

8 January 2016

Low Pay Commission
Room 207A
Davitt House
Adelaide Road
Dublin 2
D02 TW27

Re: 'Consultation' on sub minima rates

Dear Sirs,

I refer to your email of 18 December 2015 seeking submissions in relation to a 'consultation' process initiated by the Low Pay Commission on December 4 in relation to the appropriateness of sub minima rates for young people as provided for by the National Minimum Wage Act.

I am not surprised that the Commission's initial advertisement of this 'consultation' process did not elicit many replies as the basis on which the consultation exercise is being conducted is grossly deficient. Normally a consultation exercise is carried out around a set of proposals or an Issues Paper which sets out the context and background to the issue. It also outlines the facts, figures and trends identifying the legal and policy parameters on the particular issue and in respect of which the information and participation of external stakeholders is being sought.

In this case there has been no such information provided – instead we are asked to comment generally on "the appropriateness of the sub-minima rates with regard to their impact on youth unemployment rates and participation in education". There is no information provided on the impact of the rates on youth unemployment rates or participation in education and consequently we are being asked to opine on an unspecific and very general issue.

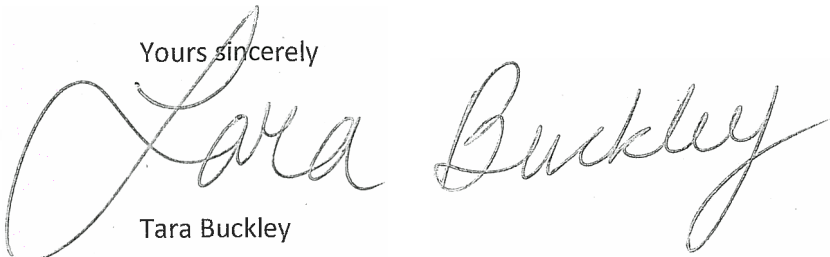
If the Low Pay Commission is to perform its functions effectively and to seek the views of stakeholders with an interest in the issues under review, it behoves the Commission to present properly structured and informed consultation processes, rather than just throw out general themes for discussion and subjective assessments.

The issue which is purportedly at the basis of the consultation exercise is one of importance to RGDATA members. The retail outlets represented by RGDATA do provide many young people with part time holiday work, giving them their first taste of work and often funding students through their studies, thereby aiding participation in education. There is no indication at present that the rates of pay for these people is presenting any problems or challenges, either in respect of this cohort of workers or other workers.

If the Commission believes that there are any such issues, then it is important that these are outlined and people given a chance to make submissions on the views and findings presented by the Commission.

If the Low Pay Commission provides some research analysis of the sub minima rates, youth employment/unemployment data and participation in education, RGDATA will certainly make a submission with our members' views on the findings.

Yours sincerely

A handwritten signature in cursive script that reads "Tara Buckley". The signature is written in dark ink and is positioned to the right of the typed name.

Tara Buckley
Director General
RGDATA

CC Minister for Business & Employment Ged Nash