NASA Umbrella Ltd
Modern Slavery & Human Trafficking Statement

1. Introduction

This statement sets out the position of NASA Umbrella Ltd, a company registered in United Kingdom under number 06836385 whose registered office is at 5th Floor, Castlemead, Lower Castle Street, Bristol, BS1 3AG ("the Company") regarding its obligations under the Modern Slavery Act 2015.

The Modern Slavery Act 2015 aims to give UK law enforcement tools to fight modern slavery and support for victims. Businesses over a certain size are required each year to report on the steps they have taken to ensure there is no modern slavery or human trafficking in their business or their supply chain.

2. Document history

Notes	Date	By who	Version
Document created	06/05/2016	AS	2016.1
Document reviewed & signed	10/05/2017	AS	2017.1
Document reviewed & signed	08/05/2018	AS	2018.1
Document reviewed & signed	14/05/2019	AS	2019.1
Document reviewed & signed	19/06/2020	AS	2020.1
Document updated & signed	27/04/2021	AS	2021.1
Document amended & signed	07/09/2021	AS	2021.2
Document reviewed & signed	21/04/2022	AS	2022.1

3. Period covered

This statement relates to the financial year 1st April 2021 – 31st March 2022.

4. Responsibilities

Persons within the organisation with responsibility for managing NASA's Modern Slavery policies & process:

- Alex Spendley (Sales Director)
- Pippa Elsey (HR Director)
- Amy Kightley (Associate Director)

Their duties include:

- Policies on modern slavery
- Due diligence processes
- Risk assessment
- Measuring effectiveness
- Training for staff

5. Structure & Supply Chains

As part of the umbrella payroll industry in the UK, NASA Umbrella Ltd recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its

corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

NASA Umbrella Ltd is commonly controlled with NASA Consulting Ltd trading as NASA Group, with all our internal employees based in the United Kingdom.

NASA Group provides services to recruitment agencies and their clients where we employ contractors, freelancers, and temporary agency workers and provide accountancy services for those operating under their own Limited Company or PSC.

NASA's contractor employees work in several industry sectors, including:

IT & Technology	Telecoms
Engineering & Technical	Banking & Finance
Construction	Healthcare
Education	Manufacturing

The supply chain in an umbrella company employment model is generally as follows:

- An end user engages a recruitment agency to source contract resource to support their resource requirements. The end user and recruitment agency will generally enter into a supply of services agreement.
- The recruitment agency sources suitable candidates for the end user, who decides which contractor/s to engage with.
- Where an individual utilises an umbrella company already, they will inform the agency who will engage with the umbrella company on a contract for services. The worker may not have an umbrella company in place, in which case the agency may refer the worker to their preferred providers (such as NASA) or the worker may have sourced their own compliant provider.
- The umbrella company will employ the worker issuing a contract of employment and confirm their identity and right to work in the UK. The umbrella company invoices for the work the contractor completes at the end user with funds travelling down from the end client to the agency who pay the umbrella company.
- The umbrella company retains its employment costs from this income before calculating & deducting the workers tax and national insurance contributions and paying the net pay to the worker (and remitting tax to HMRC).
- This is the end of the supply chain.

6. Process & Procedure

Key procedures used by NASA to assess the risk of, and to prevent modern slavery and human trafficking in the supply chain are as follows:

- All workers are fully employed by NASA Umbrella Ltd and we ensure that they receive full employment benefits and earn at least the Living Wage as they work
- NASA undertake stringent checks on a prospective employee's Identity, Right to Work in the UK and Anti-Money Laundering which includes document verification and online checks against credit status, gone away and PEP data. This reduces the risk of modern slavery or trafficking.

- All employees receive full employment benefits including but not limited to holiday, sick, maternity, and paternity pay.
- NASA identify the overall risk of slavery and human trafficking by mapping our supply chain and analysing countries that workers may be sourced from. All workers are engaged in the UK through UK based recruitment agencies and end users.
- NASA conduct annual audits of our operations and processes through our FCSA accreditation ensuring they are robust and exceed minimum standards for compliance and ethics.
- Extensive training is provided to relevant back-office support teams to ensure understanding and enforcement of processes.
- Currently NASA have 10+ employees with full training on this topic, actively running ID and right to work checking of all employees under the employment of NASA Umbrella Limited.
- Payroll software set to automatically flag any funds received below the minimum wage, with reporting system in place to raise any issues as soon as possible to the relevant agency / client in the assignment chain.
- Grievance and Whistleblowing procedure open and free for all employees to use in confidence.
- Strict payment of all funds to personal, named bank accounts of the employee in the UK.

7. Implementation of Statement

This statement shall be deemed effective as of 1st April 2022.

This statement has been approved and authorised on behalf of the Board by:

Name: Alex Spendley

Position: Director

Date: 21 April 2022

