

ID	34
What is your name?	Local Government Association
Which best describes you? - Response Category	Local government
Which best describes you? - If other please specify	This response is submitted by the Local Government Association (the LGA), on behalf of local authorities. The LGA is the national voice of local government. We work with councils to support, promote and improve local government. The LGA covers every part
If you are responding as an individual, what best describes your employment status? - Employment status	
How would you classify your organisation/the organisation you work for? - Organisation type	Public sector
How would you classify your organisation/the organisation you work for? - other	
If you are an employee/worker or an employer, how many people work for your organisation? - Size of employer	
If you represent employers or employees/workers, who do you represent? - Representatives	An industry or employer association
If you represent employers or employees/workers, who do you represent? - If other please specify	
Are you happy for your response to be published?	Yes
How did you hear about this consultation?	Email from elsewhere
How did you hear about this consultation? - Other	
Section 1: Improving the transparency of information provided to work seekers	
To what extent would you agree that a 'key facts' page would support work seekers in making decisions about work? - Opinion on key facts	Agree slightly
To what extent would you agree that a 'key facts' page would support work seekers in making decisions about work? - What key facts should be made prominent	In our view the key facts which should be prominent are: - who will be responsible for paying the work seeker , and how they are being engaged - how much the work seeker will be paid by the umbrella company or intermediary; and - any other fees, costs or charges that will be deducted.
To what extent would you agree that a 'key facts' page would support work seekers in making decisions about work? - Reasons for disagreement	

Thinking about work seekers and employers in the recruitment sector, would ensuring work seekers are provided with a key facts page have a: - Please select an option - Individual work seekers	Small positive impact
Thinking about work seekers and employers in the recruitment sector, would ensuring work seekers are provided with a key facts page have a: - Please select an option - Employers in the recruitment sector	Some negative and some positive impact
What information would be important to include in a "key facts" page? - Please type your response in the box below.	The points identified in our response to question 1a is the important information to include.
What conditions should be in place to ensure the 'key facts' page is provided and understood by the work seeker before any contractual engagement?	See below at 3a.
Should an employment business be required to ensure that the work seeker understands fully the information being given to them?	Yes
Should an employment business be required to ensure that the work seeker understands fully the information being given to them? - If yes, how do you think this should be achieved?	Although we have answered yes to the question above, in practice it would be difficult to establish that a work seeker has fully understood the information being given to them. However, the employment business could be required to confirm that it has provided and discussed the key facts document with the worker, and the worker could be asked to sign a statement to that effect. Further, the key facts template could include a link to Government guidance for work seekers.
Do you feel an hour is an accurate estimate of the time it would take to produce information document for a work seeker? - Time taken to produce an information document	Don't know
Do you feel an hour is an accurate estimate of the time it would take to produce information document for a work seeker? - If too high or too low, please provide reasons for your answer:	
Other than the time taken by personnel to produce a "key facts" document, are there other business costs we should be aware of? - Other business costs	Don't know
Other than the time taken by personnel to produce a "key facts" document, are there other business costs we should be aware of? - If you answered yes please provide details	

Section 2: Extending the Remit of the Employment Agency Standards inspectorate to cover umbrella companies and intermediaries in the supply chain

Have you or are you currently using an umbrella/intermediary?	Yes
Have you or are you currently using an umbrella/intermediary? - If so, for what reason?	We have answered this question in the context of local authorities as a whole, some of whom will be in arrangements involving the use of umbrellas/intermediaries. We are unable to comment on their experiences as those will vary.
Do you know of any examples of the benefits and/or problems for agency workers of using an umbrella company or intermediary?	We have not provided examples as individual local authorities will be able to do that.
Should the extension of the remit of the Employment Agency Standards inspectorate to cover the regulation of certain activities of umbrella companies and intermediaries in the supply of work seekers to a hirer - Be limited to the regulation of the key facts page and provision of information relevant to those facts as part of a work offer by the hirer or employer?	No
Should the extension of the remit of the Employment Agency Standards inspectorate to cover the regulation of certain activities of umbrella companies and intermediaries in the supply of work seekers to a hirer - Be aligned to the regulation of the types of employment rights already regulated by EAS under the current legislative framework such as non-payment of wages, deductions from wages which the work seeker has not agreed too, and failure to provide written terms and conditions before the assignment starts?	Yes
Should the extension of the remit of the Employment Agency Standards inspectorate to cover the regulation of certain activities of umbrella companies and intermediaries in the supply of work seekers to a hirer - Please provide reasons for your answer below	Aligning the extension as outlined above will help provide a level playing field.
Thinking about work seekers and employers in the recruitment sector, what impact would ensuring umbrella companies provide work seekers with a key facts page have on: Individual work seekers	Small positive impact
Thinking about work seekers and employers in the recruitment sector, what impact would ensuring umbrella companies provide work seekers with a key facts page have on: Employers in the recruitment sector	Some negative and some positive impact
Thinking about work seekers and employers in the recruitment sector, what impact would ensuring umbrella companies provide	

work seekers with a key facts page have: Please provide reasons for your answers below	
Thinking about work seekers and employers in the recruitment sector, what impact would extending the regulations of the Employment Agency Standards inspectorate to cover umbrella companies have on: Individual work seekers	Small positive impact
Thinking about work seekers and employers in the recruitment sector, what impact would extending the regulations of the Employment Agency Standards inspectorate to cover umbrella companies have on: Employers in the recruitment sector	Some negative and some positive impact
Thinking about work seekers and employers in the recruitment sector, what impact would extending the regulations of the Employment Agency Standards inspectorate to cover umbrella companies have on: Please provide reasons for your answer below	
Section 3: Ensuring the Swedish Derogation is used appropriately	
Have you used or are you currently using a pay between assignments contract (PBA)?	Don't know
In your experience what are the benefits and any problems associated with working on a PBA contract basis?	No local authorities have informed us of any PBA contract arrangements they have, and any associated benefits and problems. However we anticipate they may be used in a small number of cases, and therefore some authorities may respond direct to this question.
In your experience, how effective do you think pay between assignments contracts are in supporting workers and work seekers when they are not working?	Don't know
Do you have evidence that there are wider issues (beyond equal pay) with PBA contracts, for example agency workers not being able to access to facilities, rest break, annual leave or job vacancies?	No.
Do you believe that that the above issues would justify wider state enforcement?	Don't know
Do you believe that that the above issues would justify wider state enforcement? - reasons	
To what extent do you agree that enforcement of the Agency Worker Regulations 2010 should come within the remit of the Employment Agency Standards Inspectorate?	Agree slightly
To what extent do you agree that enforcement of the Agency Worker	It will help create a level playing field across agencies and employers in turn.

Regulations 2010 should come within the remit of the Employment Agency Standards Inspectorate? - Please provide reasons for your answer below	
Any further comments? - Please provide any further comments in the box below.	No.

