

ID	26
What is your name?	
Which best describes you? - Response Category	Other
Which best describes you? - If other please specify	Employment Intermediary/Umbrella company
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	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	Large-sized business (250+ 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, but without identifying information
How did you hear about this consultation?	GOV.UK alert
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	Disagree 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	
To what extent would you agree that a 'key facts' page would support work seekers in making decisions about work? - Reasons for disagreement	In our view work seekers would already have made the decision of accept an assignment by the time they would receive that key facts page. We do however think that the key facts page would be useful in providing clarity and transparency to the work seeker.
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	Small positive impact

work seekers are provided with a key facts 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.	All the matters listed in (a) to (f) that you have detailed and in addition details of any payments flowing from the umbrella company/employment intermediary to employment agencies (payments commonly referred to as rebates or "pay per timesheet" payments).
What conditions should be in place to ensure the 'key facts' page is provided and understood by the work seeker before any contractual engagement?	Work seekers should be required to sign or at least acknowledge receipt of the document. The nature of the engagement an the work seekers often mean that all relationships are dealt with electronically so acknowledgement of the key facts page should be a
Should an employment business be required to ensure that the work seeker understands fully the information being given to them?	No
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?	It is not possible to make sure someone understands a document.
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:	The key facts page should be a simple document and contain information that is readily available. It would be part of the generation of other documents between the parties and should be able to be populated electronically.
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?	Not Answered
Have you or are you currently using an umbrella/intermediary? - If so, for what reason?	
Do you know of any examples of the benefits and/or problems for agency workers of using an umbrella company or intermediary?	We are an umbrella company so not applicable.

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	Extension of the EAS remit would drive up standards and compliance within the umbrella sector.
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	Significantly 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	I wanted to put small positive impact fro both responses but the option was blocked out on the second answer once I had answered the first! It would promote transparency and clarity and act as a useful point of reference.
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	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	Work seekers would have a point of redress for any issues that arose. Agencies/end clients would gain comfort from working with a regulated sector which has suffered with a bad press over recent years.
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?	The only benefit is for end clients who are able to pay a lower rate to temporary workers. There is no benefit to the work seeker. It is also a confusing concept for the work seeker to understand.
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 facilities, rest break, annual leave or job vacancies?	No
Do you believe that the above issues would justify wider state enforcement?	Not Answered
Do you believe that the above issues would justify wider state enforcement? - reasons	NA
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 strongly
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	It would provide a "one stop shop" for enforcement within the sector rather than the necessity to go through the tribunal system.
Any further comments? - Please provide any further comments in the box below.	