

ID	3
What is your name?	
Which best describes you? - Response Category	Individual
Which best describes you? - If other please specify	
If you are responding as an individual, what best describes your employment status? - Employment status	Employed
How would you classify your organisation/the organisation you work for? - Organisation type	Private sector organisation
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	Micro-business (0-9 employees)
If you represent employers or employees/workers, who do you represent? - Representatives	
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?	Twitter
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 strongly
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	
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	Significantly positive impact
Thinking about work seekers and employers in the recruitment sector, would ensuring work seekers are provided with a key facts	Significantly positive impact

page have a: - Please select an option - Employers in the recruitment sector	
What information would be important to include in a "key facts" page? - Please type your response in the box below.	
What conditions should be in place to ensure the 'key facts' page is provided and understood by the work seeker before any contractual engagement?	
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?	<p>An employment business should list the options available and the reasons / consequences). I.E PAYE (You are paid direct by the agency and benefit from your rights and protections under the Agency Workers Regulations) Umbrella company (The umbrella company is responsible for paying you, not us. We are also not responsible for ensuring your protections and rights). Limited Company Contractor (Our contract is with your company, not you. You are not entitled to protections under the Agency Worker Regulations or Employment Rights from us. You are not entitled to National Minimum Wage or holiday pay). Sole Trader / Self Employed (You are not entitled to protections under the Agency Worker Regulations or Employment Rights from us. You are not entitled to National Minimum Wage or holiday pay)</p>
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	Too high
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:	It doesn't take long to put a short document together.
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	No
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?	No
Have you or are you currently using an umbrella/intermediary? - If so, for what reason?	I don't believe in their use by agencies. All employment businesses should engage with workers directly and not via an intermediary.
Do you know of any examples of the benefits and/or problems for agency workers of using an umbrella company or intermediary?	The reason for them is to reduce costs to hirers by reducing tax burden of workers.
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?	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 - 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	I think that anyone engaged via an employment agency should have one option only and that is: PAYE / engaged direct by the agency.
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	No 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	Significantly positive impact
Thinking about work seekers and employers in the recruitment sector, what impact would ensuring umbrella companies provide	Again, I think that all workers should be engaged direct by the agency.

work seekers with a key facts page have: Please provide reasons for your answers below	There is no reason, other than driving down costs and liabilities that intermediaries are used.
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	No 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	Significantly 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	Extending the rules would make the umbrella companies into employment agencies but with special tax status?
Section 3: Ensuring the Swedish Derogation is used appropriately	
Have you used or are you currently using a pay between assignments contract (PBA)?	Yes
In your experience what are the benefits and any problems associated with working on a PBA contract basis?	<ul style="list-style-type: none"> - This model purely exists to get around the AWR and exploit current rules - In reality workers either pay their own PBA, via an accrual from the money paid to the umbrella company from the agency or they don't actually get it.
In your experience, how effective do you think pay between assignments contracts are in supporting workers and work seekers when they are not working?	Not at all effective
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 but most workers on these contracts don't actually understand them!
Do you believe that that the above issues would justify wider state enforcement?	Yes
Do you believe that that the above issues would justify wider state enforcement? - reasons	Would be easier to get rid of all "schemes" and just have PAYE - direct with the agency. Anyone who does have their own limited company, is self employed etc can always claim any overpaid tax back at the end of the year. Whilst they are working via an agency, they should be taxed as a paye employee.
To what extent do you agree that enforcement of the Agency Worker	Agree strongly

<p>Regulations 2010 should come within the remit of the Employment Agency Standards Inspectorate?</p>	
<p>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? - Please provide reasons for your answer below</p>	
<p>Any further comments? - Please provide any further comments in the box below.</p>	<p>Agency workers should not be allowed to choose their tax status and agencies should not be offering a suite of options. Lower paid workers are being exploited by these options and higher paid workers (engineering, IT, technical etc) are, in my view, exploiting the tax system. It's time this stopped. Genuine self-employed and limited company freelancers should be classified as people who find their own projects and contract direct with the hirer - they should not be people who effectively are taking this route as an alternative to filling in for a permanent vacancy or as a contract worker supplied by an agency or third party.</p>

