Posting of Workers User Guide for Requests for Information & Sending documents

Document revisions

Date	Version number	Document changes
04/07/2017	0.1	Initial draft

Posting of Workers   USER GUIDE

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1. Introduction

In 2011, a pilot project was launched to trial the use of IMI for information exchange between the public authorities responsible for monitoring the terms and conditions of employment of posted workers, under the **Posting of Workers Directive 96/71/EC**.

Following a three year trial period, and a positive evaluation, the use of IMI for the Posting of Workers Directive was formalised in provisions of the **Enforcement of the Posting of Workers Directive 2014/67/EU**.

The Posting of Workers Enforcement Directive aims to improve the implementation, application and enforcement of the Posting of Workers Directive. IMI plays a key role in supporting the strengthened administrative cooperation underpinning the Directive. General principles for mutual assistance are described in Article 6 which also introduces legal deadlines for replying to information requests. Article 7 describes the roles of the host Member State and the Member State of establishment in the framework of administrative cooperation.

To help ensure enforcement, Chapter VI of the Directive foresees mutual assistance between authorities, where needed, to notify decisions and recover administrative penalties and/or fines, through what is referred to as a Uniform Instrument generated via the IMI system.

The collection of mutual assistance provisions of the Posting of Workers Directive and the Enforcement Directive have been implemented in IMI through **4 different modules:**

	Module	Legal basis
1.	Posting of Workers Request	(96/71/EC Article 4 & 2014/67/EC Articles 6, 7 and 10(3))
2.	Communication of Irregularities	(2014/67/EC Article 7 (4))
3.	Requests to notify a decision imposing a penalty and/or fine	(2014/67/EC Chapter VI)
4.	Requests to recover a penalty and/or fine	(2014/67/EC Chapter VI)

This guide outlines how to use the first two modules, a second guide will cover the modules for requesting notification and recovery of penalties and/or fines. You may have access to all or just some of these modules, depending your authority's competencies.

> ➢ **All Posting of Workers forms** have broadly the same structure. This means that you can open any existing request, and copy the content into a new form of any type, provided you have access to the relevant module.

2. The Posting of Workers Request module

2.1. About the module

The Request module is the main module for administrative cooperation under the two Posting of Workers Directives. It supports mutual assistance by allowing an authority in one member state to request information or assistance from an authority in another Member State. Following the introduction of the Enforcement Directive, the request module has been restructured and extended to incorporate new obligations. It now offers a total of 5 request forms:

1) Urgent requests
2) Requests concerning a Posting
3) Requests concerning Health and Safety
4) Requests concerning Working Conditions
5) Requests to send documents to a service provider

The first form listed above, the **urgent request** form, is a new form for checking the establishment of a service provider in another Member State (Article 6 (6)(a)).

The forms for information **requests concerning a Posting, Health and Safety** and **Working Conditions** reflect the original information request form, split into three. This should make it easier to find the relevant questions, and reduce the total number of questions in any one request. The questions are based on the Terms and Conditions of Employment outlined in the Posting of Workers Directive, Article 3, supplemented with further questions arising from the Enforcement Directive.

The fifth form, the **Request to send documents,** is also a new form which facilitates the sending of documents referred to in Article 6 (3) of the Enforcement Directive.

If you have access to the Posting of Workers Request module, you will find all five forms under the **menu option -> Requests (new forms)**

2.2. Urgent requests

Urgent questions concerning the establishment of a service provider

The Enforcement Directive (Article 6 (6)(a)), allows an authority to request information, as a matter of urgency, concerning the establishment of a service provider that has posted workers to its territory.

The Urgent Request form is solely for cases of urgency and authorities should be able to respond to these enquiries based on information available in their national registers.

Confirming and justifying the urgency

When sending an urgent request, you must first confirm that it is indeed urgent and **clearly indicate the reason for the urgency** in a free text box, including some details to substantiate the urgency.

> ➢ You should only use this form in case of <u>justified</u> urgency.

Deadlines for Urgent Requests

The text of the Enforcement Directive sets a maximum deadline of **2 Working days** for answering urgent requests. However, the IMI system works on a calendar day basis, and does not take account of weekends and holidays in different counties.

- ➢ When **sending** a request, you need to indicate the **number of calendar days in which you require an answer**.

- ➢ When **accepting an incoming urgent request**, you need to indicate the **number of calendar days in which you expect to provide a reply**.

- ➢ In both cases the system allows you to specify **up to 5 calendar days.** This is intended to allow for weekends and holiday periods such as Easter.

> ➢ According to the Enforcement Directive, the recipient of an urgent request must answer as soon as possible and up to a maximum of 2 working days**.**

2.3. Requests concerning a posting

Questions about a posting

This form allows you to request information about a specific posting, when workers have been posted to the territory of your Member State or when a company established in your Member State has posted workers to the territory of another Member State.

When sending an information request about a posting you can select from questions which are presented in four categories:

1) questions about a posting company;
2) questions about posted workers;
3) questions about the nature of a posting (start date, end date, …); and
4) questions about attached documents.

The questions were originally drawn up for the Posting of Workers pilot project and are based on the Posting of Workers Directive Article 3. Some new questions arising from the Enforcement Directive have been added.

Article 4 of the Enforcement Directive describes how authorities shall make an **overall assessment** to determine a genuine posting and to prevent abuse and circumvention. At the request of the Posting of Workers experts, questions addressing the different elements to be taken into account when making an overall assessment are identified with references to Article 4 and are placed at the top of each of the question lists in this form.

> ➢ When sending a request, take care to select only the required questions in order to avoid placing any unnecessary burden on the responding authority**.**

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Motivation for the request

The requesting authority is required to provide a motivation for each information request by selecting from a pre-defined list of motivations. This is to ensure that requests for information relate to a specific posting.

> ➢ You should only use this form to ask questions relating to an actual posting.

Deadlines for (non-urgent) information requests

The text of the Enforcement Directive sets a maximum deadline of **25 working days** for answering information requests. However, as already noted in the section 2.2, the IMI system works on a calendar day basis, and does not take account of weekends and holidays in different counties.

> ➢ When sending a request or accepting an incoming request, **you need to indicate the number of calendar days** in which you need a reply or the number of calendar days in which you expect to provide a reply.

> ➢ The system allows you to specify **up to 35 calendar days** – the equivalent of 25 working days.

> ➢ According to the Enforcement Directive, the recipient of a posting of workers information request must answer within 25 working days (35 calendar days) unless a shorter time limit is mutually agreed with the sender.

2.4. Requests about Health and Safety

Using this form, you can ask questions about **health and safety measures** relating to a specific posting as well as about the circumstances surrounding a specific **occupational accident**. The questions in this form were drawn-up and approved by the Senior Labour Inspectorates Committee (SLIC).

When creating a request about health and safety, the sending authority is asked to indicate whether the request concerns an accident. If yes, any known details of the accident such as date and location must be provided.

As in 2.2 above, a motivation must be provided and the same maximum deadline of 35 calendar days applies.

2.5. Requests concerning working conditions

This form covers questions about applicable working conditions. The questions are presented in 7 categories. Requests may contain one or more questions from any of the different categories. For many of these questions, the answers provided by the responding authority may prompt further **sub-questions**.

For example, for the following question under the category on **Work Periods and Rest Periods** (**Working Hours)**:

'[F213] Is there a rule on the minimum rest period in your Member State?'

If the answer provided is **yes,** the following questions are presented:

-> How is the rest period calculated?

-> In general what is the minimum rest period in hours?

Many of the questions on working conditions offer the responding authority a choice of answers in a dropdown list. For example, for the following question under Rates of Pay:

'[F403] On what basis is the remuneration calculated?'

The respondent is presented with a choice of:

> *on a daily basis*
> *on a weekly basis*
> *on a bi-weekly basis*
> *on a monthly basis*
> *on a yearly basis*
> *other, as specified below*

These pre-defined answers provide the requesting authority with a clear and definitive answer in their own language. Where pre-defined answers are provided, a supplementary free-text field is also offered for further clarification.

2.6.   Request to send documents

The form to request an authority in another Member State to send documents has the same structure as the other posting of workers request forms except that, in place of questions, the sender asks the recipient to send one or more attached documents to a service provider on its behalf.

Justification

As with all other requests, the sender must provide a justification for the request.

Deadlines for the sending of documents

There is no legal deadline for these requests. For practical reasons, **a deadline of up to three months** can be specified.

Possible responses

When responding to a request to send documents, you are presented with a choice of pre-defined replies:
- ☐ *We sent the document(s) to the service provider*
- ☐ *The service provider is undergoing insolvency proceedings. Therefore we delivered the document to another organisation*
- ☐ *We could not send the document(s) to the service provider*
- ☐ *We will not send the document(s) for the reason below*

Each answer will require further details to be provided. For example,

✓ *'We could not send the document(s) to the service provider'* presents:

For the following reasons:
- ☐ *The service provider could not be located*
- ☐ *The service provider is not established in our Member State*
- ☐ *The service provider no longer exists*
- ☐ *Other reasons explained below*

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3. Handling Posting of Worker requests

With the exception of the Request to send documents, all of the request have the same structure, with details about:

> a) the request (motivation, due date, selected recipient)
> b) the posting company
> c) the posted workers
> d) questions & answers
> e) messages and supporting documents and
> f) system generated information know as management information.

The 'Request to send documents' does not include details about posted workers and in place of questions and answers includes the request to send attached documents to the service provider.

A request can be sent or answered by users with access to the request module and with 'handler' rights.

All five forms under the Posting of Workers Request Module can be created and consulted under the menu option **'Requests (New Forms)'**.

> Requests which **require an action** on the part of your authority are **listed on your 'Dashboard'**.

3.1.   Preparing a draft request

A new request can be created via the menu option:

> **'Requests (New Forms)' -> 'Create request'**

The five Posting of Workers request forms will be listed as well as others depending on your access rights.

Like all IMI exchanges, requests are entered and displayed across a series of tabs or screens. When creating a new request, you must provide all the mandatory data on one screen, before you can proceed to the next screen. Mandatory data is denoted by a red asterisk.

If you try to advance to the next screen without providing mandatory data, or if data fails validiation checks, **error messages are displayed in a panel on the top left** of the screen and the fields in error are highlighted in red. **You can close and reopen the list of errors** if they obsure your view of the screen.

Step1 Motivation, due date and responding authority screen

- The very first step when creating any request is to indicate the **motivation or justification** for the request. This may take the form of a free text field or a list of pre-defined motivations, or even both, depending on the form at hand. Asking the sender to provide a motivation for sending a request helps ensure that it is being sent within the relevant legal framework.

- To establish a due date for the request, the sender needs to enter the **number of calendar days in which a reply is needed.** The responding authority should take account of this, when it records the number of days in which it expects to provide a reply. The number days indicated by the responding authority determines the eventual **due date** for the request.

> The maximum deadlines and related legal obligations for each form are outlined under Section 2.

- Next you need to **select** the **responding authority**. Click on the **'search'** function and enter search criteria: select the country to which the request should be sent and specify any other known criteria such as part of the name or the town. Alternatively, simply select the country and press search. The system presents all the authorities matching the specified criteria and with access to the Posting of Workers Request module. If you want to view the details of an individual authority listed in the search results, double click on the relevant row and a new tab will open in IMI showing the full details of the authority. You can then inspect the details to determine whether it appears to be the appropriate authority to respond to your request.

For example: searching for a competent authority in Verona Italy (where there are many authorities responsible for posting of workers)

Select the country 'Italy' and specify the town 'Verona'.

> **If you find that you are unable to determine the correct** responding authority, simply search for an authority in the relevant country with the module role of 'coordinator'. The coordinator will then forward your request to the appropriate authority.

Step 2 Subject of the request

The next step is to provide information about the service provider, the posted worker(s) and in the case of the health and safety requests, details of an accident if relevant.

- For every posting of workers request, **details of the posting company** (service provided) must be provided. Although many fields are optional, it is important to provide as much information as possible, so that the responding authority can easily and reliably identify the service provider.

> Each Posting of Workers request must relate to an actual posting, which is why, as a minimum, details of a posting company (service provider) must be provided.

- If your request concerns one or more **posted workers** the details of the worker(s) can be provided either by entering the details of each worker manually, or, by attaching a file to the request containing the details of each worker, such as a PDF.

Manually entering the details of posted workers (in the **grid** provided)

When **manually entering the details of one or more posted workers**, the details are entered for each worker, and displayed in a grid or list. To manually enter details:

– Indicate that details are provided **'in a grid'**.
– Then click **'add'** in the panel that opens below.
– A row appears numbered '1' and below the panel, fields are presented for the details of the first worker.
– Complete all known details about the worker.
– To provide details about another worker, click **'add'** again and a new row appears in the grid '2' and a set of fields is presented.
– Repeat until you have entered the details of all workers and then click **'Next'**.

You can edit the details of a previously entered worker by clicking on the row in the grid or list. If you click 'add' but do not provide the mandatory details for a worker, an error is displayed. Either complete all the details or remove the row by selecting it in the grid and clicking on 'delete'.

Providing details of posted workers in an attached file

If your request concerns a large number of workers, you may find it easier to simply attach a file containing the details of the posted workers. To do so:

– Indicate that details are provided '**in an attached file'**
– Click on 'add', then 'browse' and identify the file, and click 'save'.

You can check the content of file you attached by clicking on 'download'. If you need to change the file, then 'click' on 'delete' and add repeat the process added the correct file.

- For requests concerning **health and safety**, you are asked to indicate whether the request concerns a specific accident, in which case, you must provide any known details about the accident such as the date and place where the accident occurred.

- For requests to **send documents** there is no option to enter details about posted workers.

Step 3 Selecting questions or requesting the sending of documents

For requests concerning a Posting or concerning Working Conditions

- As there are a large number of questions, they have been grouped into categories to make selection easier. Therefore, for these two forms, you need to indicate the categories under which you want to ask questions.

- If you are not familiar with the categories and questions that can be asked, you may want to consult the lists of questions which are presented on the IMI website1.

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[1] IMI Website (http://ec.europa.eu/imi-net/)

- For each category you select, a new tab will appear listing the possible questions. Click next to move through the tabs of questions.

- If you find you have indicated a question category for which you do not want to select any questions, simply click previous to return to the 'Question types' tab and unselect the relevant category.

Selecting and Unselecting questions

- To select a question, check the box beside the question. A panel will open below the questions list where you can add some details or specifics to the question. If you simply click on a row, the question remains unselected and you will not be able to enter question details.

- To remove a selection, uncheck the box next to the question.

Once you have made a selection from the each of the tabs of questions, you will be able to **'Save'** your request in status '**Draft**'.

In the case of the **Request to send documents** form, instead of selecting questions you are presented with a screen for attaching the document(s) to be sent.

3.2.   Finalising a Draft request

You can edit all information saved in a 'draft' from the motivation through to question selection. The actions offered in this status include:

– **'Delete'** , which will permanently remove your request from the IMI database;

– **'Edit'** , which allows you to step through all of the tabs in the request and modifying or add data, including adding and removing questions;

– You may wish to **add** supporting **documents** to your request, or even **add a message** to the responding authority. You can only do this once you have saved your request as a draft. For more information about messages and attachments see section 3.8.3;

3.3.   Sending a request

When you have finalised your request, click 'Send'.

- If your authority is linked to more than one coordinator for Posting of Workers, you will be prompted to select the relevant coordinator form a list.

- If your authority's requests are subject to approval by the coordinator, the coordinator will be notified via email about the need to approve the request.

- If your authority's requests are not subject to coordinator approval, an email will immediately be sent to the users in the selected responding authority, informing them that they have a new incoming request.

3.4. Modifying or withdrawing a request

Once you have sent a request you will no longer be able to delete or modify it, with the exception of a few fields such as contact details. You can however provide additional information via the Messages and Attachments tab, see 3.8.3 below. If you have made fundamental mistakes in the request, or if you no longer need the requested information**, you can 'Withdraw' the request**. When you withdraw a request you will be asked to provide a justification.

> **Once you have sent a request you will no longer be able to modify or delete it. You can provide more information or corrections by adding a message, or if need be, you can withdraw the request.**

3.5. Handling incoming requests

When your authority receives a new incoming request, request handlers will be notified via **email** and the request will appear on the **'Dashboard'** under the heading **'Requests to Accept'.**

3.5.1. Accepting Requests

It is not possible to see personal details or to open attachments prior to accepting a request. This helps to ensure that personal data is only shared on a need to know basis. If based on the questions asked it is clear that your authority is competent to respond you should **'Accept'** the request without delay. The sending authority will be informed by email that it has been accepted. If you have accepted a request and then realise that it should be handled by another authority you can still forward the request, see 3.5.2 below.

When you accept a request you are asked to enter the **number of calendar days in which you expect to reply.** You should first take account of the number of days in which the requesting authority has asked for a reply as well as the amount of time that has elapsed since the request was sent. The maximum number of days allowed varies, depending on which form is used, details are provided under Section 2 above. The number of calendar days in which you expect to reply will determine the **due date** of the request.

3.5.2. Forwarding Requests

If it is clear that a request does not fall within the competence of your authority, then you should **'Forward'** it to the appropriate authority in your Member State without delay. If the relevant authority is not registered in IMI, then forward the request to a coordinator who should take care of contacting and registering the relevant authority.

You can also forward a request after having accepted it. If you do so, any draft answers or comments that you have entered will be lost.

When forwarding, you will be asked to provide a justification for doing so. Once you have forwarded a request, you will no longer have any responsibility for it. The requesting authority will be informed by email that a new responding authority is now expected to deal with the request.

3.5.3. Splitting requests

If you can only answer some questions in a request, you should either obtain the required information from the relevant authority in your Member State, or, **'Spilt'** the request or send the relevant questions to another authority.

The requesting authority will be informed by email that its request has been split and a new responding authority is now expected to deal with some of the questions.

You might also consider splitting a request into questions you can answer quickly and questions that will take more time, selecting your own authority as the responding authority. This will allow you to reply promptly to some questions and take more time for those that require more efforts.

There is an obligation to provide requested information: if you can only answer some questions in a request, you should obtain the required information from the relevant authorities in your Member State, or, split the request and send the relevant questions to another authority or to a coordinator.

3.5.4. Replying to a request

Once you accept a request, you will be able to view all the details and any attached documents. Questions may be presented on more than one tab depending on the form at hand. When looking at questions, click on the question and a panel will be displayed below showing any free text added by the sending authority.

When you are ready to respond to a request, click on **'Edit reply'**.

To answer a question, click on the question, and a panel will be displayed below the question list. The question is repeated with any free text provided by the sender along with the available answer fields. You will be able to select from pre-defined answers or answer in free text. Some answers may generate further questions.

If you try to **'Save'** the request without answering all questions, error messages will be presented in a panel in the top left corner of the screen and the tabs and unanswered questions will be highlighted in **orange** . You can choose to ignore the warnings and save the request have answers only some questions.

You can also send messages to the sender and add any supporting documents on the tab dedicated to this purpose. See section 3.8.3

For the R**equest to send documents**, instead of answering questions, you need to indicate whether you were able to send the documents or not, by selecting from a predefined list. Please see the specifics for this form under section 2.6.

3.5.5. Sending a reply

When you have finalised your reply, click 'Send'.

- If your authority is linked to more than one coordinator for Posting of Workers, you will be prompted to select the relevant coordinator form a list.

- If your authority's requests are subject to approval by the coordinator, the coordinator will be notified via email about the need to approve the reply.

- If your authority's requests are not subject to coordinator approval, an email will immediately notify the sending authority, informing them that a reply has been sent.

3.6.   Closing a request

As the sender of a request, you will be informed by email when a reply has been provided by the responding authority. A copy of this email will also be sent to the contact email address of your authority. You will find the request on the Dashboard under 'Requests to close'.

You should check the reply and read any free text comments and messages added by the responding authority. The reply may also contain new attachments.

If you included an attachment in your request and asked questions related to it, remember to check the responses (and any comments) provided.

Once you have consulted the reply to your request and are happy with it, you should 'Accept Reply' without delay.

3.7.   Asking for and providing clarifications

If, after consulting the reply to a request, you need some clarifications relating to the answers provided, you can use the **'Ask for clarification'** function. A free text box will be presented where you can ask for clarification.

The responding authority will be notified by email and the request will be presented on the users' Dashboard under **'Requests to answer'**.

As the responding authority, you need to consult the requested clarification under 'Last Actions taken' on the first tab of the request. Click on the row 'Request Clarification' and the panel below will show you who took this action as well as the details of the requested clarification. You can now add free text to further detail the previously provided answers and add supporting documents if necessary. Once you have provided the necessary clarifications click **'Send Reply'**. You may also find it useful to communicate with the sender by adding a message to the request, depending on the case at hand.

> If, as the sending authority, you need **additional information** rather than a clarification, you should 'Accept Reply' and **send a new request** using the 'Copy' function explained in section 3.8.4.

3.8. Other general functions for requests

3.8.1. Translating free text

Any information provided as free text is shown with **speech bubbles** to the right. This text can be automatically translated by a service connected to IMI (MT@EC).

To translate individual free text fields, click on the speech bubbles beside the text and select the desired translation language.

You can also **translate all text** in a request in one step by using the **'Translate all'** function at the top of the screen, which will translate all free text to the language in which you are using IMI (i.e. the session language displayed in the top right hand corner of the screen).

Translations are usually displayed within moments, but there can be a delay, depending on the length of the original text and on the number of fields for which translation is requested.

3.8.2. Printing the details of a request

The full details of a request can be extracted in a PDF document, with or without a digital signature and in any of the 22 languages offered by IMI. If you do not have the right to view the personal details in a request, then the PDF will show asterisks in place of any personal data in the same way as displayed on screen. The generated PDFs are saved under the menu option '**My reports**' for 30 days.

3.8.3. Messages and supporting documents (attachments)

All IMI requests have a tab dedicated to messages and supporting documents (attachments). Messages and supporting documents can be added to requests at any time by both the sending authority and the responding authority up until the point when the request is closed.

Messages are a useful means of communication between the two authorities concerned. As soon as you add a message to a request, the user in the other authority is notified by email. The recipient can for example ask for more details about the service provider or the workers. The sending authority might send a message enquiring about the progress of the request. When you add a message you need to select from a predefined list of message types, and then provide your message in free text.

Supporting documents may also be added at any moment and by either of the two authorities concerned

- When adding a document, try to give it a **meaningful name** indicating the content of the document. As with all free text fields there is a language field which in this case should reflect the language in which you provided the name.
- When uploading a document, make sure you also **select the correct language** for the **document (file)**, that is, the language used in the document. This may be different to the language in which you provided the name.
- Documents may not exceed 10MB in size and some file types such as executable files cannot be uploaded.

3.8.4. Copying a request

As the sending or responding authority you can use the content of one request to create another **request of the same type** by using the **'Copy '** function. This can be useful for example when you need to send a second request concerning the same service provider and posted workers or if you are asking the same set of questions as in a previous request.

When you copy a request, you will pass through the same steps as when creating a request. The data provided in the previous request can be modified and questions can be added or removed.

A competent authority can copy any request it has sent or received and in any status.

3.8.5. 'Reuse data' function

The **'Reuse data'** function is similar to the 'Copy' function, except that it allows you to use the content of one posting of workers request to create a new **request of a different type**. For example, you can open an Urgent Request concerning Establishment to create a more detailed request concerning a Posting or concerning Working Conditions. Depending on your access rights, you may also be able to reuse an information request to create a Request to notify an administrative penalty/fine or vice-versa.

Of course, only the common elements of the two forms can be copied to the new form and any copied data can be modified.

The 'Reuse data' function can be used for any posting of workers exchange and allows you to generate a new exchange for any posting of workers form to which you have access.

3.9. Keeping track of Requests

Requests can be retrieved in three different ways:

1. The **Dashboard** lists the number of requests in each status for which you need to take an action. For example, it will show the number of drafts requests, requests to be accepted, requests to answer and requests to closed. If you click on the number shown, a new tab is presented listing the requests in that particular status.

2. If you receive an **email notification**, indicating that you need to take an action on a request, you can click on the request number in the email and it will launch the IMI login page. Once you login, the request will be displayed immediately. If you are already logged into IMI the request will be displayed on a new tab.

3. If you are trying to locate one or more requests, you can also use one of the two **request searches** under the menu option 'Requests (new forms)'.

   - **Search all requests:** this menu option provides a wide range of criteria which is common to all requests: entry number, request status, due date range, sent date range, etc.

- **Search request per form**: use this menu option when you want to retrieve one or more requests of a certain type, e.g. Requests concerning Working Conditions. This search provides the same criteria as the first search, with the addition of service provider search criteria.

4. Communication of Irregularities Module

This module contains just one form. It allows an authority in one Member State to communicate **possible irregularities and related information**, to another Member State which may be concerned, without undue delay, as foreseen under the Enforcement Directive (Article 7 (4)).

The communication is a 'notification' in IMI terms and is thus presented under the **menu option 'Notifications' .**

When completing the communication, the sender must indicate the type of irregularity from a dropdown list, and in the case of possible irregularities concerning 'Non-respect of terms and conditions of employment in the Host Country' or 'Non-respect of administrative requirements in the Host Country' further lists of are presented.

Like any IMI notification, the communication is sent to all the coordinators in the selected recipient Member State. The recipients can forward the communication to other authorities in the same Member State with access to this module.

Once sent, the Communication will remain open for 90 days, during which time the sender and recipients can exchange messages.

 Requests to notify a decision and Requests to recover a penalty and/or fine Module

A separate guide will be provided for the Recovery of Penalties and or Fines (Uniform Instrument)

5. FOR MORE INFORMATION

IMI WEBSITE:

http://ec.europa.eu/internal_market/imi-net/

NATIONAL IMI COORDINAT ORS:

http://ec.europa.eu/internal_market/imi-net/contact/index_en.htm

IMI HELPDESK:

imi-helpdesk@ec.europa.eu