the Order of 20 March 2017. The data are retained for five years after the end of the card's validity. Employers are legally required to inform employees about the submission of their personal data for card issuance.

Other information: The card costs €9.80, payable once upon issuance. This fee covers production, delivery, system maintenance and customer care services. Employers failing to provide the card may be fined up to €4,000 per worker, rising to €8,000 for repeat offences. The total amount of the fine (there are as many fines as there are employees affected by the breach) may not exceed €500,000

Technical aspects

Card issuance and data management: The CIBTP manages the issuance and updating of the Carte BTP under the supervision of the Ministry of Labour. Employers request the card via an online platform, after which CIBTP arranges for the card's printing and delivery to the company. Employers receive a provisional certificate immediately, allowing workers to access the site while awaiting the physical card.

Employers' organisations, along with CIBTP's network of funds, meet several times a year to assess the card's management and operations. The card's identity information, such as the worker's name, gender and photo, is based on the employer's self-declarations without additional verification by CIBTP.

Available data: The card displays key details, including the worker's name, gender, photo and employment status (e.g. posted or temporary worker). It also shows the card number, issue and expiration dates and employer identity (except for temporary agency and posted workers). Data are stored in the SI-CIP database, which also holds additional information such as the worker's date of birth, nationality, contract type and – if applicable – residence and work permit. Employer details, construction site information and contract duration are also recorded.

Employers are responsible for notifying CIBTP of any changes, such as contract extensions, to update the card. From April 2024, for temporary and posted workers, the card will include the company registration number, client name and work periods, but not the specific location of work.

Data accessibility: Data stored on the card can be accessed by scanning the QR code. This allows to check the card's validity and whether a mission (for tempo-

rary or posted workers) is ongoing. Enforcement bodies, such as labour inspectors and police, can access a full set of data by scanning the QR code or accessing the SI-CIP database. Contracting authorities and clients can use the QR code to verify that subcontractors or temporary workers have valid cards.

CIBTP itself can access data via the SI-CIP database, but its inspectors cannot demand to see the card. When companies use the card for site entry control, the data are not stored by CIBTP, but by the companies themselves. CIBTP's system only verifies the card's validity and, in the case of temporary and posted workers, whether an interim mission or secondment is in place.

Interoperability: At national level, the only third-party system connected to Carte BTP is SIPSI, which handles data on posted workers. Through SIPSI, CIBTP receives information about postings in the construction sector and can request additional data from the sending companies to issue the cards. Changes to the duration of postings are automatically shared. In cases of multiple postings for the same worker, the system links the new declaration to the existing card.

Carte BTP is not interoperable with databases from other Member States. CIBTP cannot cross-reference data stored in the card with those held by CIBTP's network of sectoral funds.

Anti-fraud measures: The National Printing House (*Imprimerie Nationale*, now *IN Groupe)* prints the card and includes a hologram to prevent forgery. Additional security features, such as a UV-visible watermark are also employed to ensure authenticity.

Other relevant information: CIBTP has implemented several technical improvements, including a tool for automatic photo cropping and detection of non-compliant photos. A mobile app has also been introduced to facilitate the submission of photos by workers, addressing concerns over the time-consuming nature of photo verification.

Concluding remarks

The Carte BTP has become an important tool in France to combat undeclared work. In 2021, the absence or invalidity of the card accounted for 21% of administrative sanctions issued by the Ministry of Labour. While challenges remain, particularly regarding compliance for temporary and posted workers, the card has proven effective in increasing transparency and accountability on construction sites. The absence of validation of information is not of great concern, from CIBTP side, as false information can easily be detected and very few cases were spotted so far.

ICELAND
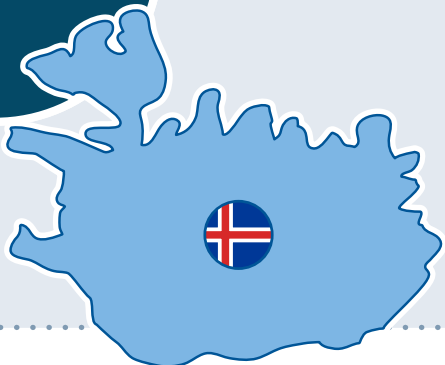
Overview

- **Name of the card:** Workplace ID (*Vinnustaðaskírteini*)
- **Status:** In operation
- **Issuance:** Decentralised
- **Issuing authority:** Construction companies
- **Main stakeholders involved:** Icelandic Confederation of Labour (ASÍ), the Confederation of Icelandic Employers (SA), Icelandic Directorate of Labour
- **Validity:** No specific validity period
- **Participation:** Compulsory
- **Costs supported by:** Employer
- **Applied to posted workers:** Yes
- **Sector:** Construction and other sectors indicated in the social partners' agreement
- **Objective:** To identify workers and employers on the construction site; to combat undeclared work
- **Data accessibility:** Visual and digital
- **Data storage:** Yes

Purpose

The primary purpose of the Workplace ID is to combat undeclared work and prevent social dumping. It helps facilitate labour inspections and better ensure compliance with relevant laws, regulations and wage agreements between employers and employees. While the law does not explicitly mention site access, many companies also use the card for this purpose.

Background

Context: In 2010, Iceland introduced Act no. 42/2010 on Workplace ID Cards and Workplace Inspection. This Act allows social partners to determine which occupations and industries fall under its scope. The agreement, originally reached on 15 August 2010, was later amended in 2011 and 2013.

By law, social partners can appoint inspectors to enforce compliance with the Workplace ID requirements and workers are required to present their ID cards during inspections.

Legal aspects

Legal basis: The Workplace ID card scheme is governed by the 2010 agreement between Icelandic Confederation of Labour (ASÍ) and the Confederation of Icelandic Employers (SA), supported by Act no. 42/2010. This legislation enables social partners to determine which sectors and occupations are to comply with the requirements of the scheme. Employers are responsible for ensuring that all workers, whether employed directly, through temporary agencies, self-employed or posted workers, carry and display their workplace ID cards while on-site.

Scope of application and participation: The scheme applies to multiple sectors, including construction, hospitality, retail, agriculture, transportation and many others. The agreement describes monitoring procedures for both employers and employees within these sectors.

Validity: There is no specific validity period.

Data protection and compliance: The workplace ID card is compliant with GDPR.

Other relevant information: The card is free for the workers. Due to its decentralised approach, there is no clear indication about the cost of the Workplace ID. The issuance of the tool is covered by the company while the costs for the management of the database is shared

between social partners. The Directorate of Labour, as the enforcing authority, sends notifications to non-compliant companies with a deadline to issue the cards. Employers who fail to issue the card despite the notification face fines of up to ISK 100,000 per day for repeated violations, as outlined in Article 6 of the 2010 law.

Technical aspects

Card issuance and data management: Companies are responsible for issuing Workplace ID cards, as outlined in the social partner agreement. Large construction firms often print the cards for themselves and smaller companies. Cards can be printed on plastic or paper, containing only the necessary information. Many companies use commercial printing services.

Data are collected by social partners' inspectors and manually entered into their database. These data are then shared with relevant national authorities, such as the tax authority, Social Insurance Administration, police and immigration authorities, to verify compliance with the law.

Available data: The card displays employer's name and national ID, the employee's name and national ID (or birth date for workers without an Icelandic ID), a photo of the employee and job title.

Data accessibility: Cards are visually checked by social partner inspectors, who manually input data into the database. Inspectors from the social partners shall send the information stated on workplace ID cards to the tax authorities, the Directorate of Labour, the Social Insurance Administration, chiefs of police and, when relevant, the Directorate of Immigration and the National Registry, so that it is possible to find out whether the employer or employee is working in accordance with the relevant act that each institution is supposed to implement. Cooperation with police may be sought if necessary.

Interoperability: The Workplace ID card is not interoperable with other national systems.

Anti-fraud measures: The workplace ID lacks anti-fraud measures and does not include chips or QR codes.

Concluding remarks

The Workplace ID card scheme is an important tool for social partners, enabling inspectors, particularly from trade unions, to monitor compliance with labour laws and agreements. However, the decentralised nature of the scheme limits its effectiveness.

Although larger companies favour electronic cards, social partners are hesitant to adopt a fully centralised digital solution due to concerns over costs and ownership. Despite these challenges, the Icelandic Directorate of Labour has acknowledged the need for a more centralised and digital system, similar to Norway's model, to improve the accuracy and reliability of the collected data.

ITALY

1. TESSERA DI RICONOSCIMENTO

Overview

- **Name of the card:** *Tessera di riconoscimento*
- **Status:** In operation
- **Issuance:** Decentralised
- **Issuing authority:** Employer or self-employed him/herself
- **Main stakeholders involved:** Paritarian funds (*Casse Edili*/*Edilcasse*)
- **Validity:** Linked with the employment or service contract
- **Participation:** Compulsory
- **Costs supported by:** Employer, self-employed or sectoral fund
- **Applied to posted workers:** Yes
- **Sector:** All (limited to contracted or subcontracted activities)
- **Objective:** To combat undeclared work
- **Data accessibility:** Visual
- **Data storage:** No

ID

Purpose

The primary function of the *Tessera di riconoscimento* (identification card) is to combat undeclared work and to improve identification of employment relationships, particularly in subcontracting chains. It is designed to assist companies and inspectors in identifying workers and verifying employment details.

Background

Context: The card was introduced to address concerns about undeclared work and transparency within subcontracting chains, especially in the construction sector, where it was first implemented. As highlighted by the Ministry of Labour in Communication no. 29/2006, undeclared work is often linked to occupational health and safety (OSH) risks. The identification card was introduced alongside sanctions that allowed for construction work to be halted if a significant percentage of workers (initially 20%, later reduced to 10%) were found to be undeclared. The introduction of the card also followed various legal reforms starting in 2003, which revised subcontracting rules and reinforced joint liability between contractors and subcontractors.

Legal aspects

Legal basis: The Legislative Decree no. 81/2008 on OSH requires employers involved in contracted or subcontracted work to provide workers with ID cards, which must be worn visibly. In construction sites, the card was already mandatory in 2006 following the adoption of Article 36 bis of Law Decree no. 223/2006.

Scope of application and participation: The card is required for all activities involving contracts or subcontracting, whether in construction or other sectors.

Validity: The card does not have a specific validity period, as it is linked to the duration of the employment or service contract.

Data protection and compliance: The scheme is not linked to a database, it does not involve data sharing. Its purpose is to provide immediate, visual access to worker information.

Other relevant information: Employers who fail to issue the card can be fined up to €500 per worker, while workers who do not wear the card can be fined up to €300. Both fines are subject to adjustment based on inflation.

Technical aspects

Card issuance and data management: Employers are responsible for issuing the card and self-employed individuals are responsible for their own cards. In the construction sector, some paritarian funds (*Casse Edili/Edilcasse*) offer a service that allows companies to create the card online or submit the necessary data for printing and delivery.

Available data: The card is purely physical. It must include a photograph, personal data to identify the worker and the name of the employer. It must also display the worker's hiring date and, in the case of subcontracting, the authorisation date. For self-employed individuals, the card must include the name of the client.

Data accessibility: Construction site managers or inspectors can visually check the available data directly on the card worn by the worker.

Interoperability: Being a physical tool, the card is not interoperable with digital systems.

Anti-fraud measures: The card does not include anti-fraud systems. Site managers and inspectors must cross-check the information on the card with other identification documents and relevant data they have.

Concluding remarks

There are no data available from inspection reports regarding compliance with the identification card requirements. Experience from local protocols designed to tackle undeclared work in construction, often involving paritarian organisations and social partners, suggests that while the identification card improves transparency in subcontracting chains, it is not enough on its own to ensure regular employment practices in the sector.

2. CIPE

Overview

- **Name of the card:** *Carta di Identità Professionale Edile* (CIPE)
- **Status:** Under Development
- **Issuance:** Centralised
- **Issuing authority:** Paritarian funds (*Casse Edili/Edilcasse*)
- **Main stakeholders involved:** Vocational training paritarian funds (*Scuole Edili*)

- **Validity:** Not yet defined
- **Participation:** Compulsory
- **Costs supported by:** N/A
- **Applied to posted workers:** N/A
- **Sector:** Construction
- **Objective:** To provide evidence and compliance of health and safety training; to provide evidence of training and/or work experience
- **Data accessibility:** N/A
- **Data storage:** Yes

Purpose

The CIPE is designed to support and highlight vocational training provided by sectoral paritarian schools (*Scuole Edili*) and track deadlines for OSH medical surveillance. It may also simplify the management of incentives for training, introduced through collective agreements.

Background

Context: The CIPE builds on local experiences with badges in Italy, showing the potential for data sharing and coordination between paritarian institutions (*Scuole Edili* and *Casse Edili/Edilcasse*). It is also inspired by similar initiatives abroad, such as Spain's TPC.

Trials and pilots: Although there have been no formal pilots, social partners and paritarian institutions in the construction sector have already managed local initiatives with badges to ensure employment regularity and compliance with collective agreements. These schemes have typically targeted construction sites of a certain scale or large projects (see the box below for some recent initiatives).

Legal aspects

Legal basis: The three national sectoral collective agreements signed in 2022 and 2024 by representative social partners of the construction sector mandate the introduction of the card.

Scope of application and participation: The CIPE will be compulsory for all companies applying the sectoral collective agreement and would probably only apply to blue-collar employees. The exact application for temporary agency and posted workers is yet to be clarified.

Validity: The validity of CIPE has not yet been defined.

Data protection and compliance: While specific data protection aspects have not yet been established, data on workers' personal details and vocational training are already subject to privacy policies enforced by the paritarian organisations involved and worker's consent upon registration.

Technical aspects

Card issuance and data management: The CIPE will be issued by Italian sectoral paritarian funds (*Casse Edili/Edilcasse*), which manage holiday pay and other remuneration for construction workers. The collective agreements have tasked CNCE with defining the card's features. Social partners are currently working on refining the card's content and technical aspects.

Available data: The CIPE shall contain data related to vocational training completed at sectoral training schools (*Scuole Edili*) and track deadlines for OSH medical surveillance. The collective agreement targeting artisanal companies requires inclusion of information on training supplied by the *Mastro Formatore Artigiano* (a recognition vesting experienced artisan employers in the sector) and opens up to inclusion of other kind of information.

Data accessibility: The levels of authorisation and access have yet to be determined. Likely, workers, employers and paritarian institutions will have access to the relevant data in line with CIPE's purpose.

Interoperability: The technical details regarding interoperability are still under discussion. The card could be a physical or digital tool, with most of the work focusing on backend systems to improve existing databases that track vocational training and other relevant information.

Concluding remarks

As the CIPE is still under development, its effectiveness cannot yet be evaluated.

The local experiences of badges in the Reggio Emilia and Latina provinces

In Italy, several local initiatives have introduced card schemes for construction sites. These schemes are often implemented through partnerships between paritarian funds and local authorities, based on territorial collective agreements or arrangements with Prefectures. The cards are typically used in areas undergoing major construction projects (e.g., the 2015 Milan Expo site or earthquake-affected regions) or where there is a high risk of economic interference from criminal organisations.

Reggio Emilia

The scheme in Reggio Emilia is based on an agreement between the Prefecture, contracting authorities, inspection bodies, social partners and local paritarian institutions (*Edili Reggio Emilia Cassa* and *Edili Reggio Emilia Scuola*).

This digital card is managed via an app, requiring workers to register their entry and exit from construction sites by scanning a QR code. The system is cost-free for companies, which only need to print and display the QR code at site entrances, and for workers, who use their smartphones to register their attendance. The card scheme is currently in a pilot phase, with public contractors committed to using it for construction sites valued at over €500,000 and lasting no less than six months.

Latina

In Latina, the card is integrated into the mobile application that workers use to manage their relationship with the *Cassa Edile di Latina*. Workers can select their active construction site from company declarations, which are verified through GPS location data and record their daily attendance. These data feed into an observatory that tracks the presence of workers and companies on each site. This information is accessible to companies, public contractors and inspectorates.

The scheme in Latina is promoted through the territorial collective agreement, which offers reduced contributions to the *Cassa Edile* for companies that adopt the system. Additionally, a protocol between social partners and the Province of Latina mandates the card's use on public construction sites worth at least €150,000 framed by other provisions to enhance OSH. Several local municipalities have also committed to applying similar provisions in their public contracts.

LATVIA
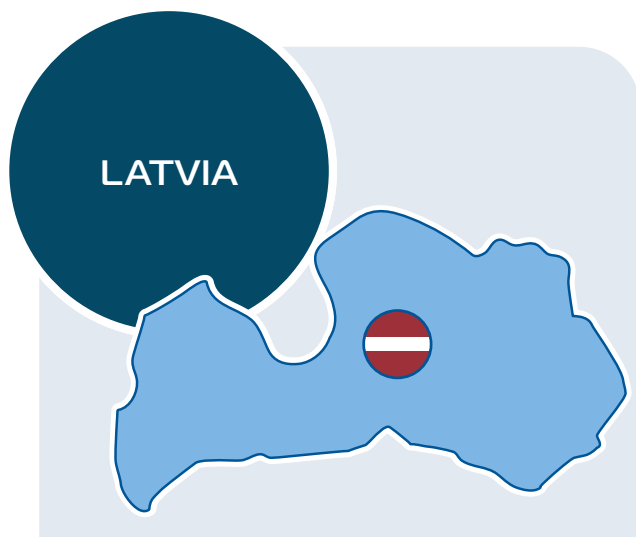
Overview

- **Name of the card:** Electronic working time system and worker's ID card
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing Authority:** Employer
- **Main stakeholders involved:** Ministry of Economics
- **Validity:** No specific validity period
- **Participation:** Mandatory
- **Costs supported by:** Employer
- **Applied to posted workers:** yes
- **Sector:** Construction
- **Objective:** To combat undeclared work; to identify workers and employers on construction sites
- **Data accessibility:** Digital
- **Data storage:** Yes

ID

Electronic working time system and worker's ID card
(no photo available)

Purpose

The Electronic working time system and worker's ID card aim to combat undeclared work in Latvia's construction sector. By tracking workers' entry and exit times, it provides a record of their working hours, helping to curb the shadow economy and improve compliance.

Background

Context: In 2015, trade unions and employers proposed a social ID card scheme to consolidate personal and employment information and increase transparency. When the initiative became law in 2015, the final regulation focused on tracking working hours, leaving out qualifications. In 2016, the government introduced regulations requiring electronic working time tracking for construction projects exceeding €350,000 or involving public buildings like schools or malls. The system combines two tools: an Electronic Working Time System and a non-standard ID card to monitor workers' hours and presence on-site.

Legal aspects

Legal basis: The system is regulated by the Law on Taxes (Chapter 14, points 107-118) and specific regulations on employee cards. Workers at construction sites must log their hours using an electronic system. The law provides flexibility in how time is tracked (via a card, phone app, etc.), as long as hours are recorded accurately. Main contractors are responsible for ensuring the system is in place and subcontractors use the same system. Failure to comply can result in fines for both employers and workers. In the event of a workplace inspection, the main constructor must provide a list of workers and their working hours on the site.

Scope of application and participation: This system is compulsory for all workers on construction sites, including posted workers and self-employed individuals. All workers, regardless of the type of work, must record their hours unless they are delivering materials or are inspectors.

Validity: The scheme does not have a specific validity period.

Data protection and compliance: The system adheres to GDPR and operates at a national level.

Other relevant information: The costs of setting up and maintaining the system are borne by the employer.

The main contractor is responsible for implementing the system and costs are shared with subcontractors. Self-employed workers must finance their own compliance. Fines for workers who fail to register their hours range from €10 to €20, while penalties for employers depend on the number of violations, as outlined in the Law of Taxes (Art. 144).

Technical aspects

Card issuance and data management: Employers are responsible for issuing the ID card and maintaining the Electronic Working Time System. These tools are decentralised, meaning different forms of ID cards and systems can be used. The main contractor must submit data to Latvian authorities, with information accessible to regulatory bodies online for tax and compliance purposes. The system tracks hours for the State Revenue Service and supports statistical analysis for the Central Statistical Bureau.

The system integrates with a database for securely storing workers' entry and exit data. Each worker must provide their name, personal code (or date of birth for foreign workers), profession, employer, construction site number and working hours. Workers scan their ID card or app at site entry gates, often with additional manual verification.

Available data: The ID card includes personal information such as the worker's name, photo, date of birth, employer and validity period. Some employers integrate this card with the Electronic Working Time System to streamline management processes.

Data accessibility: Data are accessed digitally through the system when workers scan their card or app. The main contractor must report the working hours of all workers by the 15th of each month to the relevant state authorities. During inspections, contractors must present a full list of workers present on the worksite and their working hours.

Interoperability: The system is not directly interoperable with other databases, though it allows for data to be shared with state services.

Anti-fraud measures: The system itself must be audited every two years by authorised companies, but there are no specific anti-fraud features for the ID cards.

Other relevant information: The Building Information System (BIS), under The Ministry of Economy, oversees this system and cross-references data with the state revenue service to adjust social security taxes.

Concluding remarks

While the current system is less comprehensive than the initial vision from 2015, it functions adequately. Social partners continue to advocate for expanding the card to include training and OSH certification data. Trade unions have raised concerns about workers not registering their hours properly, which could be addressed through more frequent inspections.

LITHUANIA

1. TRANSPARENT WORKER ID CODE

Overview

- **Name of the card:** Transparent Worker ID Code
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** State Social security fund (SODRA)
- **Main stakeholders involved:** Ministry of Social Security and Labour, the State Labour Inspectorate of the Republic of Lithuania and the Lithuanian Employment Service
- **Validity:** Linked with the employment contract or self-employed status
- **Participation:** Compulsory
- **Costs supported by:** SODRA
- **Applied to posted workers:** Yes
- **Sector:** Construction
- **Objective:** To combat undeclared work; other (to ensure compliance with tax payment)
- **Data accessibility:** QR code
- **Data storage:** no

ID

SKAIDRIAI DIRBANČIOJO ID

Asmens statusas / Status of the holder
Apdraustasis asmuo

Vardas, pavardė / Forename, surname
ROBERTAS ENCIUS

Draudėjo / juridinio asmens kodas / Insurer's / legal entity's code
45325

Draudėjo pavadinimas / vardas, pavardė / Insurer name / forename and surname
страхователя / Имя, ф
LIETUVOS STATYBININKŲ ASOCIACIJA

Purpose

The primary purpose of the Transparent Worker ID Code is to confirm whether a worker is covered by an employment contract or registered as self-employed, helping to improve compliance with taxation and to reduce undeclared work.

Background

Context: The Labour Inspectorate began developing the Transparent Worker ID Code in 2020 as an evolution of the previous Employee Identity Certificate, which was more of a physical badge. The new system became operational in April 2022. Social partners were involved in the early stages, as they had been pushing for new tools to tackle undeclared work.

Future goals: Possibly starting from next year, the Transparent Worker ID Code will embed information on working time.

Legal aspects

Legal basis: The Transparent Worker ID Code is rooted in Law on Construction, no. XII-2573 and in the Law on Social State Insurance (No. XII-2508).

Scope of application and participation: The Transparent Worker ID Code applies to domestic workers and workers posted to Lithuania, both from EU and non-EU countries. All workers accessing a construction site must have the ID code, whether employed or self-employed. Exceptions include visitors or suppliers who are not directly involved in the construction work, although their access must still be recorded in the site's journal.

Validity: The code remains valid as long as the worker's employment contract, self-employment status or posting to Lithuania is active. Afterwards, the ID code will show as invalid when scanned and the worker shall have to obtain a new code

Data protection and compliance: The legislation designates the bodies authorised to access the code. The app for scanning the code is freely available and workers can display the code to others as needed.

Penalties: Fines apply for failure to have a Transparent Worker ID Code, targeting both employers and workers, with larger fines for employers in cases of undeclared work. Inspectors encourage workers to apply for the code if found without one during inspections.

Technical aspects

Card issuance and data management: The Transparent Worker ID is managed by SODRA. Workers can request the code online, via email with an e-signature or in person at a SODRA office. In case of posting, the code can be required also by the host Lithuanian company on behalf of workers.

Available data: The Transparent Worker ID Code encrypts up to date information on the status (employed or self-employed) of the associated person, ensuring the worker is declared to tax authorities.

Data accessibility: Workers must present the QR code to inspection authorities (labour inspectorate, tax inspectorate, finance investigation authorities, police), employers, builders and main contractors. Contractors, developers and homeowners, who are subject to joint liability, can also check the code to ensure compliance. The QR code can be scanned by anyone with permission, usually displayed on a smartphone but it can also be printed or shown on a helmet.

Interoperability: The card does not include a photo of the person, so inspectors must cross-check identities using other documents, such as an ID or passport. The scheme is not interconnected with other tools in other countries, but inspectors can use various national databases for further checks.

Anti-fraud measures: The card is issued directly by SODRA, with data stored securely on its servers. Fraud risk is mitigated by inspectors verifying the worker's ID or passport alongside the code during inspections.

Other relevant information: The Transparent Worker ID Code is free to workers. The initial development cost of the system was approximately €100,000. As it runs on SODRA's servers, it incurs minimal ongoing costs for the state.

Concluding remarks

The National Lithuanian Inspectorate reports that undeclared work in the construction sector has dropped from 64% in 2021 to 55% in 2023, a result which seems linked to the introduction of the Transparent Worker ID Code and to recent legal changes imposing high fines for non-compliance and joint liability on contractors, developers and homeowners.

However, employer organisations argue that the system could be improved. One issue is the lack of information about workers' specific roles or employers, making it difficult to verify whether workers are employed by the relevant company or have occupations related to construction. There is also criticism about the absence of working time information, though future changes to the law may address this.

2. STATREG

Overview

- **Name of the card:** Builder's card (STATREG)
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** Department for Competence Assessment of the Lithuanian Construction Association (LCA)
- **Main stakeholders involved:** Employers members of the LSA Qualification and Competence Committee
- **Validity:** Five years
- **Participation:** Voluntary
- **Costs supported by:** Employer
- **Applied to posted workers:** Yes
- **Sector:** Construction
- **Objective:** To combat undeclared work; to check construction site access; to identify workers and employers on the construction site; to provide evidence of training and/or work experience.
- **Data accessibility:** Visual, QR code and digital
- **Data storage:** Yes
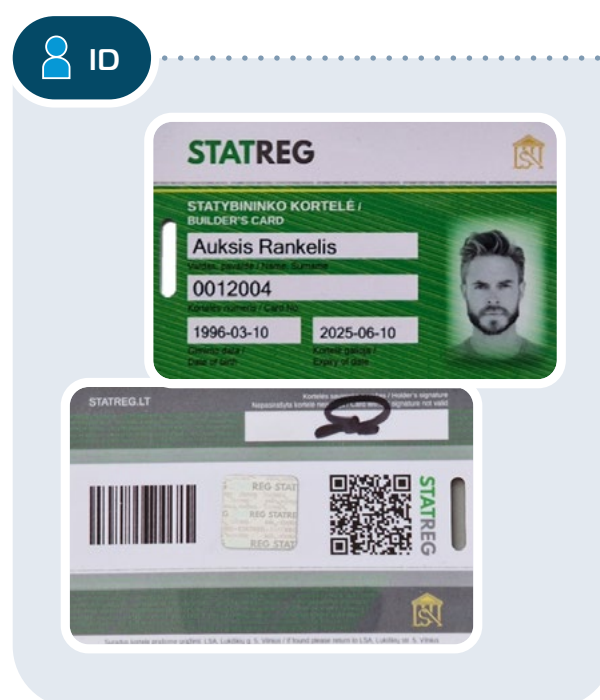
Purpose

The main purpose of the STATREG card is to certify the competences of workers. To a limited extent, it may be used to monitor employment regularity. Likewise, in some cases, the card is used to display OSH training qualifications, though classification and access to this data are still being developed.

Background

Context: The scheme derives from the ENERGOTRAIN Build Up Skills project, launched in 2017 by the Lithuanian Construction Association (LCA) and other partner organisations, which aimed to certify and assess the competences of construction workers. This laid the foundation for the Competence Assessment Department and the introduction of the scheme.

Legal aspects

Legal basis: The scheme is not based on specific legislation or a collective bargaining agreement, being a tool offered by the LCA.

Scope of application and participation: Use of the card is voluntary. It complies with standards on vocational training validation. The card can be requested by companies or workers with a EQF level ranging from I to V, including self-employed individuals and workers posted to Lithuania. Employers often require it for all their employees. It can also be issued to temporary agency workers, although only for purposes of tracking access and working time.

Validity: The card is valid for five years, after which a new card should be issued.

Data protection and compliance: Data processing is based on the individual's consent as it is a voluntary scheme.

Technical aspects

Card issuance and data management: The card is issued by the LCA after an online request from either the employer or the worker. It can also be requested through a company STATREG representative.

Available data: The card stores data on workers' roles, tasks, competences, skills and qualifications. It also includes personal information such as a photo, name and date of birth, along with the identification number of the card and expiration date.

Data accessibility: Data can be accessed via a QR code or NFC technology, either on the card or through card readers. Information on competences, employment status and card validity can also be checked online through the STATREG web platform by entering the card ID or name.

Interoperability: The card is backed by the STATREG database, whereby the LCA registers competencies of workers according to the National Qualifications Framework. The STATREG is connected with SODRA data, with regular checks on whether workers have a valid QR code or not.

Currently, the scheme is not interconnected with other countries, however, the LCA is working on interoperability with systems in Finland and potentially other Nordic countries.

Anti-fraud measures: The STATREG card uses hologram and microtext to combat counterfeiting.

Other relevant information: The card is available in three versions: one for construction company owners, one for civil engineers and one for employees. The employee card may be issued even if no competences are validated, in this case, being used solely for identification and tracking purposes. The cost of the card is €12, with additional fees for verifying competences. In fact, certifications stored in the STATREG database follow a procedure of assessment, entailing observation at work or during training, explanation by the worker of choices made in the work process and a questionnaire targeting competences. Representative of trade unions may also take part in the assessment as observers.

Concluding remarks

The STATREG card offers various functionalities, but its usage remains voluntary. As the European Commission develops a card for civil engineers, the LCA sees STATREG as a model that could inform future European discussions.

LUXEMBOURG

Overview

- **Name of the card:** Badge Social
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** *Inspection du travail et des mines* (ITM)
- **Main stakeholders involved:** *Inspection du travail et des mines* (ITM) and all companies posting workers to Luxembourg regardless of sector
- **Validity:** The duration of the posting period of the worker
- **Participation:** Compulsory
- **Costs supported by:** Employers
- **Applied to posted workers:** Exclusively
- **Sector:** All sectors
- **Objective:** To combat social dumping; to ensure identification of posted workers and employers on site
- **Data accessibility:** Visual and digital
- **Data storage:** No
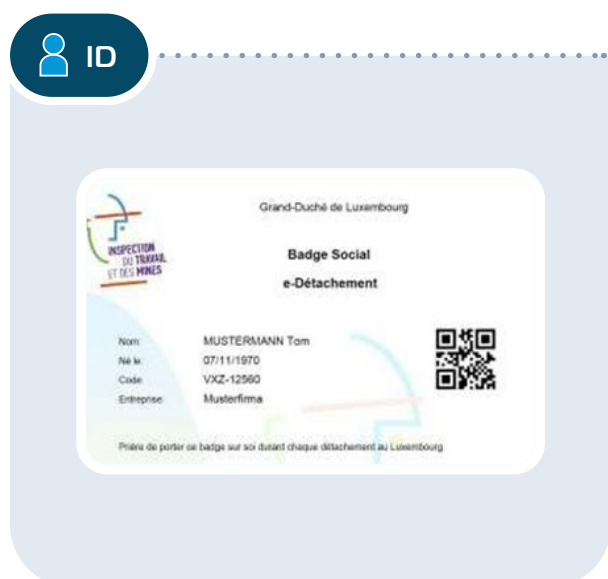
Purpose

The main purpose of the *Badge Social* is to combat social dumping by identifying posted workers registered to work in Luxembourg. It allows authorities to verify various details, such as work status, social security, OSH compliance and the validity of work and residence permits. The card also supports the validation of the prior notifications of posted workers.

Background

Context: The Badge Social is intended specifically for posted workers across all sectors. It was introduced by the Labour and Mine Inspectorate (ITM) in 2017, following consultations with social partners and approval from the Minister of Labour. The card was developed alongside the *e-Détachement* platform, a system designed to facilitate the notification and tracking of posted workers.

Legal aspects

Legal basis: The legal framework for the Badge Social is found in Title VI of Book I of the Labour Code. Article 3 of the Law of 17 June 1994, amended in 2017, provides the authority for the Minister of Labour to introduce a card scheme to monitor compliance with labour, social security and occupational safety regulations. Article L.142-2 of the Labour Code requires companies posting workers to Luxembourg to notify the ITM via an electronic platform, where they submit information necessary for the Badge Social. Any changes in work location or services must be reported promptly. Service providers using subcontractors must verify that the subcontractor has properly declared its workers to ITM.

Scope of application and participation: The card is mandatory for all companies posting workers to Luxembourg, regardless of sector. It is not applicable to self-employed workers.

Validity: The card is valid for the duration of the worker's posting period in Luxembourg.

Data protection and compliance: Personal data submitted to the ITM are processed in compliance with GDPR.

Other relevant information: Employers only have to cover the small cost of printing the card.

Technical aspects

Card issuance and data management: The ITM manages the issuance of the *Badge Social*. It is a paper-based card with no chip and no direct data storage; instead, relevant information is stored in the ITM database. When employers submit a posting notification through the *e-Détachement* platform, the data is transmitted directly to ITM's systems, which labour inspectors can access for compliance checks. Employers must ensure that worker details are kept up to date and can reprint cards if they are lost or damaged via the online app.

Available data: The card contains information on the sending employer and its representative in Luxembourg, the posting start date and duration and the applicable worksite(s) in Luxembourg. It also includes employee details, such as name, date of birth, nationality, job title and employment status during the posting period.

Data accessibility: Labour inspectors can access information on the card by physically checking it or by scanning the QR code for quick verification. Inspectors and other authorised personnel have access to the ITM database to cross-check information on posted workers, with varying levels of access depending on their roles. The ITM system features various levels of authorisation, granting access to specific data only to individuals with appropriate roles and responsibilities. This controlled access mechanism upholds data security and privacy standards while facilitating the effective enforcement of labour laws and regulations.

Anti-fraud measures: No specific anti-fraud measures are in place

Concluding remarks

There has been no formal evaluation of the Badge Social's impact, particularly in sectors like construction. However, the tool is viewed positively by social partners, as it was introduced at the request of employers and is supported by the trade unions. This broad support reflects the shared recognition of the importance of transparency and compliance in the posting of workers.

NETHERLANDS

Overview

- **Name of the card:** BouwplaatsID
- **Status:** Under development
- **Issuance:** Centralised
- **Issuing authority:** N/A
- **Main stakeholders involved:** N/A
- **Validity:** 5 years
- **Participation:** Compulsory
- **Costs supported by:** Employer
- **Applied to posted workers:** Yes
- **Sector:** Construction
- **Objective:** To combat undeclared work; to check construction site access; to identify workers and employers on the construction site; to improve compliance and evidence of health and safety training; to provide evidence of training and/or work experience; other (to enforce collective agreement provisions, in particular affiliation to the occupational pension fund).
- **Data accessibility:** Visual, QR code and digital
- **Data storage:** Yes

ID

BouwplaatsID
(no photo available)

Purpose

The BouwplaatsID, if adopted, would serve multiple purposes, including combating undeclared work, improving safety on construction sites and ensuring compliance with collective agreements. It is envisaged to track workers' attendance, verify qualifications and support wage and pension fund enforcement, while reducing the administrative burden on contractors and supervisors.

Background

Context: The BouwplaatsID initiative was first conceptualised in 2013, when social partners and the Dutch Tax and Customs Administration explored the introduction of an ID card for the construction sector to tackle undeclared work and improve compliance. A survey in 2014, followed by further analysis, led to the proposal making part of the 2015 sectoral collective agreement. However, the government chose not to declare the agreement universally binding due to "concerns about privacy" and the card's scope beyond construction companies (as it would target all companies active in construction sites).

In 2022, the Dutch Parliament passed resolutions calling on the government to reconsider a scheme. The government is now discussing the introduction of such a card, primarily focusing on site access management.

Labour inspectors in the Netherlands only enforce legal requirements and not those that make up part of collective bargaining agreements, despite the legislation which transposes the revised Posting of Workers Directive provides for the enforcement of universally applicable collective agreements. According to trade unions, the card scheme would go some way in helping enforce collective agreements, which often include wages up to 25% higher than the statutory minimum and ensure compliance with the sector's occupational pension scheme. The fragmented nature of the workforce, with many temporary and self-employed workers, has made it difficult to enforce these standards and the BouwplaatsID is seen as a potential solution.

Legal aspects (as proposed by social partners)

Legal basis: The legal framework for the BouwplaatsID has not yet been established.

Scope of application and participation: Social partners want the scheme to apply to all workers on construction sites, including employees, self-employed workers

and posted workers. The full set of databases backing the card would provide a full picture of construction sites and companies therein active

Validity: The card would be valid for five years.

Data protection and compliance: The card would follow strict privacy rules. Only necessary data would be collected and personal details would be kept private by using methods like pseudonymisation. This means that personal data would only be revealed when absolutely necessary, in compliance with GDPR.

Other relevant information: Following the halt to the social partners' proposal, voluntary commercial cards have developed (e.g., Bouwpas).

These tools are meant to check the identity of workers and accesses in construction sites. They can provide therefore be a tool to check the activities of subcontractors in the construction site.

Technical aspects (as proposed by the social partners)

Card issuance and data management: The card would be issued by a paritarian organisation, with employers paying for the card. The cost is expected to be a one-time fee. Data from the card would be stored in a central database, accessible online using a secure system.

Available data: The card would hold minimal visible information, such as the worker's ID number and photo. Most details, like worker attendance, qualifications, employment status and employer details, would be available digitally. The card would be able to track when workers enter and leave construction sites, recording their hours. It would also store information about health and safety certifications, other relevant qualifications and relevant information to flag possible infringements of collective agreements.

Data accessibility: The card would be able to allow supervisors, employers and workers to check important information online. Site supervisors would use the data to ensure workers are qualified to carry out their tasks and comply with health and safety rules. Labour inspectors could request data if needed, but they would not have direct access to them. Social partners would have limited access in case of suspected non-compliance with conditions set by collective agreements and following a specific procedure.

Interoperability: The BouwplaatsID would be able to link with other public databases, including those managed by the social security and tax authorities. It would also be connected to databases holding information on posting notifications and health and safety training.

Anti-fraud measures: The card would include security features such as a hologram and microtext to prevent counterfeiting or misuse.

Concluding remarks

The introduction of the BouwplaatsID card scheme remains under discussion, but it is seen by social partners as a crucial step towards improving oversight and transparency in the construction sector.

One of the card's potential benefits is its to streamline the verification of wages, working hours and pension contributions, areas where the construction sector has historically faced challenges. By connecting the card to both public and private databases, it would allow for accurate and up-to-date tracking of employment conditions, which is especially important for workers in non-standard employment relationships, who are especially more vulnerable to exploitation.

The BouwplaatsID would also serve as a valuable tool for improving health and safety on construction sites. The ability to instantly verify workers' qualifications and their compliance with health and safety regulations could reduce accidents and improve overall site safety by identifying workers operating machinery or carrying out activities without appropriate OSH training. For site supervisors and contractors, the card would simplify administrative burdens by offering a digital tool to monitor compliance in real-time.

While some companies have already introduced private cards for tracking workers' presence on construction sites, these solutions are not compulsory and are limited in scope.

NORWAY

Overview

- **Name of the card:** HSE card (HMS-kort/*byggekort*)
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** Labour Inspection Authority
- **Main stakeholders involved:** Labour Inspection Authority, social partners
- **Validity:** 2 years
- **Participation:** Compulsory
- **Costs supported by:** Employer or employee
- **Applied to posted workers:** Yes
- **Sector:** Construction, cleaning activities and car detailing
- **Objective:** To identify employers and employees on the construction sites; to combat undeclared work
- **Data accessibility:** QR code, digital
- **Data storage:** Yes

ID

Purpose

Primary functions: The HSE Card serves as an identification tool for both employers and employees, aiming to deter undeclared work, social dumping and illegal immigration. It provides Norwegian authorities and construction companies with an overview of workers and employers active on sites. The card is also used to enhance OSH measures on the worksite.

Background

Context: The HSE Card was introduced in 2008 by the Norwegian government in collaboration with social partners. It covers sectors such as construction, building, cleaning and car detailing. Managed by the Norwegian Labour Inspection Authority, the card simplifies identification and enhances transparency in these industries.

Legal aspects

Legal basis: The HSE Card is required by the Regulation on HSE Cards for Building and Construction Sites (Law/2005-06-17-62 § 4-1). It was introduced by the Ministry of Labour in 2007 under the Working Environment Act, which aims to protect safety, health and working conditions on construction sites. Workers are not allowed to work on these sites without a valid HSE Card.

Scope of application: The HSE Card is mandatory for all employees on construction sites, including foreign workers, contract staff, cleaners, transporters, apprentices and support personnel. The card is also required in the cleaning and car detailing sectors. Posted workers must have an HSE card, which requires a Personal ID number and registration with the Central Office for Foreign Tax Affairs. Non-EEA workers must also hold valid work and residence permits.

Validity: Each card is valid for up to two years, as long as the worker remains with the same company, because each card is specifically tied to an individual's employment and employer.

Data protection and compliance: Compliant with GDPR.

Other relevant information: The costs of the card are €11 plus 25% VAT every two years and this expense is covered by the employer. The card is produced and issued by Evry Card Services AS, which manages the card system under a contract with the Labour Inspection Authority. If a worker does not have a valid HSE

card, the Labour Inspection Authority can issue a so-called 'stop-work order'. Employers face fines of €1,100 for the first worker found without a card, with an additional €220 fine for each subsequent worker. In serious cases, the police may also be involved.

Technical aspects

Card issuance and data management: The HSE Card is issued by the Norwegian Labour Inspection Authority (*Arbeidstilsynet*). All data are stored currently by Evry Card Services. To obtain the card, workers must have a Personal ID number and be enrolled in the NAV State Register for Employers and Employees (*Aa-registeret*) and the National Population Register (*Folkeregisteret*). Foreign nationals must register with the Central Office for Foreign Tax Affairs and employers must be registered with the Central Coordinating Register for Legal Entities (*Enhetsregisteret*) and the VAT register (*Merverdiavgiftsregisteret*).

Available data: The HSE Card contains the worker's name, a photograph, date of issue, organisation number, employer information and expiration date.

Data accessibility: Card information can be accessed by scanning the QR code, chip or card number via the card producer's site. Labour inspectors, employers, police and tax authorities have full access to card data. During inspections, employees must show their valid HSE card. The card displays a green or red light indicating the card's status.

During inspections, employees are required to show a valid HSE card. These inspections may be conducted by law enforcement officials, health and safety agents, clients, inspectors from the Petroleum Safety Authority, the Norwegian Labour Inspection Authority or the Norwegian Tax Administration. When scanning the QR code, the virtual card displays a green (the card is valid and the worker compliant with regulations) or red (there is an irregularity and the worker cannot access the workplace) light in the upper right corner.

Inspectors physically verify the card during inspections, but a refresh button allows quick access to updated information to avoid discrepancies. The card's status is automatically updated daily by the Norwegian Labour Inspection Authority to reflect compliance with all stipulated requirements. On larger construction projects, the main contractor has the right to verify the validity of the subcontracting chain.

Interoperability: The card is connected to the Norwegian social security system.

Anti-fraud measures: The HSE card incorporates anti-fraud measures, including a hologram.

Other relevant information: HSE cards have an RFID chip, which is a contactless microchip. This chip stores information about the employee and the company they work for.

Concluding remarks

An impact assessment conducted by the Inspectorate shows that the HSE card is effective, though some challenges remain, such as misuse of the card (e.g., multiple workers using one card) and issues with photo capture. Social partners support the card but have raised concerns about external consultants charging workers for card application help, despite the low cost of €11 and the availability of a simple online application process.

Large construction companies were instrumental in pushing for the card and view it positively. However, smaller firms face difficulties with the associated costs. Overall, the HSE card is seen as a useful tool for enhancing compliance and transparency in Norway's construction, cleaning and car detailing sectors.

SPAIN

Overview

- **Name of the card:** *Tarjeta Profesional de la Construcción* (TPC)
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** Paritarian institution (*Fundación Laboral de la Construcción*, FLC)
- **Main stakeholders involved:** N/A
- **Validity:** Five years
- **Participation:** Voluntary
- **Costs supported by:** FLC
- **Applied to posted workers:** No
- **Sector:** Construction
- **Objective:** To improve compliance and evidence of health and safety training; to provide evidence of training and/or work experience
- **Data accessibility:** Visual, QR code and digital
- **Data storage:** Yes

ID

TPC
Tarjeta Profesional
de la Construcción

NOMBRE APELLIDO APELLIDO
0000 0000 0000000   CAD:00/00

Para actualizar tus datos e informarte de las ventajas de la TPC llama al
teléfono gratuito 900 11 21 21 o entra en www.trabajoenconstruccion.com

FUNDACIÓN LABORAL DE LA CONSTRUCCIÓN · CNC Confederación Nacional de la Construcción · CCOO hábitat · UGT-FICA

Purpose

The TPC card certifies that workers have received mandatory health and safety (OSH) training, as required by Law 32/2006 on subcontracting in the construction sector. The aim is to prevent accidents by ensuring that workers are adequately trained. The card can also be used to certify additional training and work experience, including job titles outlined in the collective agreement. Information on medical fitness for OSH compliance can also be added. Workers can use it as a digital CV to have their skills and experience recognised within the sector.

Background

Context: The card aims to regulate subcontracting and tackle undeclared work. The tool also addresses concerns by employers about bogus certificates of attendances of OSH courses.

Future goals: Article 156 of the current VII National Sectoral Collective Agreement mandates the future integration of other features linked with new functions of the TPC in the fields of complementary occupational pensions and labour market matching.

Legal aspects

Legal basis: The card builds on Article 10 of the Law no. 32/2006 on subcontracting which mandates certification of OSH training in the construction sector and entitles legislation and collective bargaining to define the modalities, possibly by means of a social ID card that can be delegated to paritarian institutions. The National Collective Agreement of the Construction sector (2007) defines the card's scope and regulations (now at articles 154-166).

Scope of application and participation: The card can be requested by all employees, whether directly employed by construction companies or through temporary agencies. It is also available to self-employed workers, unemployed workers with recent experience in the sector and students in vocational training related to construction. It does not apply to posted workers or those with training from abroad. Initially compulsory, following legal proceeding by local unions, its application remained voluntary. This is not expected to change in the near future.

Validity: The card remains valid for five years, with a duty for the worker to update information in the meantime by providing supporting documentation.

Data protection and compliance: The card is compliant with GDPR, with the worker's consent required for data processing. FLC provides an option for workers to consent to receive information on additional services.

Technical aspects

Card issuance and data management: The card is issued by FLC, a paritarian institution established by social partners of the construction sector, namely the CNC on the employers' side and CCOO hábitat and UGT FICA as unions. FLC manages its own training centres and also accredits external entities to provide the compulsory OSH training set up in the National Sectoral Collective Agreement as long as they fulfil given criteria.

Workers apply for the card, submitting supporting documents to FLC's contact points. The request is validated by FLC before the card is issued.

Available data: The card contains the worker's identity, photo, expiration date and a unique personal code. It stores validated information on OSH training and medical fitness, while workers can voluntarily add details of other completed training, not validated by FLC.

Data accessibility: The physical card allows immediate verification of a worker's identity and OSH training status. By scanning the QR code, employers can access an online record of the worker's certifications and check if the worker is fit to work (with the worker's consent).

Employers may download CVs of workers, including training records and OSH training certificates and view if a worker is fit to work (NB: not an actual medical certificate) via a dedicated website (www.trabajoenconstruccion.com,). Likewise, workers may access the full set of their data and download their certificates, validated by a code.

Enforcement bodies may also verify whether workers meet training requirements via a QR Code.

Interoperability: The card is not interconnected with other national or EU level databases. Workers may submit employment records, contracts or payslips to prove work experience.

Anti-fraud measures: The TPC includes a unique identification number released by FLC and a hologram to prevent forgery.

Concluding remarks

Since its introduction, about 700,000 TPC cards have been issued, with social partners viewing it as a valuable tool for improving transparency, professionalism and safety in the sector. The card also helps avoid duplications in training when workers change jobs, as employers access reliable information on attendance of compulsory OSH courses. Finally, by validating their CVs, workers can more easily access new employment opportunities.

Some challenges remain, such as the time needed to verify training records. To address this, social partners are exploring the use of blockchain technology to streamline verification processes. Additionally, the number of issued cards is declining and social partners are considering future innovations to increase the card's value.

SWEDEN

Overview

- **Name of the card:** ID06
- **Status:** In operation
- **Issuance:** Centralised
- **Issuing authority:** ID06 AB
- **Main stakeholders involved:** N/A
- **Validity:** 5 years (with exceptions)
- **Participation:** Compulsory
- **Costs supported by:** Employers
- **Applied to posted workers:** Yes
- **Sector:** Construction and (not compulsorily) other sectors
- **Objective:** To combat undeclared work; to check construction site access; to identify workers and employers on the construction site; to improve compliance and evidence of health and safety training; to provide evidence of training and work experience
- **Data accessibility:** Visual, QR code, digital
- **Data storage:** Yes

Purpose

The purpose of ID06 is to foster fair competition and to tackle undeclared work by developing and offering IT systems, digital infrastructure, IT-based research and analysis services and other resources for businesses, social partners and government agencies. To this aim, the card is actually released upon validation of supplied information and stay valid as long as infringements do not occur. In the light of its manifold facets and services, the card also supports recognition of workers' experience and training, mainly serving the purpose of improving OSH standards, but also relevant to improve functioning of the labour market.

Background

Context: The ID06 system was introduced in 2007 by seven trade associations requested by the government to increase transparency in the construction sector. Initially, the card was promoted by main contractors as a tool to check worker compliance and identify employees on-site, as the construction sector was facing issues related to undeclared work and unfair competition.

The use of the card expanded significantly after 1 January 2016, when the Swedish government introduced a law mandating the electronic registration of workers on construction sites. This law requires employers to notify the beginning of new construction activities to the Swedish Tax Agency and to keep a record of employed staff. The ID06 system meets the requirements for electronic personnel registration, as outlined in Chapter 9, Section 5 of the Tax Procedure Ordinance (2011:1261).

Since 1 October 2016, ID06 has operated as a private company, ID06 AB, currently owned by eleven trade associations across different sectors, including construction, transport, cleaning, security and others.

Legal aspects

Legal basis: The ID06 card is supported by the collective agreement in the construction sector and is mandatory for companies that are members of the Swedish Construction Federation. Article 10 of the collective agreement allows unions to access information on workers' wages and hours worked to ensure they receive the correct wages. Employers must provide data stored in the ID06 system or an equivalent system, upon request, including for workers posted to Sweden.

Scope of application: The supply of the card to workers (including posted workers) applies mandatorily for all members of the Swedish Construction Federation (*Byggföretagen*) and is almost mandatory in the collective agreement for the construction sector (see the previous section). The card is used on a voluntary basis in other sectors (transport, cleaning and security among others).

As far as construction is concerned, the card applies at construction site level

Validity: As a rule, the card is valid for 5 years. In the case of EU and third country nationals, this ranges from 1 month to 5 years, depending on their work permits and taxation rules.

Data protection and compliance: Data collection and processing for ID06 are mostly based on the 'legitimate interest' of increasing security and combating undeclared work. Workers maintain control over data related to training, health certifications and personal contact information. Data are shared with public authorities, such as the Swedish Tax Agency, for validation and to ensure compliance with tax laws. Data on education, training and health certificates are kept as long as the worker does not request cancellation, while most other data are retained for the card's validity period plus three years after it expires.

Other relevant information: All companies and employees that wish to use the ID06 system or obtain an ID06 card must go through a validation process.

ID06 AB verifies the company's status, the presence of an employment relationship with workers for which it requires a card, the A1 certificates, as well as that third country workers have a valid EU residence permit before releasing the card.

Once a card is issued, further checks may lead to suspension, for instance in case of irregularities with taxes or if a posted worker works in Sweden for more than six months over a year without registering to pay taxes there, in violation of bilateral tax agreements.

For training, data are supplied directly by training providers, accredited at ID06 AB and undergoing periodical audits.

Technical aspects

Card issuance and data management: The employers or self-employed individuals purchase the card through accredited providers. Costs include an initial setup fee and annual fees for each card.

Available data: The card shows the worker's name, photograph, current employer and card number. The card also tracks site entries and exits and records training certifications, such as OSH training or work permits. This information can be used for site access management.

Data accessibility: The data can be accessed by scanning the QR code, allowing quick checks on validity and compliance. Contractors, social partners and public authorities, including the tax agency, can also access a dedicated platform where data and statistics from cards' use to help the monitoring of compliance with working hours, taxes and other contractual obligations.

Interoperability: The Swedish Tax Agency receives data from ID06 electronic personnel register for the purposes of ensuring compliance with payment of due taxes on the basis of the tracked working time. Banks can also use the ID 06 system to assess companies' compliance before making financing decisions.

Anti-fraud measures: The card includes a QR code, used for verification. Users (both companies and workers) undergo identity validation during registration.

Concluding remarks

Since its introduction, approximately 745,000 ID06 cards have been issued, indicating widespread adoption. The card has helped improve transparency and compliance within the construction sector, addressing issues related to undeclared work and tax avoidance. Social partners view the system positively, though concerns remain about ensuring data security and managing costs for smaller firms.

The system's impact has been significant in increasing accountability and streamlining compliance processes, but continuous updates and improvements are necessary to maintain its effectiveness. Future developments may include expanding its use in other sectors and integrating new technologies to further simplify compliance and enhance transparency.

Comparative analysis
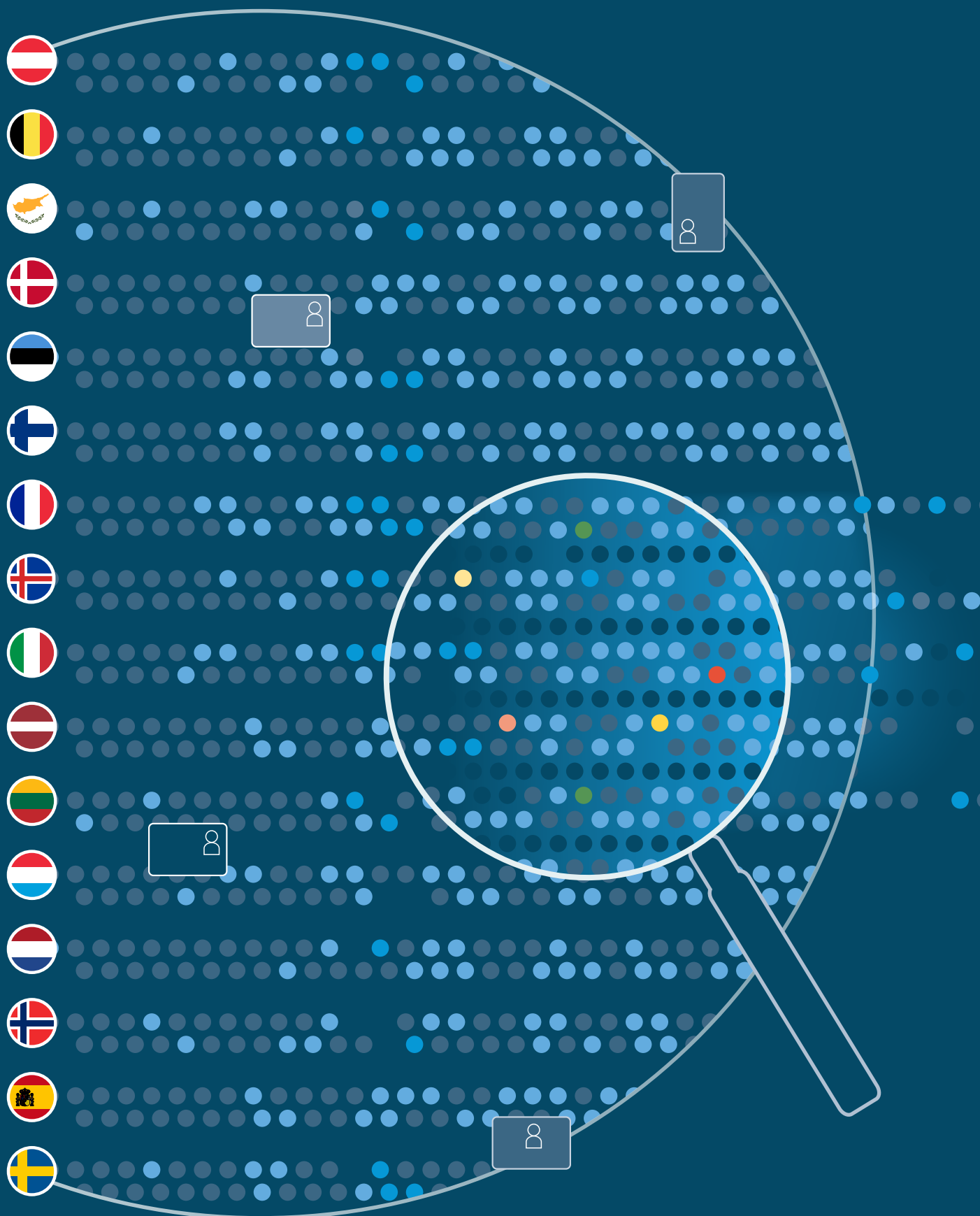
The mapping study considered 19 social ID card schemes (15 operational and 4 under development)[1] across 17 countries in the European Economic Area (refer to Figure 1). The map below provides an overview of the distribution and development status of social ID cards within the construction sector across the EEA. The presence of these cards in countries such as Austria, Belgium, Denmark, Estonia, Finland, France, Iceland, Latvia, Lithuania, Luxembourg, Norway, Spain and Sweden highlight a widespread adoption of this identification system, particularly in Northern and Western Europe.

Countries like Cyprus, the Netherlands and Romania are currently developing social ID cards for the construction sector, signalling a growing trend towards adoption in Southern and Eastern Europe. Italy records the presence of two systems: one operational, which is used for basic identification without link to databases for verifying information and another under development promoted by Italian social partners (CIPE).

Additionally, without pretention to provide an exhaustive coverage of local experiences, the mapping covered some experiences of social ID cards developed at local level in Italy and Denmark, initiatives which seem to answer particular interest by local stakeholders and to remedy the absence of sufficiently developed country-wide tools.

Legal basis

Social ID card schemes across Europe have various legal foundations, often reflecting the structure and priorities of national labour markets and regulatory systems. The majority of schemes (12 out of 18) are embedded in national legislation, making them compulsory for workers in the relevant sectors. For instance, the French Carte BTP and Norway's HSE card are both mandated by national laws aimed at improving safety and compliance on construction sites. These legally enforced schemes typically cover all workers in the sector, including posted workers and are compulsory for ensuring compliance with labour, safety and tax regulations.

In contrast, some schemes, like Belgium's Construbadge and Italy's CIPE, are based on collective labour agreements (CLAs), giving social partners a central role in their management. These schemes may not be legally com-

pulsory but often become de facto mandatory through widespread adoption by companies or as requirements in certain projects or by sectoral agreements. In countries like Iceland and the Netherlands, there is a hybrid approach where national laws interact with CLAs, creating a regulatory framework that covers both statutory and collectively agreed provisions. This is particularly useful for regulating posted workers and ensuring compliance with occupational safety standards.

Other schemes, such as Denmark's Copenhagen municipal card or Lithuania's STATREG, are based on agreements between employers, municipalities and social partners, showing how local or sector-specific initiatives may be preferred, complement or fill gaps in national legislation. Overall, schemes rooted in law tend to mandate compulsory participation, while those based on collective agreements or local initiatives are often voluntary but still widely used in practice.

Issuance

Most schemes (14 out of 17)[2] use a centralised issuance system, where one designated authority, typically a government body or social partner institution, is responsible for issuing the card and overseeing the management of its associated data. In several countries, such as Spain, Belgium, Austria or Italy, this responsibility falls to paritarian institutions who play a crucial role in ensuring fair practices within the construction industry. This reflects the strong involvement of social partners in these countries. In other cases, like Norway's HSE Card and Estonia's Unified Worker Card, issuance is handled by labour inspectorates or national social insurance agencies, where the primary goal is ensuring regulatory compliance and improving worker safety.

Decentralised issuance is found in four of the reports (Latvia, Italy – for the identification tag –, Iceland and Denmark) where the issuance and printing of the card is the responsibility of the employer. Thus, each construction company or main contractor is responsible for providing their employees with a card.
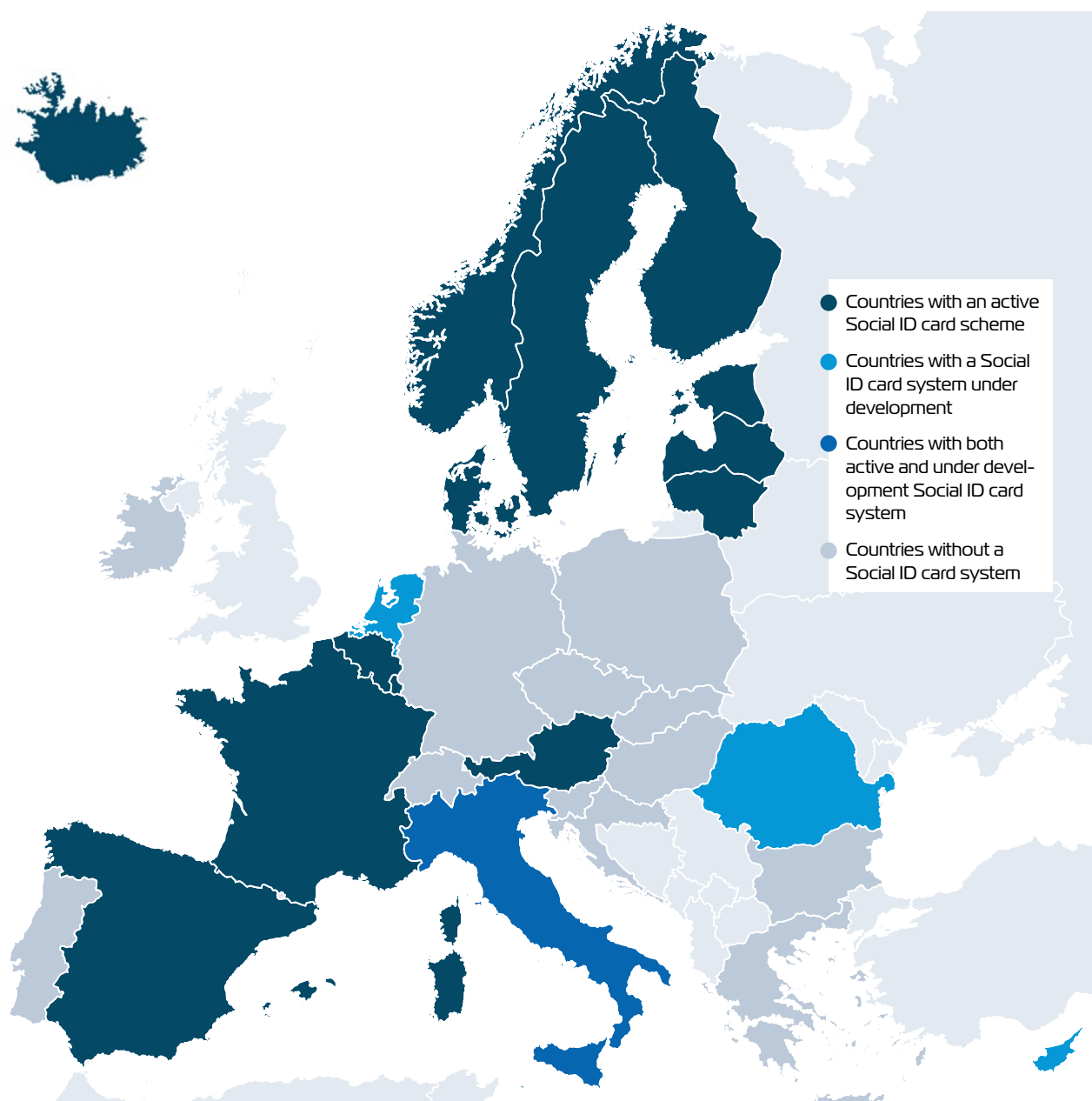
Scope of the cards
The primary focus of most social ID card schemes is to combat undeclared work and ensure the clear identification of workers and employers on construction sites. These schemes typically aim to regulate

1   These numbers include Romania which has a card under development. However, despite evidence of concrete proposals and debate on the possible introduction of a social ID card in Romania, it was not possible to collect sufficient data, therefore the country is not included as part of the country reports detailing features of operative and under development cards with sufficient information for examination.
2   Issuance information is not available for the Dutch card, as this aspect is still subject to discussion. Therefore the Netherlands is not taken in consideration in the chart below.

Legend:
- Countries with an active Social ID card scheme
- Countries with a Social ID card system under development
- Countries with both active and under development Social ID card system
- Countries without a Social ID card system

access to construction sites, verify workers' training and qualifications and monitor compliance with OSH regulations. For example, cards like the Lithuanian STATREG, Finland's Valtti card and Sweden's ID06 offer robust functionalities through their digital infrastructures, allowing the tracking of training, work experience, site access and worker identity in real-time.

In several cases, such as Spain's Tarjeta Profesional de la Construcción, the card is primarily used to verify OSH training and professional qualifications. Similarly, Italy's CIPE card aims to ensure workers' training and safety compliance. In contrast, Norway's HSE Card

and Austria's BauID Card are focused on identifying workers and companies involved in construction work, helping authorities monitor compliance with labour and tax laws.

Certain schemes, such as those in Luxembourg and Denmark, also extend their functionality to include social security and tax compliance, ensuring that both local and posted workers are fully registered and working legally.

Types and functions of social ID cards
Social ID card schemes fall into three main categories: training cards, badges and social cards:

Figure 2 Overview of legal bases of Social ID Cards

● Law ● Collective Agreement (CA) ● Both ● Other
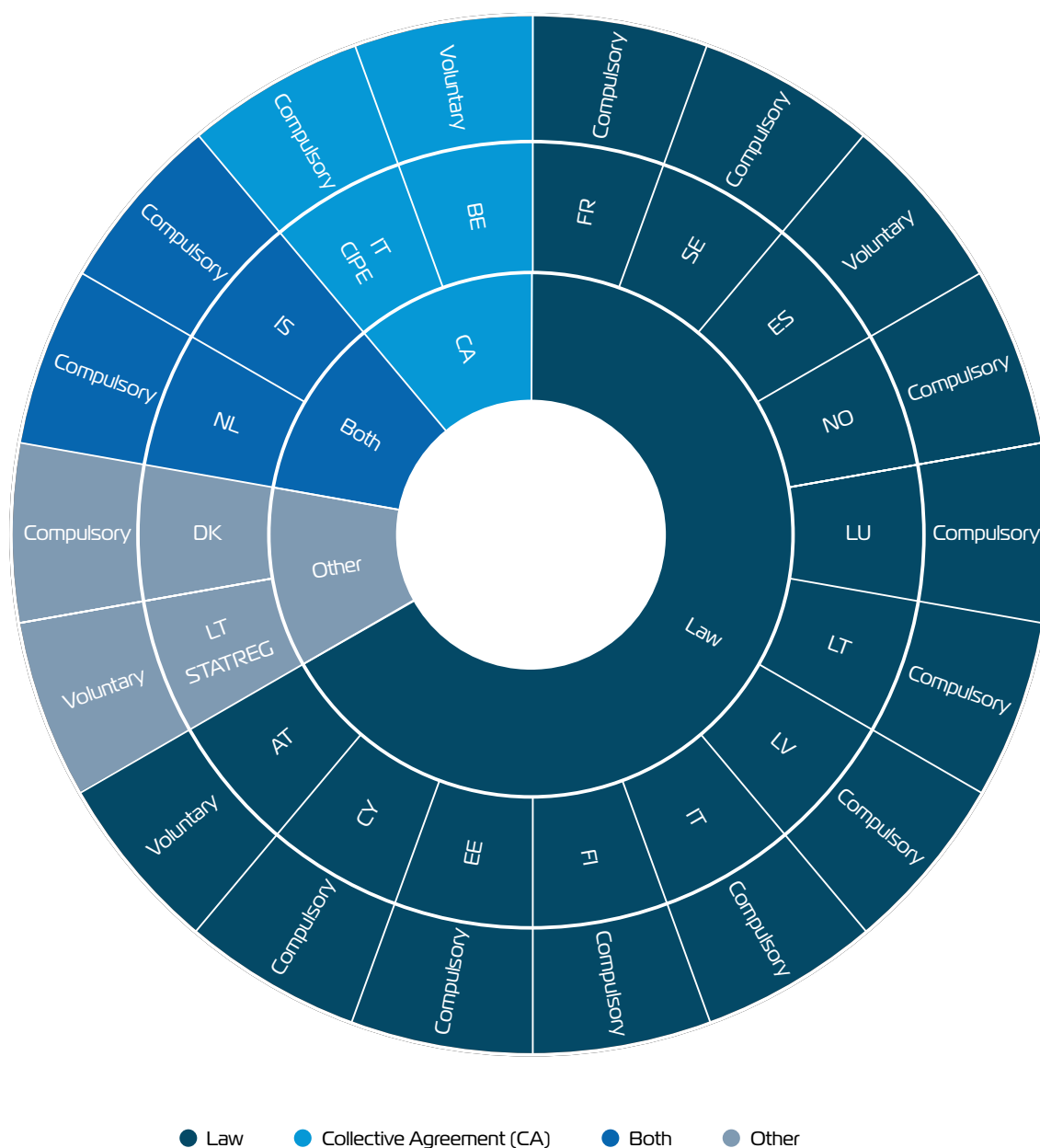
1. **Training cards**
   Used to verify OSH training and vocational qualifications. They are found in countries such as Denmark, Finland, Spain and Lithuania. These cards are often compulsory in construction but voluntary in other sectors.
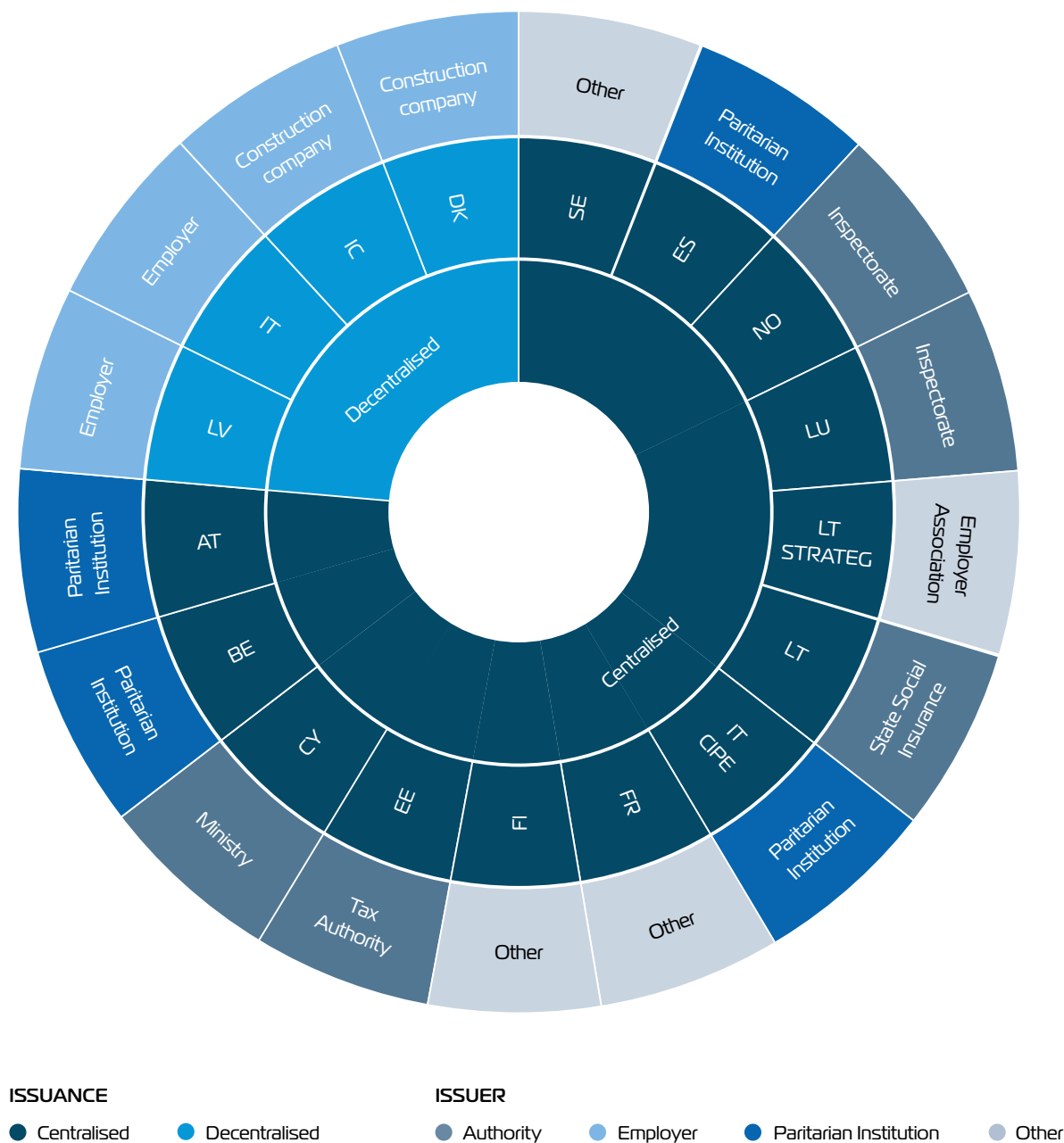
2. **Badges:**
   Primarily used for the identification of workers and monitoring their presence on construction sites. They are compulsory in countries like France, Estonia and Latvia and they often cover posted workers and the self-employed. Some 'badges' can also be used to record working time and site access, as is the case for France's Carte BTP and Lithuania's STATREG.

3. **Social cards**
   This type of ID provide broader information on a worker's identity, employment status and, in some cases, tax and social security contributions (as in the case of Finland's Valtti card), These are mandatory in some cases cover posted workers but not those registered as self-employed, as is the case in Austria and Norway, as well as Luxembourg, where the card is used exclusively for posted workers. These cards play a key role in ensuring compliance with labour laws and collective agreements.

Figure 3 Overview of Social ID Cards by issuance level and type of issuer

ISSUANCE
● Centralised ● Decentralised

ISSUER
● Authority ● Employer ● Paritarian Institution ● Other

Data accessibility

Data stored on these cards may be accessed in a variety of ways. Visual identification is commonplace, facilitating quick verification of a worker's identity and employer details on-site, although systems in countries like Lithuania rely more heavily on digital access. QR codes and barcodes are used in several countries, including France, Estonia and Spain, enabling inspectors and contractors to quickly access more detailed information about a worker's qualification and status. Online platforms are available in many countries, allowing authorised users to check data, such as train-

ing records or employment history, often with different levels of access depending on the permissions granted by the individual checking the information. The card acts as a 'gateway' to comprehensive databases, tracking worker activity across construction sites, in some cases such as in Austria, in Estonia and in Sweden.

Data storage and management

Data management of the information accessible on the cards in different ways. In Austria and Spain, for example, the cards act as a direct source of verified informa-

tion, particularly regarding workers' qualification and training records. Others, like Norway's HSE card and Sweden's ID06, are linked to external databases, allowing for real-time information on compliance with OSH and/or tax regulations. The STATREG system in Lithuania, is an example of a scheme which combines both a direct data source and access to wider databases.

Cards used for tracking site access provide aggregated data on working hours and site presence, which can be used for compliance checks and project management. This is the case in Sweden and Finland.

Comparative analysis

Conclusions
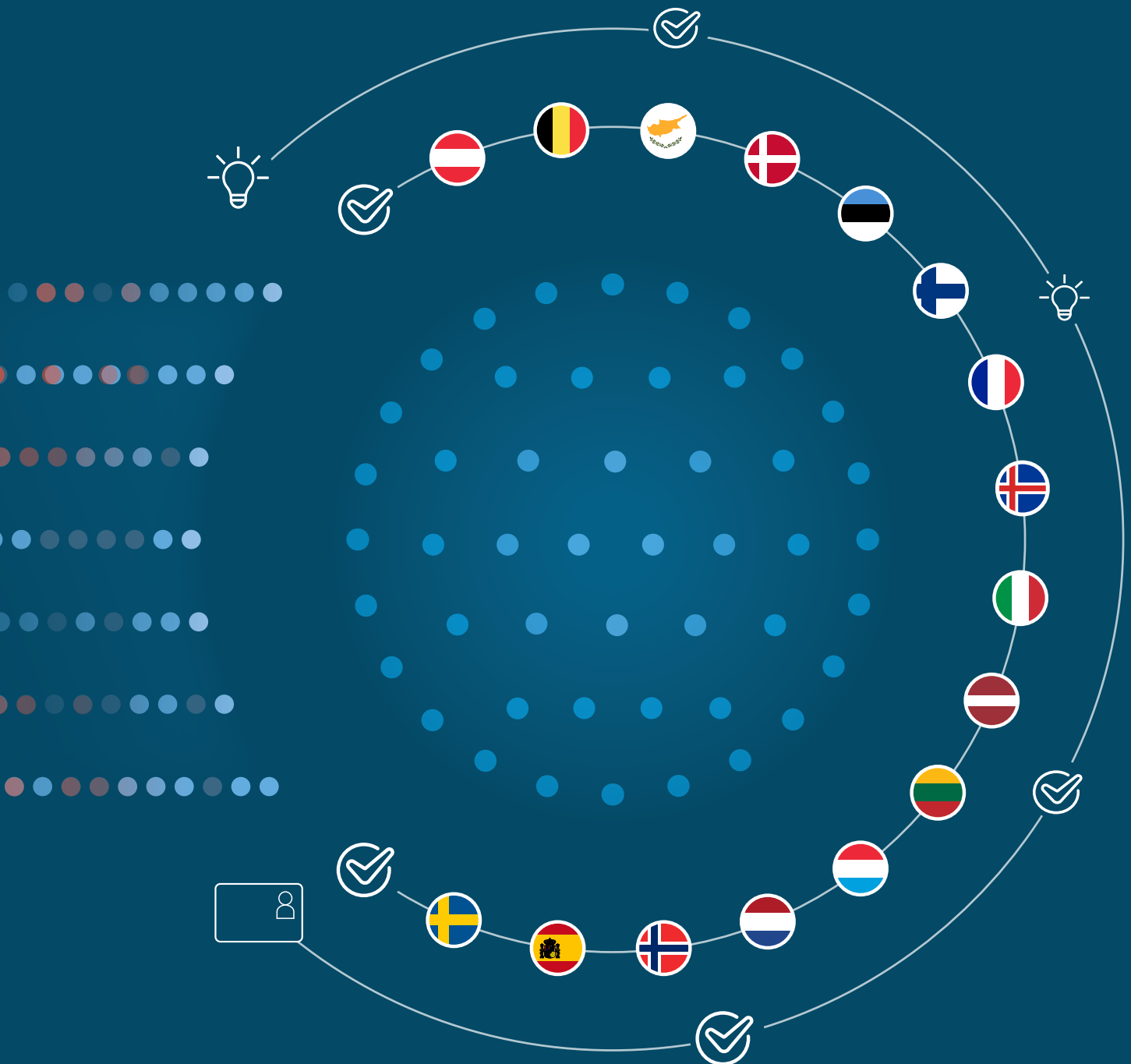
The schemes examined reflect both the diversity in national legal frameworks and the shared goals of improving transparency, safeguarding workers' rights and ensuring compliance with labour and occupational safety regulations. This conclusion brings together the key findings from the country reports and the comparative analysis, focusing on the trends, similarities, differences and future potential of social ID cards in the European construction industry. This conclusion will also address the role of social partners, the variety of legal frameworks supporting these schemes, the kinds of data stored and the prospects for future interoperability between the systems.

Across all the 18 schemes examined, the primary objective is to combat undeclared work and to ensure that workers on construction sites are properly registered, making it more difficult for employers to engage in illegal employment practices or to avoid paying social contributions. France's Carte BTP, for example, mandates that all construction workers, including posted workers, carry the card to ensure that their employment status is properly documented. The Valtti card in Finland is widely used to comply with national identification requirements for construction sites, helping to prevent the exploitation of undocumented or undeclared workers.

In Norway, the HSE Card (HMS-kort) serves as both an identification tool and a mechanism for reducing undeclared work, with strict requirements for workers in the construction and cleaning sectors to be registered and carry the card at all times. The BauID card in Austria also operates with the primary goal of ensuring that all workers on construction sites are properly registered, contributing to a transparent and legally compliant work environment. Even in countries where a scheme is still under development, such as the BouwplaatsID in the Netherlands and the social ID card in Cyprus, the primary aim is to tackle undeclared work and ensure that workers' employment status is transparent and verifiable.

Many of the schemes aim to improve health and safety standards in the construction industry. Spain's TPC is a notable example, serving as a certification tool for workers who have completed mandatory OSH training. This card allows the verification of whether a worker has the necessary qualifications to perform specific tasks, which not only improves safety on construction sites but also ensures that workers are properly trained for the roles they undertake. The ID06 card in Sweden similarly tracks workers' qualifications, including OSH training, ensuring that only properly qualified individuals are permitted to work on construction sites.

Support and the role of social partners and paritarian institutions

Support for these card schemes varies across countries, but there is general agreement among stakeholders that they are valuable tools in improving transparency and compliance in the construction sector. Countries like Norway, Sweden and France have implemented compulsory systems that enjoy broad support from both employers and trade unions, largely due to their role in combating social dumping and ensuring workers' rights. These schemes are often backed by strong enforcement measures, including fines and penalties for non-compliance, as seen with the HSE Card in Norway and the Badge Social in Luxembourg.

In other countries, support is more variable. In Italy, for example, while the Tessera di riconoscimento is required by law, the CIPE card, which focuses on qualifications, is still under development after introduction in collective agreement. Similarly, the BouwplaatsID in the Netherlands has been slowed by privacy concerns and disagreements between the government and social partners about its scope and use.

Support of the social partners is often required for the development of these cards as they have been involved in the development and implementation of social ID card schemes across the schemes examined. The involvement of social partners and the relevance of collective agreements is also reflected in four card schemes (Austria, Belgium, Italy and Spain) which are managed and issued by sectoral paritarian funds following a mandate of social partners. A similar experience was also encountered in France, where the Carte BTP is managed by the sectoral fund established only by French employers' organisations and therefore cannot strictly be considered paritarian. In Belgium, for example, the Construbadge was developed through collaboration between employers and trade unions in the construction sector, with the goal of improving transparency and safety on construction sites. Spain's TPC, for instance, was developed by the FLC, a paritarian institution in the construction sector. The FLC not only manages the issuance of the card but also ensures that workers have completed the necessary OSH training, reflecting the joint efforts of social partners to ensure compliance with safety regulations. Also, the newly introduced Austrian card, the BauID (2023), is managed by the sectoral paritarian fund BUAK. However, despite being spearheaded by sectoral social partners, this tool is embedded in Austrian law under the BUAG Act.

The ID06 system in Sweden initiated as a response of business associations to concerns on undeclared work

largely benefitted from its inclusion in collective bargaining. Today, the widespread adoption of the ID06 card is not only used in construction, but also in sectors such as transport and cleaning, demonstrating both the success of the card as well as the benefits of social partner cooperation in the adoption of such schemes.

However, the role of social partners is not limited to the introduction of cards via collective bargaining as happens in Luxembourg, where the Badge Social was introduced following consultations between the government and social partners.

Similarities and differences

While the schemes share many common objectives, there are several key differences in their implementation and scope. One major difference lies in whether the schemes are compulsory or voluntary. Countries like France, Sweden and Norway have made their card schemes effectively mandatory, while in the Lithuanian STATREG and the Spanish TPC card remain voluntary, though encouraged. This has an impact on uptake and the overall success of the schemes in achieving their goals.

The types of data stored and the level of digital integration also vary widely in the reports. For example, Latvia and Estonia rely heavily on digital systems that track working hours on a daily basis. Belgium's Construbadge and Austria's BauID are more focused on physical cards with minimal data storage and schemes active in Iceland and Italy represent physical badge with minimal or no integration in digital platforms. Similarly, some schemes, like Belgium's Construbadge and the ID06 in Sweden, are highly interconnected with other national systems, including tax authorities, while others remain largely standalone tools.

Another key difference is the breadth of sectors covered by these schemes. While most schemes are limited to the construction sector, some, like the HSE Card in Norway and ID06 in Sweden, have expanded into other sectors such as cleaning and transport. This expansion reflects the flexibility of these systems and their potential to be adapted to other industries with similar challenges.

Potential for interoperability

The potential for interoperability between these schemes is an important aspect in the context of the SIDE-CIC project, particularly for posted workers moving between different countries. While most schemes are limited to national use, there is growing interest in cross-border cooperation. Lithuania's STATREG system, for example, has explored linking with other Nordic countries and Sweden's ID06 has been used as a model for other European schemes. Estonia's Unified Worker Card also shows potential for integration with other countries' systems.

However, significant challenges remain in achieving full interoperability. These include differences in the types of data stored, the legal frameworks governing each scheme and concerns around data privacy. Furthermore, card schemes established on a voluntary basis cannot guarantee full coverage of workers' information.

An investigation into the feasibility of interconnectivity between these schemes will be explored in the later stages of the SIDE-CIC project, aiming to identify the legal and technical opportunities and obstacles for cross-border data sharing and system integration.

Final remarks

The mapping of social ID cards in the construction sector across the European Economic Area reveals a diverse but, nonetheless, converging landscape. While each scheme is tailored to meet the needs of its national context, social ID cards are a recognised tool to: improve transparency, ensure compliance with OSH regulations and protect workers from exploitation and undeclared work. Social partners have played a vital role in the development and implementation of these schemes, ensuring that they reflect the needs of both workers and employers. As these systems continue to evolve, there is significant potential for greater collaboration and interoperability across borders, enhancing the effectiveness of these schemes in a more integrated European labour market.

While there are clear benefits to these schemes, challenges remain. Ensuring full compliance, particularly in countries where the schemes are voluntary, is difficult. Privacy concerns also need to be addressed, particularly in cases where large amounts of data are stored. However, with growing interest in cross-border interoperability, there is potential for these schemes to evolve into a more interconnected system that can better protect workers and ensure fair competition across Europe.

The continued support of these schemes and their potential for interoperability will depend on the ability of governments, social partners and businesses to col-

laborate effectively and address the challenges that remain. As labour mobility increases and the construction sector continues to evolve, these card schemes will play an increasingly important role in ensuring transparency, safety and fairness in the workplace.

Conclusions

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