

# **CONSULTATION PAPER**

## **MINIMUM WAGE**

### **September 2006 REVIEW**



Issued by the Employment Forum on 29 September 2006

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#### **DEADLINE FOR RESPONSES 10 November 2006**

#### **PURPOSE OF CONSULTATION**

Jersey's Minimum Wage was introduced on 1<sup>st</sup> July 2005 as a result of the Employment (Jersey) Law 2003 coming into force. The first review of the Minimum Wage was undertaken by the Employment Forum in October 2005 which resulted in new rates applying from 1<sup>st</sup> April 2006.

This consultation is the second review of the minimum wage to be undertaken by the Employment Forum. The purpose is to seek views about the minimum wage system; to consider whether the rate should be increased, and if so, by how much, when and how it should be updated by in future, as well as considering other issues about trainees, therapeutic workers and the offsets for accommodation and food.

#### **SUMMARY**

Section 1 – Background

Section 2 – Minimum wage rates in other jurisdictions

Section 2 – Summary of consultation previously undertaken

Section 4 – Details of specific issues to be consulted upon

Section 5 - Questionnaire on the Minimum Wage

**Please respond by 10 November 2006**, either by email, post or fax to;

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To ensure that your comments are clear, the Forum would prefer to receive typed responses. If you wish to receive an electronic copy of this paper, please contact the Secretary, or download it from the States website -

[www.gov.je/ChiefMinister/PublicConsultations](http://www.gov.je/ChiefMinister/PublicConsultations)

***The Employment Forum is grateful for your comments***

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#### **SECTION 1 - Background**

The original report to the States on 'Minimum Wage Legislation' (P.227/1998) was debated by the States and approved in March 1999. It was based on research carried out in 1997, and provided for the introduction of a minimum wage and trainee wage, and the establishing of an independent body (the Employment Forum) which would act as a consultative body, to monitor the economic impact of the minimum wage and to make recommendations to the former Employment and Social Security Committee (ESSC).

The Employment Forum's first Minimum Wage Recommendation was issued in October 2003. The outcomes of that consultation are discussed in Section 3.

Based on the Forum's recommendations, a Minimum Wage Report was presented to the States by the ESSC on 6th January 2004, which provided information regarding the likely rate of minimum wage.

On 20th July, 2004, the States of Jersey approved the subordinate legislation required to bring the minimum wage into force under the Employment Law. The Employment (Minimum Wage) (Jersey) Regulations 2004 and the Employment (Minimum Wage) (Jersey) Order 2004 came into force on the same date as the Employment Law (1<sup>st</sup> July 2005) which provided the legislative framework for the minimum wage and formalised the Employment Forum.

During October 2005, the ESSC directed the Forum to review the impact of the minimum wage since it had come into force and to consider if any increase should be applied in 2006. The outcomes of that consultation are outlined in Section 3.

The Forum's first "Minimum Wage Review" recommended a 3% increase in all minimum wage rates. This was approved by the ESSC and the Regulations were approved by the States on 14th February 2006, following which the newly appointed Social Security Minister made an Order setting the new minimum wage rates, to apply from 1st April 2006.

Two specific issues of importance were raised during the consultation as calling for more detailed consideration, regarding the trainee rate and therapeutic work. The Forum agreed to give these two aspects further consideration in the next review. These two issues are discussed further in Section 4.

#### **SECTION 2 – OTHER JURISDICTIONS**

##### **UK**

The UK introduced a National Minimum Wage in April 1999 at an initial rate of £3.60. The Low Pay Commission was aware that low-paid workers would not be

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helped if it recommended a rate so high that jobs would be put at risk. So, the Commission recommended that the Minimum Wage should be introduced at a prudent rate offering real benefits to the low paid, while avoiding unnecessary risks to the economy, businesses and jobs.

Since assessing its economic impact, the UK has increased the minimum wage in significant jumps ahead of inflation. However, in a recent press release (20 March 2006), the Low Pay Commission concluded that *“the phase in which the Commission was committed to increases in the minimum wage above average earnings was now complete and, looking forward, the commission will start with no presumption that further increases above average earnings are required.”*

The national minimum wage is aimed at providing employees with decent minimum standards and fairness in the workplace. It applies to nearly all workers and sets hourly rates below which pay must not be allowed to fall. It is intended to help business by ensuring companies will be able to compete on the basis of quality of the goods and services they provide and not on low prices based predominantly on low rates of pay.

*[Note – The Employment Forum’s 2004 Minimum Wage recommendation pointed out that, in Jersey, the hospitality and agriculture industries could be disproportionately affected as they are predominantly export oriented and are subject to international competition, rather than catering to on-Island demand.]*

The current hourly rates, and the rates to be implemented on 1<sup>st</sup> October 2006 (following the latest recommendation from the Low Pay Commission), are;

- Adult workers (22 and over) - £5.05 an hour (increasing to £5.35)
- Development rate (18-21 year olds) - £4.25 ( increasing to £4.45)
- Development rate (16-17 year olds) - £3.00 (increasing to £3.30)
- Young workers rate (16 and 17 year olds) - £3.00 per (increasing to £3.30)
- Apprentices (16 and 17 years old) - exempt from the young workers rate
- Accommodation offset – £27.30 per week (increasing to £29.05 per week)

#### **Isle of Man**

From 1<sup>st</sup> October 2006 the new rates that have been recommended by the Minimum Wage Committee, an independent body comprising employer and employee representatives, are:

- Adult workers (18 and over) - £5.40 per hour (up from £5.25, a 2.9% increase)
- 17 year olds and certain trainees - £5.05 per hour (up from £4.90, a 3.1% increase)
- 16 year olds - £4.50 per hour (up from £4.20, an increase of 7.1%).

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This is against a background of the latest Treasury figures showing an overall annual increase of 0.9% in average pay in the Isle of Man and also inflation for the year to end of May at 3.3%.

Since its introduction in January 2002, the adult minimum wage has increased by 32% compared with inflation of 18%, evidence that it has been successful in raising real earnings for the Isle of Man's lowest paid workers.

The latest earnings data analysed by the Isle of Man Treasury shows that around 3% of the Island's workforce of 35,000 earn below £5.40 per hour. It is therefore estimated that about 840 workers stand to benefit from the October increases.

#### **Guernsey**

Guernsey does not currently have minimum wage legislation.

### **SECTION 3 - PREVIOUS CONSULTATION**

Full details of the Forums two previous recommendations on the Minimum Wage are available on the website or can be obtained from the Forum Secretary.

[www.gov.je/SocialSecurity/Employment/Employment+Services/Employment+Relations/The+Employment+Forum.htm](http://www.gov.je/SocialSecurity/Employment/Employment+Services/Employment+Relations/The+Employment+Forum.htm)

#### **The Forum's First Minimum Wage Recommendation**

##### *Background*

The principles behind the minimum wage were to support a competitive economy; be set at a prudent level; be simple and straightforward; and yet make a difference to the low paid. The aim was to provide a package that takes account of business realities but removes the worst cases of exploitation and to provide a minimum standard for wage levels, in the same way that other components of the Employment Law provide minimum standards in the employment relationship, including rest days, annual leave and notice entitlement.

Taking guidance from the views of the Low Pay Commission in the early days of developing the UK minimum wage, the Forum was aware that setting a higher minimum wage rate could make a more substantial difference to the low paid and a greater number of workers, but also that low-paid workers wouldn't be helped if the rate recommended was so high that jobs would be put at risk.

Due to the uneven distribution of pay in Jersey, and in an attempt to balance the positives and negatives of the introduction of a minimum wage, the most

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appropriate minimum wage is lower than it might have been if the disproportionate impact on some sectors had not been taken into account.

It was agreed that in order to provide a decent wage for a fair days work for those who do not receive benefits in kind, especially local residents for whom the offset would not be applicable, a higher basic rate would be more appropriate. These workers on a low wage have to be able to afford to pay for accommodation, bills and food. Also, the higher accommodation rate is more in line with local accommodation prices.

As was the case with the initial rate set in the UK, many jobs were paid around the level of the minimum wage recommended by the Forum, particularly in the Hospitality and Agriculture industries.

#### *Recommendations for 1<sup>st</sup> April 2005*

- An initial minimum wage rate of £5.08
- A total off set of £74.20, to be split 75% (£55.65) for accommodation and an additional 25% (£18.55) where food is also provided.
- A trainee rate of £3.82, representing 75% of the recommended minimum wage rate.
- Based on a majority decision, the Forum did not recommend a separate Youth rate.
- It was also recommended that the minimum wage should be uprated in future years via an annual recommendation to the Minister following wide ranging consultation, unless there were significant changes in the employment environment that warranted an earlier review.

## **The Minimum Wage Review**

### *Background*

The Minimum Wage came into force on 1st July 2005 instead of the planned implementation date of 1st April 2005. As the minimum wage had been in force for less than four months when the first review was to be undertaken, the Forum distributed a short consultation document during October 2005. Responses were received from a range of respondents and those industries and employers who were most likely to be affected by an increase in the minimum wage were well represented.

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The extremes of view expressed in the consultation responses ranged from 'freezing' the current minimum wage rate, to increasing it to £8 per hour, but most respondents called for an increase.

Members agreed that the offsets and trainee rate should be increased in line with any increases in the minimum wage rate in order to retain proportionality; otherwise, the effect of any increase in the minimum wage could be unpredictable and likely to have a greater impact, mainly on the Agriculture and Hospitality industries.

At the time of the review, the Retail Price Index stood at 2%. The Forum agreed that to wait for the March 2006 RPI figure would not give employers adequate notice of a new minimum wage rate. The Forum anticipated that the RPI would rise and then fall between October and April, but would continue to average around 2%.

#### *Recommendations*

The modest increase of 3% was recommended to be applied to all rates, producing;

- A Minimum Wage of £5.24
- A Trainee Rate of £3.94
- An accommodation offset of £57.32
- An accommodation and food offset of £76.43

The Forum supported its original recommendation; to annually make a minimum wage recommendation to the Minister, following wide ranging consultation. However, in light of comments received during the review, the Forum agreed to give further consideration to the **timing** of the annual updating.

In view of their administration arrangements (pay increases, contract changes, tariff agreements, etc), some industries are more likely to be affected by the timing of changes to minimum wage than others. If April is an impractical month, the Forum agreed to reconsider and make an additional recommendation to the Minister in future.

The Forum also stated that it would give further consider to the trainee rate and therapeutic workers in the next review, when the codes of practice on these matters were more established. These are dealt with further in Section 4.

#### **SECTION 4 – SPECIAL ISSUES**

Two specific issues of importance were raised during the consultation as calling for more detailed consideration; the trainee rate and therapeutic work. When the Minimum Wage Review was undertaken in October 2005, codes of practice had recently been issued on both the trainee rate and therapeutic work and it was

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considered that a full review of the content would not have been practical at such an early stage. The codes of practice are available on the Jersey Advisory and Conciliation Service website [www.jacs.org.je/?tabid=269](http://www.jacs.org.je/?tabid=269)

The Forum is aware that a small number of employers have requested clarification of the criteria relating to trainees and therapeutic workers and that the Social Security Department and JACS have dealt with these queries. Some background information on each of these topics follows; the Forum asks for your views and comments in Section 5.

#### *Trainee Rate*

The Minimum Wage Regulations provide that the trainee rate may be paid to an employee only where the Social Security Minister has approved a course of training as 'accredited'. A code of practice was approved by the Minister in 2005 which sets out the criteria required for a training course to be accredited.

These include; the requirement for a formal qualification at the end of the training that is a locally or nationally recognised and certified qualification; that the training is of a sufficient quality and duration to enable the employee to reach the required standard to complete the course successfully; and that the training is provided at no cost to the employee.

In addition to the trainee rate code of practice, the Minister has recently approved an additional category of trainee, whereby if an employer agrees a structured programme of training at the beginning of employment and maintains a regular logging and reviewing procedure of that training (having first consulted the Training and Employment Partnership), the training is deemed to be accredited and the trainee rate may be paid. The intention is to allow the trainee rate to be paid where formal accredited training is not available (for example, in some specialised trades) and to encourage in-house training where that is the only, or most suitable, option.

#### *Therapeutic Work*

'Therapeutic work' is not a legal term. It is used to describe a number of arrangements whereby people who have difficulty functioning in the normal labour market are given the opportunity to undertake some form of work-like activity, for which they may receive payment, often whilst in receipt of benefits. Clients working in local schemes are often given a 'contract', are paid a 'wage' and are expected to attend for certain hours per week, which gives the impression of 'employment'.

Every therapeutic work arrangement is likely to be very different and must be considered on an individual basis. Therapeutic work is potentially problematic for the following reasons;

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- There is no reference in the minimum wage legislation to a worker's productivity, ability or effectiveness.
- The legislation also makes no distinction between disabled and non-disabled people and contains no reference to 'therapeutic work'.
- The basic criterion for determining whether anyone is entitled to the minimum wage and the protection of the Employment Law is simply - is he an employee?

If a person with any kind of disability or mental health problem is involved in work-like activity under an arrangement that is an explicit or implied employee's contract, then they must be paid the minimum wage and are entitled to the other protections of the Employment Law. The issues surrounding therapeutic work can be complex; however the code of practice appears to have assisted employers and therapeutic work scheme providers to determine whether a therapeutic worker is a 'client' (who is exempt from the minimum wage provisions) or an 'employee' (who is entitled to the minimum wage or trainee rate).

The code of practice provides four additional criteria that may be taken into account by an Employment Tribunal, which provides more certainty as to client/employee status. The intention of these criteria is to balance concerns for the protection of vulnerable workers, against the intention of the schemes designed to help in the provision of training, reintegration, work skills and experience. Employers and therapeutic scheme organisers can use the code of practice to arrange their work practices and the code may be referred to a Tribunal as a test of employment status.

All four of the following criteria must be met for work related activity **not** to be considered as 'employment';

1. The activity is demonstrably focused on needs of the individual rather than needs of the organisation (however it is permissible to derive some benefit from the activity, such as selling any output to offset costs). The activity should be intended and designed to serve the needs of the individual rather than the organisation.
2. The tempo of the activity, and of any output or delivery target, reflects the needs of the individual rather than those of the organisation.
3. The individual is referred to the activity and monitored/supported by a health or social care professional, (e.g. a GP, social worker, occupational therapist, charity worker).
4. The arrangement is agreed with the individual and not made over his or her head.



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It was anticipated that, due to the perceived risks for employers and the cost of paying the minimum wage, the Employment Law might create a negative effect on opportunities for therapeutic workers, such as a reduction in employers' willingness to take on therapeutic workers and a decline in the number of placements available. Since the Law has been in force, only a handful of queries have been received about therapeutic workers, most of which have related to the relationship between benefit entitlements and the right to receive the minimum wage.

#### *Accommodation and food offsets*

The Minimum Wage Review did not raise specific concerns about the accommodation and food offsets; however the ESSC had originally intended that employers should only be able to offset an amount for staff accommodation against the minimum wage, as in the UK.

During the preparation of its first recommendation in 2004, the Forum realised that the agriculture industry provides accommodation to most of its staff (almost 100%) and provides food only occasionally; however the hospitality industry typically provides food to the majority of employees as part of their accommodation package.

There were initially some concerns that an offset for food might be open to abuse in terms of the quality of food offered. It was recognised that it might be difficult to define what constitutes adequate food, which could lead to problems in regulating and enforcing the provision of food. However, in Ireland, three meals per day may be offset against the minimum wage and there do not appear to have been any difficulties with this aspect of the legislation.

There was also a suggestion that employers in other industries might begin to provide food, or that agricultural employers might increase the number of staff who are provided with food, in order to offset the full amount against employee's pay. As yet, there is no evidence to support this view.

The ESSC approved the Forum's recommendation for a food offset, with the proviso that the Forum review and report back specifically on this issue in a future review.

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**SECTION 5 – QUESTIONNAIRE**

1. Please tick which of the following you are responding as, or on behalf of;

- An employer - Small business (up to 5 employees)
- An employer - Medium business (6 - 20 employees)
- An employer - Large business (21 or more employees)
- Business/trade representative body or employers' association
- Trade union or staff association
- Social enterprise
- Local government/States department
- Individual employee
- Other (please describe)

2. If you are responding on behalf of an organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

3. What business, sector or industry are you involved with?

4. Your name, address and contact details (optional)

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**CONFIDENTIALITY**

**Please tick any of the following that you agree with;**

In the reporting of the results of this consultation, I am willing to allow the Employment Forum to quote my comments;

- Anonymously      Or       attributed to me
- I am willing for my responses to this consultation, to be made available in full to the public.
- I am willing for my consultation responses to this consultation, to be made available in full to the Scrutiny Office, if requested by them. For more information about the role of Scrutiny, see the website [www.statesassembly.gov.je](http://www.statesassembly.gov.je)
- I am willing to discuss my responses further with the Forum, if necessary. If so, please write your telephone number or email address below

- I would prefer to receive all Forum consultation papers via email in future, instead of paper copy - please write your email address below

- I am willing for my name and address to be included on a consultation database to be held by the **Social Security Department**, so that I am included in any future consultation on employment legislation carried out by that Department, as well as by the Employment Forum.
- I do not wish to receive consultation documents issued by the Forum in future.
- I wish to amend or add recipient details for all future consultation papers. If so, please write the new recipient name and address below.

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*Thank you for taking the time to complete this survey.*

The following questionnaire has been divided into five parts;

- PART 1 - General questions
- PART 2 - Effects on Businesses
- PART 3 - Trainee rate
- PART 4 - Therapeutic work
- PART 5 - Accommodation and Food

*In answer to the following questions, please give as much detail as possible, using the comment boxes or extra pages to provide any additional comments and including examples where appropriate.*

*Please leave blank any questions that you feel do not apply to you.*

*If you are not sending a typed response, please write as clearly as possible.*

**PART 1 - GENERAL QUESTIONS**

1. Please describe any impact the Minimum Wage has had on you personally, your members, your business or industry.

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2. What rates do you think should be effective from 1<sup>st</sup> April 2007;

Minimum wage <i>(Currently £5.24)</i>	£
Trainee rate <i>(Currently £3.94)</i>	£

Please give any reasons for your responses.

3. The only benefits in kind that may be offset against payment of the minimum wage are living accommodation and food (defined as 3 adequate meals per day) What rates do you think should apply as a maximum weekly offset from 1<sup>st</sup> April 2007?

Offset for accommodation <i>(Currently £57.32)</i>	£
Offset for accommodation and food <i>(Currently £76.43)</i>	£

Please give any reasons for your responses

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4. What impact do you think an increase in the minimum wage would have on you personally, your members, business or industry?

5. What method should be used to set new minimum wage rates in the future?

- Annual increases in accordance with an index or prescribed formula
- Annual recommendation by Forum after reviewing economic circumstances
- Annual increase by an index/prescribed formula with regular (but not annual) reviews of local economic circumstances
- Other method, please specify below

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6. If you have responded that the minimum wage should be updated by a formula, what index should be used? *Please specify below.*

7. The minimum wage is currently updated on 1<sup>st</sup> April. If it would be more appropriate for you if the minimum wage was updated in a different month in future years, please specify below which month and give a reason for your response.

**PART 2 - EFFECTS ON BUSINESS**

8. Has the July 2006 increase in the minimum wage had an impact on your total pay bill? (*Please tick one of the following options*)

- |  |   |
|--|---|
| <input type="checkbox"/> No significant change     | <input type="checkbox"/> Increased by 5 to 10%      |
| <input type="checkbox"/> Increased by less than 5% | <input type="checkbox"/> Increased by more than 10% |

9. Have you increased the pay rates of higher grade staff (e.g. supervisors) to maintain pay differentials as a result of the July increase in the minimum wage?

- Yes                       No

10. How many employees do you employ in the following age groups?

- Under 16                         16 to 18                         Over 18

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11. Have you provided job related training to your workers in the following age categories in the past year?

- |              |                              |                             |
|--------------|------------------------------|-----------------------------|
| Under 16     | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Age 16 to 18 | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Over 18      | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

12. Have you made use of the option to pay employees the trainee rate of £3.94 per hour?

- Yes                       No

13. If yes, as a result of using the trainee rate, have you increased the amount or quality of training that you provide?

- Yes                       No

If yes, please give more details below

14. There could be many reasons why employers do not use the trainee rate, some of which are listed below. Please tick any that are applicable to you.

- |  |                              |                             |
|--|------------------------------|-----------------------------|
| (a) Recruits already have the skills needed    | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (b) Was not aware of the trainee rate          | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (c) Too complicated to administer              | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (d) Code of practice criteria not clear enough | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

*Continued on page 17...*



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- (e) The rate doesn't make it worthwhile to train  Yes  No
- (f) Hard to recruit at this rate of pay  Yes  No
- (g) Paying trainees less would be unfair/divisive  Yes  No
- (h) Not appropriate for this business  Yes  No
- (i) Other, please specify

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15. Has the minimum wage had any of the following effects on your business?  
*(please tick where applicable)*

	<b>Significant</b>	<b>Slight</b>	<b>None</b>
Lower staff turnover			
Higher staff motivation			
Faster filling of vacancies			

16. Have you changed any of the following in your business as a result of the minimum wage?

	<b>Significant increase</b>	<b>Slight increase</b>	<b>Slight decrease</b>	<b>Significant decrease</b>	<b>No change</b>
Overall staffing levels					
Basic hours					
Overtime hours					
Overtime rates					
Bonuses, commission and tips					
Other non-wage benefits					

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17. Has the minimum wage led to changes in any of the following in your business?

	<b>Significant increase</b>	<b>Slight increase</b>	<b>Slight decrease</b>	<b>Significant decrease</b>	<b>No change</b>
Profits					
Prices/tariffs					
Changes to control labour costs (e.g. pay for absence, overtime, breaks)					
Measures to control non-labour costs (e.g. costs of supplies, marketing)					
Use of new technology or processes					
Quality of goods and services					
Introduction of new products or services					
Use of unskilled or unqualified labour					

18. In your business, has the minimum wage led to any of the following changes in your employment of therapeutic workers?

No therapeutic workers employed

	<b>Significant increase</b>	<b>Slight increase</b>	<b>Slight decrease</b>	<b>Significant decrease</b>	<b>No change</b>
Number of therapeutic workers employed					
Number of hours worked					
Contractual entitlements provided, e.g. holidays					
Hourly rate paid					

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**PART 3 - TRAINEE RATE**

19. If you have used the 'Minimum Wage - Trainee Rate' code of practice, has it helped you to understand what is required of an employer to justify paying an employee the trainee rate instead of the full minimum wage rate?

Yes     No     Haven't used it

If no, please give a reason for your response to help us make improvements where necessary.

20. In addition to meeting the criteria set out in a code of practice, training may also be accredited if an employer agrees a structured programme of training at the start of employment and maintains an adequate logging procedure of that training. (See *page 7 for more information*)

Would this new method of accrediting training via a logging procedure be useful in your business?

Yes     No

Please give a reason for your response

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21. Are there any other types of training that are not currently accredited for the purposes of the trainee rate that you think should be accredited?

Yes     No

If yes, please describe the type of training

22. The trainee rate is payable **only in the first year** of employment with an employer. *(This applies to all trainees over age 16, including full time, part time, Saturday and school holiday staff).* Do you think this provides sufficient flexibility for employers to provide training and pay the trainee rate?

Yes     No

Please give a reason for your response

23. Apprentices are usually paid according to trade federation rate scales, which are different from the trainee rate, however apprentices are not exempt and must be paid either the minimum wage or trainee rate. Has this caused you any difficulties?

Yes     No

Please give a reason for your response

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24. Do you have any additional comments about the trainee rate?

25 (a) Do you think that there should be a youth rate as well as the trainee rate?

Yes     No

(b) If yes, what should the rate be?

£ \_\_\_\_\_

Please give any reasons for your response

**PART 4 - THERAPEUTIC WORK**

26. If you have used the *'Therapeutic Work and the Employment Law'* code of practice, has it helped you to understand whether a therapeutic worker is to be treated as a client, or as an employee? (See page 7 for more information)

Yes     No     Haven't used it

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If no, please give a reason for your response to help us make improvements where necessary.

27. Do you have any other views on, or direct experience of, the impact of the minimum on therapeutic workers?

**PART 5 - ACCOMMODATION AND FOOD**

28. Have you made use of the option to offset a maximum amount of £57.32 against your employee's weekly pay for the provision of **accommodation**?

Yes

No

29. If yes, as a result of the ability to offset this amount;

(a) Have you increased the number of employees who are provided with accommodation?

Yes

No

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(b) Have you increased the quality of employee accommodation that you provide?

Yes

No

(c) Are utility bills included in the accommodation offset, or do you charge extra for such bills. Please give details.

Please give any reasons for your responses to questions 28 and 29.

30. Have you made use of the option to offset a maximum amount of £76.43 against your employee's weekly pay for the provision of **accommodation with food** (defined as 3 adequate meals per day)?

Yes

No

31. If yes, as a result of the ability to offset this amount;

(a) Have you increased the number of employees who are provided with food?

Yes

No

(b) Have you increased the quality of food that you provide for employees?

Yes

No

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Please give any reasons for your responses to questions 30 and 31.

32. If you have any other comments, concerns or suggestions about the minimum wage that have not been covered by any of the previous questions, please write them below and include additional sheets of paper if necessary.

***Thank you once again, your comments are invaluable to the work of the  
Employment Forum.***

**The current members of the Forum are:**

Wendy Malorey  
Sally Johnson  
Melvin Le Feuvre  
Tina Palmer  
Brendan Renehan  
Carol Le Cocq  
David Robinson  
Jan McCarthy