



## Corporate and Social Responsibility Policy.

**Date:** 4<sup>th</sup> July 2023

**Review Date:** 4<sup>th</sup> July 2024

Prospero’s Corporate and Social Responsibility policy draws its content from a number of client, candidate and employee facing documents. This policy contains a summary of each of the embedded documents, and then links to the most recent version of the original documentation.

### Equality and Accessibility

Prospero Group Ltd embraces diversity and aims to promote the benefits of diversity in all of our business activities. We seek to develop a business culture that reflects that belief. We will expand the media in which we recruit to in order to ensure that we have a diverse employee and candidate base. We will also strive to ensure that our clients meet their own diversity targets.





Prospero Equality  
and Diversity Policy.pdf

### Anti-human Trafficking , Modern Slavery, Child Labour and Inhumane Treatment

Prospero Group Ltd are a relevant commercial organization as defined by section 54 (Transparency in supply chains etc”) of the Modern Slavery Act 2015. As a recruitment and training SME, our supply chain is minimal, and primarily UK based. We don’t sub-contract any recruitment services, and don’t directly engage other agencies.

Where we require an external company to produce goods or services, we ensure these external companies have a Modern Slavery Act, we are APSCo registered, which ensures we follow industry best practice.

 Modern Slavery, Child Labour and Inhu	 Anti- Slavery and Human Trafficking Poli
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### Income Security and Working Hours

Prospero primarily operate an umbrella company payment model. This enables our candidates to choose from a audited PSL of umbrella companies with benefits, perks and prices to suit their requirements. We are also introducing a PAYE model, which will enable complete payment method flexibility for all candidates. This guarentees income security and flexibility – including whether candidates wish to be paid monthly, weekly, inclusive or exclusive of holiday deductions, and other payment choices.

As part of our registration process, Prospero ensure all candidates sign a Working-time directive declaration. This forms part of their record on our single central CRM.

## **Protection of Temporary Workers (including transparency of 'take home pay')**

To ensure that all of our clients are paying the correct contribution under the working time directive, our CRM system has an automated alert that prevents a consultant from booking a candidate or client in for a role, where their working hours exceed the limit.

If WTD needs to be exceeded, then our CRM generates an audit trail which confirms with the client, candidate and other stakeholders, retrieving signature confirmation from each stakeholder.

Prospero operate a primarily umbrella company payroll solution, and act as an employment finding service on behalf of our candidates. To ensure that the user is paying the correct WTD, we only work with approved umbrella companies based in the UK. To further promote Transparency of Pay, all candidates are given an example Key Information Document, which is intended to improve transparency of agency workers, particularly around pay. This enables each candidate to see what their pay rate, tax rate, any deductions are, and what their "Take Home" pay would be, once they have input their agreed pay rate into our KID Calculator.

Prospero also ensures that all umbrella companies on our PSL must provide a KID summary to each candidate. The Key Information Document also ensures that all candidate's pay meet national minimum wage requirements

## **Sustainability**

### **Promote Employment & Economic Sustainability**

As a recruitment agency our focus is on the improvements and opportunity to train staff on our books, Prospero will adopt a local recruitment strategy, with a focus on hiring local staff to support and educate local young people. This contributes to social value, as our dedicated staff work closely with young and vulnerable adults to improve their physical health, mental health and academic attainment and, ultimately, increase their life prospects. Examples include creating apprenticeships, work with schools, and working with recent graduates to attain their career goals and meet their potential.

### **Raise the living standard of local residents**

Prospero will meet with local nominated contract officers on contract award with the aim of brokering a meeting with local collective caring networks. We recognise social economic issues are normally compounded by other social economic issues and sometimes the children and vulnerable adults have additional social and economic barriers to address even before engaging in education.

### **Promote Participation and Citizen Engagement**

We will identify any alternative working opportunities we could generate through our work locally to tie into any parent whose caring responsibilities get in the way of their child's health and education. In addition, we will develop best practice through the local collective caring networks, to understand and support how we can better support and enable local caring individuals to find meaning vocational activity around caring activity.

### **Promote Environmental Sustainability**

Environmental Management: Prospero will work with local environmental agencies to reduce our direct impacts by working with our employees, clients and suppliers. Prospero will make a contribution to communities through volunteering, including the use of our professional skills to support local charities and community groups.

### **Build capacity and sustainability of the Voluntary and Community Sector**

Prospero will open a number of provide additional training and development opportunities to the local workforce. Prospero will offer public facing, fully accredited, free Level 1 Safeguarding course in the education recruitment sector, demonstrating our dedication to creating a safe and educated safeguarding environment for all staff and educators in the UK.

### **Promote Equity and Fairness**

Prospero Group's commitment to Safer Recruitment, across all the sectors we work in, demonstrates our commitment to equity and fairness. All workers on this contract, both in our local supply chain and our local candidates, will be paid more that the living wage.

## **IR35 and ITEPA Legislation**

Prospero Group IR35 – monitoring, measuring, and reporting

Prospero Group shall ensure that income tax and national insurance are paid through UK PAYE, or any taxation method imposed in succession thereto in line with IR35 Legislation.

We work with several umbrella and Ltd company solution providers. They have all been audited by Prospero Group and independent assessors Professional Passport. We insist upon them completing an HMRC audit questionnaire to be allowed onto our Preferred Supplier List.

The questionnaire asks the umbrella companies about their procedures in terms of monitoring, measuring and reporting on IR35 and AWR. Where umbrella is chosen, workers are fully employed by the Umbrella Company and paid only employment remuneration, meaning PAYE and NICs are deducted on the full extent of their taxable gross. Therefore, no IR35 assessment is required for these workers, as confirmed by HMRCs technical note published on 1st March 2017 (Section 50), which reads “Umbrella Company; Where an umbrella company employs the worker directly and not through an intermediary, the new off-payroll rules do not apply...”

Where a worker chooses to operate via their own limited company, or ‘PSC’, then the umbrella company will offer an IR35 assessment where they review both the contract, and the working practices in order to provide a professional opinion as to IR35 status. Prospero Group understand that this is really only relevant to the private sector now, as the end client will often dictate IR35 status in the public sector, leading to the use of umbrella in most cases.

We report to HMRC on a quarterly basis with a list of workers, their status, pay and tax paid. This is then monitored by HMRC and any shortfall is communicated to us to action.

Internally, our dedicated accounts department, based from our London head office, monitor IR35 compliance across all sectors of the business. We maintain close relationships with umbrella companies on our PSL, holding termly review meetings to ensure continued compliance and improvement.

We actively monitor, measure and report on any issues raised by HMRC, umbrella companies, clients and candidates.

## **Supply chain & prompt payment of suppliers**

Prospero operate a prompt payment methodology. This is evidenced in our 2020 Company Credit Check, embedded, which shows a 1.87 Creditors average payment time. Prospero work closely with our suppliers to ensure consistent communication, clarity on all invoicing and crediting matters, and mutually beneficial relationships.



Credit check for  
Prospero Group Limit