Contents of checklist

Q no.	Question	Answer
1.	**Intermediary company details:** • If a limited company, registered company no.	10831716
	• Registered name and trading name(s) if different.	People Umbrella Limited
	• Date of incorporation.	22nd June 2017
	• Registered address and trading address if different.	People Group House, Three Horseshoes Walk, Warminster, Wiltshire, BA12 9BT
	• VAT number	271 5896 69
2.	**Group companies:** • Please provide the above details for any holding, subsidiary or associated companies (referred throughout this checklist as ‘group companies’).	People Payments Limited People PSC Limited People CIS Limited People PAYE Limited
3.	**Intermediary officers:** • If a limited company, please confirm the name and address of each company officer (e.g. directors and company secretary. • If a partnership, please list all partners.	Terence Hillier Address as above
	• Please confirm that none of the company officers or partners have ever been disqualified from acting as a company officer, whether while a company officer at this intermediary company, any group company or any other company. ▪ If a company officer or partner has ever been disqualified please give details as to when that disqualification commenced and ceased, why the individual was disqualified and by whom.	Confirmed
	• Please confirm that none of the company officers have been involved in a ‘phoenix company’ i.e. they have not liquidated, dissolved or otherwise ceased the operation of a company only to resurrect the services provided by and operations of that company in another company. If yes, please explain the circumstances around liquidation, dissolution or cessation of operation of any previous companies.	Group restructuring involving transfer of business in 2017. If you need further information, please contact legal@peoplegroupservices.com

4.	**Financial matters:**	
	Please note that we (the employment business) will only pay into a UK business bank account held in the umbrella company's name.	
	• Please confirm how the intermediary company protects monies relating to temporary workers' pay, e.g. are they held in separate client accounts?	Confirmed
	• Please confirm that neither you nor any group company pays temporary workers via an offshore entity.	Confirmed
	• Please confirm that all temporary workers are paid in full via their own UK bank, building society or post office accounts (and not those of any nominee or third party).	Confirmed
5.	**Insurance:** • Please provide details of insurances held including in particular (a) employers' liability, (b) professional indemnity, and (c) any AWR related insurance.	Please see attached copy insurance policies.
6.	**Accreditation body membership:** • Is the intermediary company a member of a recognised membership accreditation body?	Accredited by Professional Passport & APSCo Trusted Partner
	• Please provide us with evidence of membership.	Please see attached
7.	**Gangmasters and Labour Abuse Authority (GLAA) licensing:** • If the intermediary company operates in the GLAA registered sector, please provide its GLAA licence number.	Not applicable
	• Has the GLAA ever refused or revoked the intermediary company's licence or that of any group company? If yes, please explain why.	Not applicable
	• Has the GLAA ever imposed Additional Licensing Conditions on the GLAA licence or that of any group company? If yes, please give details including the nature of the Additional Licensing Conditions, dates and the outcome.	Not applicable

<table>
<tr><td></td><td>Has the intermediary company ever been subject to a GLAA complaint or investigation? If yes, please give details including the nature of the complaint/investigation, dates and the outcome. Please provide documentary evidence as to the conclusion of the GLAA complaint/investigation.</td><td>Not applicable</td></tr>
<tr><td>8.</td><td>Contractual documentation:
Please provide a copy of your standard terms of business with employment businesses.</td><td>Copy of Master Agreement – People Umbrella Ltd attached</td></tr>
<tr><td></td><td>Please confirm that all temporary workers for whose services the intermediary company charges are engaged directly by the intermediary company and not by any other legal entity whether a group company or otherwise.</td><td>Confirmed</td></tr>
<tr><td></td><td>Please tick the contracts the intermediary company engages temporary workers on:
Annualised hours contracts
Zero hours contracts
Self-employed contracts
Personal services/mini-umbrella
Elective deduction model (or similar arrangements)
Joint employment model
Other? Please describe
Please provide a copy of each contract.</td><td>Zero hours contracts</td></tr>
<tr><td colspan="3">Specific compliance requirements</td></tr>
<tr><td>9</td><td>ID checks:
Please confirm the process(es) the intermediary company uses to check the identity of the temporary worker.</td><td>Should a contractor fail an online ID check then People Group Services would require photographic ID and proof of address (utility bill) and any Visa requirements before any employment commences with every candidate.</td></tr>
<tr><td>10</td><td>Right to work checks:
Please confirm the process(es) the intermediary company uses to check that the temporary worker has the right to work in the UK.</td><td>As above</td></tr>
</table>

	• Has the intermediary company ever been found by the UK Border Agency/the Home Office (or any of their predecessors) to have supplied illegal workers? If yes, give details.	No
	• Has the intermediary company been fined by the UK Border Agency/the Home Office? If yes, please provide the level and date of fine and an explanation as to why the fine was issued.	No
	• Please confirm the checks the intermediary company carries out to ensure that temporary workers/contractors have not been subjected to slavery, human trafficking or exploitation as defined in the Modern Slavery Act 2015.	Please see attached Anti-Slavery and Human Trafficking Policy
11.	**Conduct of Employment Agencies and Employment Businesses Regulations 2003 (the Conduct Regulations):** XXXXXXX is required to comply with the Conduct Regulations unless those regulations do not apply because the work-seeker has opted out. • If a temporary worker wishes to opt out of the Conduct Regulations, please explain how the intermediary company manages the opt out process.	Contractors agree to opt out of the EAA Regs as far as may be practical when agreeing the terms of their employment agreement. Occupational restrictions would prevent them from opting out and therefore would not be practical, for example contractors working with the young and vulnerable.
	• How does the intermediary company (a) ensure that the opt out is validly given i.e. signed by both the intermediary company and the individual work-seeker and (b) notify us if the intermediary company and the temporary worker have opted out of the Conduct Regulations?	See above, no notification required
	• Does the intermediary company automatically opt all contractors/workers out of the Conduct Regulations? What % of contractors/workers opt out of the Conduct Regulations?	As above, only those contractors whose role involves working with vulnerable adults or children would not be opted out.

	The Key Information Document Since 6 April 2020 employment business must give all work-seekers a **key information document** (KID) which must include information about all charges and deductions made to a work-seeker's pay. Where they work through an intermediary company, the KID must include the fee the intermediary company charges for processing their pay. • Please list all charges and deductions which the intermediary company may make to a work-seeker's pay. • Please clearly show how the intermediary company calculates any charges it makes to temporary workers for its services including the payroll charge/admin fee/service charge? Please provide all documentation relating to any additional services the intermediary company may provide to temporary workers. • How and when does the intermediary company advise the temporary workers of any charges made for its services? • What processes are in place to ensure that the intermediary company will advise the employment business immediately if any details on the KID change or require updating?	Please see example KID attached. There are no charges made to the worker for our services. Our margain is detailed on the KID. The worker is automatically provided with a KID based upon actual figures for that assignment on registration when figures are provided. The worker is also provided with an updated KID each week based upon payments recieved
12.	**Agency Workers Regulations 2010 (AWR):** • How does the intermediary company work with employment businesses and their clients to manage AWR claims?	Where a claim is received the employment business will be notified and involved in all correspondence
	• How many AWR related employment tribunal claims has the intermediary company been notified of from its workers and how many have progressed to a hearing? Please provide us with a copy (or a link) to any employment tribunal decisions.	Not applicable
	• If any AWR claims have proceeded to hearing what were the tribunal's, EAT's or higher court 's decisions?	Not applicable
	• Please confirm that the intermediary company agrees to accept full liability, and to indemnify XXXXXXXX Limited for any losses (as defined in terms of business) incurred in relation to the	We will indemnify for claims arising as a result of our sole responsibility / default

	intermediary company's arrangements with the temporary workers.	
	• Please confirm that the intermediary company has appropriate insurance cover (in terms of content and level of cover) in place to cover any AWR claims. ▪ Please confirm that the employment business can benefit from such insurance and on what basis e.g. that the employment business is a named insured party for the purposes of that insurance.	We hold professional indemnity cover for our actions, this cover does not extend to benefit any third party
13.	**Working Time Regulations 1998 (WTR):** • How does the intermediary company calculate: ▪ holiday pay? ▪ holiday leave?	Entitlement to paid annual leave is calculated in accordance with the WTR
	• Please confirm that the intermediary company pays holiday pay at the time the temporary worker takes their holiday and does not roll it up into the hourly rate. ▪ If the intermediary company rolls up holiday pay, please explain (a) why this happens and (b) how this is made clear to the temporary worker both in advance and each time it is rolled up.	Holiday is accrued by default. Employee's are encouraged to take holiday when not otherwise working. If an employee request in writing that holiday should be paid out weekly it is separately shown on the payslip and not rolled up.
	• Please confirm that the intermediary company pays all accrued holiday pay to temporary workers. ▪ If the intermediary company does not pay all accrued holiday to temporary workers, please explain why.	All holiday pay is paid as requested by the contractor. In sectors with define holiday we also auto pay holiday entitlement.
14.	**National minimum wage/National living wage:** • Does the intermediary company pay at least the applicable rate of NMW/NLW to all temporary workers for all hours worked? If not, why not? See also section 25 (HMRC)	Yes
15.	**The Intermediaries Legislation ('IR35'):** • Since April 2017 the off-payroll rules were applied in the public sector and in April 2021 they applied in the private sector for medium and large sized clients	

	• Some technical changes to the off-payroll rules were made in 2021 which included a wider definition of an intermediary so that intermediary company workers are not within the scope of the rules because they will not have an interest in the company and only receive employment income. Please confirm that:	
	• the workers do not have any shareholding in the intermediary company; and	Confirmed
	• they only receive employment income	Confirmed
	• the intermediary company does not set up, promote, facilitate or otherwise engage with the formation of another intermediary company through which the temporary worker/contractor may be engaged. • If this does happen, please explain why and how the intermediary company promotes, facilitates or otherwise engages with the formation of another intermediary company to engage the temporary worker.	Confirmed
	• Please confirm that the intermediary company (or any other intermediary company it has engaged with) does not operate any disguised remuneration schemes.	Confirmed
	• Please confirm that the intermediary company (or any other intermediary company it has engaged with) does not operate any disguised remuneration schemes, including but not limited to any loan and pension annuity schemes or any schemes identified by HMRC as non-compliant (See HMRC's Spotlights).	Confirmed
	General:	
	• What industry sectors do they operate in? e.g. IT, teaching, health, finance, legal, hospitality, retail, engineering, construction, oil and gas, etc.	Not applicable, all workers are within IR35
	• Please provide a copy of all marketing materials and all terms of business which the intermediary company may use with the employment business and any temporary workers or contractors it may engage with.	Attached
16.	**Deduction of PAYE and National Insurance contributions:**	

	• Does the intermediary company treat all income earned by the temporary worker as taxable earnings subject to PAYE tax and NICs in accordance with UK tax law and HMRC guidance? If not, why not?	Yes, all correct Tax and NI deductions are made before release as PAYE income to the contractor.
	• Please confirm that the intermediary company does not use any disguised remuneration schemes including but not limited to loan schemes.	Confirmed
	• Please provide pay slips and RTI receipts showing that (a) full PAYE and NICs have been deducted from the temporary worker's pay and (b) employers' NICs have been paid. See also section 23 (HMRC).	Attached
17	**Travel and subsistence expenses:** • Does the intermediary company operate any expenses schemes under which it will pay a temporary worker/contractor some or all their travel and/or subsistence expenses?	Agency reimbursed expenses only, in accordance with Professional Passport audit requirements
	For the purposes of this section "under SDC" means working under (or subject to the right of) supervision, direction or control of any person as to the way in which the temporary worker provides the services. • Please confirm that the intermediary company does not operate a travel and subsistence (T&S) expenses relief scheme for temporary workers working under SDC.	Confirmed
	• How does the intermediary company establish whether the temporary worker does or does not work under SDC? Please provide full details of the umbrella company's process.	This is a PAYE product which requires the contractor to accept that they are under SDC
	• Does the intermediary company operate a T&S scheme for temporary workers not working under SDC? If yes, on what basis? Please provide a copy of the scheme documentation and processes as to how T&S is facilitated given the removal of salary sacrifice and variable pay in exchange for expenses. This includes any material provided to the temporary worker.	No, expenses must be submitted through form P87
	• Does the intermediary company have a minimum hourly pay rate below which the intermediary company will not operate the T&S scheme? If yes, what is that rate? Why has the business chosen this rate?	Not applicable

	• Please confirm that neither the intermediary company, nor any group company, operates a pay day by pay day relief model.	Confirmed
	• Please confirm that: ▪ all travel and subsistence expenses for which the temporary worker receives tax and NICs relief are genuinely incurred by the temporary worker claiming the expenses; and ▪ that the intermediary company regularly conducts spot checks to check that those expenses have been genuinely incurred.	Not applicable as expenses are not processed in house. These are directed to HMRC for approval at year end via P87 or Self-Assessment.
	• Has HMRC reviewed the intermediary company's application of travel and subsistence expenses at any time? ▪ If yes, what was the outcome? Please provide documentary evidence from HMRC.	Not applicable
18.	**Pensions:** • When did/will the intermediary company stage for auto-enrolment purposes?	01/02/2018
	• Does the intermediary company postpone enrolment for eligible jobseekers?	No, contractors are automatically enrolled
	• Please confirm the percentage of temporary workers engaged by the intermediary company who have opted out of pensions auto-enrolment.	20%
	• Please confirm that the intermediary company has not directly or indirectly induced any temporary worker to opt out of their rights under the Pensions Act 2008, for example, by telling individuals that assignments are only available for those who have opted out.	Confirmed
	• What pensions provider does the intermediary company use?	NEST
	• What software does the intermediary company use for pensions auto-enrolment purposes? ▪ Does the software track how an individual moves from one category of worker to another? If it doesn't do this already, what plans do you have to upgrade (and why is there a delay in producing the required software?) ▪ Does the software prompt users regarding their record keeping requirements?	Our system includes information needed for each contractor for auto enrolment purposes. It decides which person is eligible each week to make contributions and relays relevant information to NEST who produce all relevant paperwork for the contractor

	▪ Does the software produce the relevant notices for the agency and/or the workers?	
19.	**Internal complaints process:** • Please explain the intermediary company's complaints handling process for workers and agencies and advise whether this is publicly available (e.g., published on website). Please provide a copy of the complaints procedure.	Attached Complaints procedure
	• Please advise on the number of complaints received in each of the past three years.	Confidential business information, please contact legal@peoplegroupservices.com
	• Please advise on the type of complaints received in each of the past three years.	Confidential business information, please contact legal@peoplegroupservices.com
	• Please advise on how complaints were resolved.	Confidential business information, please contact legal@peoplegroupservices.com
	• Are there more complaints from one sector than others?	Confidential business information, please contact legal@peoplegroupservices.com
	• How does the intermediary company deal with payment issues e.g. queries re timesheets, rates of pay? Do you deal directly with the employment business or directly with the temporary worker?	Our dedicated Client Care Team deal with all contractor queries. They work closely with the Payroll team and will only refer back to the agency in circumstances where further clarification is needed.
20.	**External complaints (e.g. to BEIS/EASI, GLAA, The Pensions Regulator (TPR), ACAS):** • Has the intermediary company ever been the subject of a complaint to BEIS/EASI, the GLAA, TPR, ACAS or other?	No
	• Number of complaints received in each of past three years.	Not applicable
	• Type of complaints received in each of the past three years.	Not applicable
	• How complaints were resolved.	Not applicable
21.	**ACAS/employment tribunal claims:**	Tribunal judgments and claims are publicly available on the GOVT website

	• Please tell us about any matters referred to ACAS or any employment tribunal claims the intermediary company has received in the past three years. In particular:	Confidential business information, please contact legal@peoplegroupservices.com
	• Type of claim (e.g. employment status, dismissal, non-payment of wages, discrimination etc.).	Confidential business information, please contact legal@peoplegroupservices.com
	• Number of claims.	Confidential business information, please contact legal@peoplegroupservices.com
	• Number of claims settled.	Confidential business information, please contact legal@peoplegroupservices.com
	• Number of claims which intermediary defended.	Confidential business information, please contact legal@peoplegroupservices.com
	• Number of claims lost.	Confidential business information, please contact legal@peoplegroupservices.com
22.	**HMRC complaints or investigations:** • Please tell us about any complaints or investigations HMRC has raised with the intermediary company, or any group company, or any other of which a director of your company was also a director at any time within the past six years. In particular, please advise on complaints or investigations relating to the following:	Not applicable
	• NMW.	Not applicable
	• Holiday pay.	Not applicable
	• Deduction of PAYE tax and NICs, payment of employer NICs.	Not applicable
	• Travel and subsistence.	Not applicable
	• Real Time Information reporting.	Not applicable
	• VAT (in the past four years).	Not applicable
	• Other.	Not applicable
23.	**Services provided to temporary workers:**	

	• How many temporary workers/contractors are on the intermediary company's books?	Circa 6,000
	• Are there seasonal or annual variations?	Academic year variations
	• Benefits packages for contractors/workers: ▪ Please provide details of any benefits packages you offer to contractors/workers: ○ Type of service ○ Cost of service ○ Eligibility criteria ○ Assessment of suitability of the product/service. ▪ Please confirm that these are optional services the contractors/workers may choose to take. ▪ If these are not optional services, but the contractors/workers are required to take these services, please confirm why these are compulsory rather than optional services. ▪ What is the connection between the company providing the optional services and the umbrella company?	Contractors have access to a points-based rewards package called My Wallet. They can choose to use the services if they wish but none are mandatory. To obtain the required reduction in premium achieved by large numbers and to avoid positive selection these benefits are available to all new contractors. There is no connection.
24.	**Referral fees:** • Please confirm that the intermediary company <u>**does not pay a fee**</u> to any employment business or end user clients in order to be included on a preferred supplier list or for any other reason. This includes referral fees whether to the employment business or direct to its staff, timesheet rebates or other. • If a referral fee is paid, please confirm the basis for paying the fee.	Business to Business only
	• Please confirm that (a) the intermediary company does not refer temporary workers to any group company or any accountancy service provider(s) and (b) that it does not receive a fee for such referral. • If the intermediary company does make such referrals and/or receive such fees, please confirm the basis upon which you make such referrals and receive such fee(s).	Confirmed
25.	**Data protection/UK GDPR**	

	• Please provide a copy of the intermediary company's data protection policy and any privacy statements it provides to individuals.	Attached
	• Please confirm that the intermediary company does not transfer personal data outside of the European Economic Area. If the intermediary company does make such transfers, (a) on what legal basis does it make these transfers and (b) to whom does it make the transfers?	Confirmed
	• Please confirm the intermediary company's process for dealing with any data subject's rights including: ▪ Subject access requests ▪ The right to rectification ▪ The right to request erasure of personal data ▪ The right to object ▪ The right to be informed ▪ The right to withdraw consent ▪ The right to data portability ▪ Rights relating to automated decision-making and profiling	Policy attached
	• Has the intermediary company ever had a data protection breach? If yes, how did the umbrella company resolve this?	No
	• Has the intermediary company ever been under investigation by the Information Commissioner's Office for any alleged breaches of data protection laws? If yes, what was the outcome of such investigation?	No

I confirm that:

the information provided via this checklist by People Umbrella Limited is complete and accurate.

People Umbrella Limited will keep XXXXXXXX Limited updated if any of the information provided changes; and

People Umbrella Limited agrees to provide XXXXXXXX Limited with any and all additional information which XXXXXXXX Limited may require to enable it to comply with its reporting requirements under the Income Tax (Pay as you Earn) (Amendment No. 2) Regulations 2015.

Signed: ....

Print name: Terry Hillier..

On behalf of: People Umbrella Ltd...............................

Position at the company : CEO..

Date: 21/11/2023...