

The Scottish Women's
Convention's response to the Low
Pay Commission's consultation on:

National Minimum Wage



June 2022

Premise

The Low Pay Commission (LPC) is the independent body which advises the UK Government on the levels of the National Living Wage (NLW) and National Minimum Wage (NMW). To help shape the recommendations made this autumn on the 2023 minimum wage rates, the LPC is seeking evidence on the impact of the NLW and NMW.

From 1st April 2022, the NLW will increase from £8.91 to £9.50. The LPC's recommendations on the NLW will be guided by the Government's target for the rate to reach two-thirds of median earnings by 2024, taking economic conditions into account.

For the remaining NMW rates (the 21-22-Year-Old Rate, the 18-20-Year-Old Rate, the 16-17-Year-Old Rate and the Apprentice Rate) the LPC's recommendations will be based on their usual approach of raising the rate as high as possible without damaging employment.



The Scottish Women's Convention (SWC)

The SWC is funded to engage with women across Scotland to ensure that their views are represented in policy and decision-making processes. The SWC uses the views of women to respond to a variety of parliamentary, governmental, and organisational consultation papers at Scottish, UK and international levels.

The SWC gathers information using different methods, including roadshows, thematic conferences, surveys, and both in-person and online roundtable events. This submission presents the views of a range of women, reflecting their opinions, ideas and lived experience. Working together with many other equalities organisations and community groups, we use our broad network to ensure that women from a range of backgrounds are heard and acknowledged. We are continually reviewing innovative ways of engaging with women and developing our trauma-informed and culturally sensitive practice to support vital contributions from as many women as possible.

Economic Outlook

1. What are your views on the economic outlook and business conditions in the UK over the next 12-24 months?

Of the women we spoke to, their primary concern for the coming year was inflation and the increasing the cost of living for everyone:

- “Inflation is limiting people’s spending and therefore impacting on small businesses.”
- “People who work are unable to pay the fares to get to their place of work because of increased fuel, food, and heating prices.”
- “I think a full recession is inevitable at this point; inflation is through the roof and people simply cannot afford to spend their money on anything other than the bare essentials.”
- “Food, fuel, transport and living costs, plus disrupted supply chains and availability of food, services, products, etc. They will fundamentally impact on women's everyday lives and ability to work, feed themselves and their families and to enjoy life!”
- “People won’t be able to go out and enjoy themselves as their bills will have increased so much.”
- “Everyday spending that cannot be influenced by the individual: fuel, rent, mortgage, utilities, food. It'll be a constant pressure on people. It will be disconcerting for everyone, from those used to balancing spend very carefully every month to those newly affected by rising costs.”

There was a strong sense that the Government’s response to support households has not been good enough and people are being forced into poverty:

- “There is an unacceptably huge percentage of households trapped in increasing intergenerational poverty.”
- “The Conservative Government are not giving enough help to support people during this cost-of-living crisis.”
- “It will mean more people will find it hard to secure basic needs like a home, food, transport and access health in a timely way.”
- “I expect the cost of living to continue to soar because, let's be honest, the Tories aren't going to do anything to really help. I also expect the cost of food to continue to rise, pushing even more families to food banks.”
- “A perfect storm, that will lead to trouble on the streets, the old and infirm dying, and many families starving & freezing.”

Increased poverty will in turn reduce women’s capacity to participate in the economy:

- Women cannot function properly when they are malnourished.
- Women cannot afford the electricity costs of having to work from home, yet many employers are neither subsidising these costs nor giving the option to go into an office.

- The extreme stress and uncertainty tangibly affect cognitive function and leads to poor mental health and wellbeing.
- Living in cold, insufficient housing can lead to illness and therefore time off work.

Women shared a range of factors that they felt were contributing to the rising cost of living:

- The war in Ukraine and movement away from Russian gas
- Brexit (particularly the supply issues)
- Net Zero targets
- Tax increases

Women also felt that the aftermath of the pandemic will continue to affect the economy:

- “More things are opening up again after covid so visitor numbers going up in tourist spots.”
- “There is still increased violence against women after the pandemic and this limits how women are able to work, either because of time off to deal with physical injuries or because of controlling partners who won't let women work.”

2. To what extent have employers been affected by other major trends in the economy and labour market: for example, rising energy costs, Brexit, the shift to homeworking or changes in the numbers of migrant workers in the UK.

- “The National Insurance rise and business costs going up has meant businesses are less able to offer the wage increases necessary to support people with the rising cost of living.”
- Some women have reported that their employers are giving them a supplement/bonus this autumn to help with rising energy bills. While this is welcome, it raises issues around:
 - The Government's responsibility to support people through social security.
 - Why these businesses do not give their workers permanent and contractual pay rises if they can afford these supplements.

3. What is your experience over the past year in the following areas?

c. Productivity

Women are tired of being undervalued and cannot continue to have their goodwill exploited.

- “Public-sector pay and conditions will become a bigger issue over the coming months and years. Despite lip service paid to covid shifting our priorities

towards valuing what is beneficial to society, the opposite has been facilitated. The state has relied too long on the goodwill of workforces such as health workers, public servants, social care workers etc. The cost-of-living crisis is increasingly making it impossible to live on the low wages we reward this with. Those who can, will leave for better paid work, and those who can't may choose industrial action, but there will be backlash either way."

d. Pay structures and differentials

Women across many sectors feel that wages have not been keeping up with inflation over the last year.

- "In the third sector, there was no matching up. I was told the SCVO would release salary increases based on inflation but, so far, it hasn't happened."
- "The third sector is traditionally very poorly paid in comparison with the statutory, private and government sectors, which is disproportionate and unfair given the volume and quality of work done by the third sector, particularly the VAWG sector."
- "The NHS has been lagging behind with wage increases for a number of years now."
- "I work in the NHS; for years, cost of living pay awards were frozen, now they remain low, which ultimately results in skilled NHS staff being underpaid."
- "In Higher Education, we're lucky to see a 1-3% increase whilst genuine inflation is 5 times that. My employer prides themselves on being a "living wage employer" however I don't see much space to live beyond the bare essentials for those on lower wages and with financial dependents."
- "In the civil service where I work, pay in no way keeps pace with inflation or reflects demands more of us. Recruitment remains inaccessible to many, and workforce is increasingly overworked unhappy and underpaid."
- "Despite the NI contributions increasing and prices increasing, the salaries within my organisation didn't change. So, although I took this job because it paid more than my last one, with the inflation and high energy costs I actually got a massive pay cut."

There is definitely a gendered nature to poverty and low pay as sectors such as care and hospitality, where women predominate, have some of the lowest pay and worst conditions.

- A recent survey of GMB members in the care sector demonstrated that 70% were not earning enough to live on so are relying on family, overdrafts or credit cards to survive.
- Many women working in the care sector are working 80+ hours per week to make up for their low hourly pay and make ends meet.
- This is highly skilled work and lives are at risks if women cannot make it to work. This is why care-workers are undertaking a campaign for £15/hr.

f. Quality of work, including contract types, flexibility and work intensification (e.g. greater expectations for workers to work more flexibly, with greater effort, to higher standard etc)

Work Intensification

- “Where I work has stopped hiring and does not replace people who've moved role or retired, meaning an increasing workload is spread across fewer people.”
- The mass redundancies in hospitality during the pandemic mean that some women are working the job of 3 people for the same money.

Precarious Contracts

- “Low contracted hours, with no guarantee of how much you will earn each week, really hold women back.”
- “Zero-hour contracts are very unstable, and it's a very competitive job market which asks for lots of experience but pays little. There's abuse and harassment at work but we have to stay in a bad environment because of lack of choice.”

Work-life Balance and Workers' Health

- Women are concerned that health, especially mental health, is really suffering as a result of the increasing stress of low pay and work intensification.
- “There should be no zero-hour contracts, plus better sick pay and benefits such as gym incentives so people can afford to have hobbies after work while keeping themselves healthy.”
- “People will be less likely to take time off when they're sick and will continue to work when unwell. People will be taking on additional hours and jobs to try to make the shortfall in rising costs. People's health, wellbeing and mental health will be detrimentally impacted.”

g. Progression and job moves

In low-paid sectors like hospitality, women have reported that there is little to no opportunity for progression, and experience is not valued.

- One woman had worked in the same restaurant for more than 15 years and did not receive a single pay increase in that time. As a single-mother working 60+ hours per week, she explained that she had no time for professional development or to look elsewhere.
- In many restaurants and bars, managers are only paid 20p more and even those at the highest grades on the floor will only be paid £13/hr. This is little incentive and is part of the reason for the transience within the workforce.

4. Apart from the minimum wage, what are the key drivers of pay decisions in low-paying sectors and occupations? For example, this could include the cost of living, availability and retention of staff, changes to Universal credit/other benefits or access to transport.

Retention

- “Since Brexit, there appears to be a shortage of workers and it’s difficult to get people to stay.”
- “NHS pay is depleting each year, and we will ultimately lose skilled professionals as a result.”

Cost of Living

Women felt that employers should be doing a better job of engaging with workers to see how pay is matching up to the cost of living.

- “I think all businesses need to speak to their workers and find out how they are managing. This might help businesses show how they can perhaps help.”
- “My organisation usually gives a cost of living raise each year but was unable to this year when it was potentially most needed.”

There was also a lot of evidence of that the rising cost of living, especially fuel, transport and childcare, is impeding women’s capacity to get to work.

- “Childcare costs are very limiting in the work you can get.”
- “Childcare cost are out of the reach for most individuals especially single parents; job opportunities are there but sometimes the wages don’t meet outgoings.”
- “Childcare costs will make this less likely for people to work and may cause some to stop working altogether.”
- “I have friends who are carers and they’re getting that way where they can’t afford to fill their tank up with petrol to get out and do their job.”
- “I’m starting to think I won’t be able to afford to get the bus into work the way things are going.”

Workers’ Demands

- “I work in construction, and it is very much about having the confidence to ask for a wage rise, or it’s not given to you.

Hiring

- “I am seeing lots of charity organisations struggle to hire new people or keep them just because the salaries are not enough to cover what we could afford pre-pandemic.”
- “Whereas previously we’d get numerous applications we’re now maybe only getting one or two in, so that’s been an issue for us and we’re not actually clear why. We sometimes get requests when we’ve put out posts ‘can this post be delivered online?’ and we very clearly say ‘no, it will largely be a face-to-face post’ and then we don’t get an application back.”

Flexibility of Working

- “I think the situation of remote and home working will be a big factor in people's choices as an employee depending on individual lifestyles and preferences. I think organisations that encourage back to work in office may become younger over time because young people are wanting networking and social opportunities whereas those with children prefer the flexibility of home working.”
- “Better to have people in work rather than not, but flexible working methodologies are needed to encourage more people.”

5. What has been the impact of the NLW in the past year? Our critical interest is in its effects on employment, hours and earnings.

Women do have concerns that increasing the NLW will mean worsening conditions and employment practices to mitigate the costs to employers.

- “I think it is right that the minimum wage increases, but I also worry this won't translate upwards and more people will be recruited to minimum wage and wages may stagnate above this.”

6. To what extent has the NLW affected different groups of workers, particularly those with protected characteristics (for example women, ethnic minorities and those with disabilities) and migrant workers?

Women

The women we spoke to concurred that the gender pay gap is getting worse.

- “It's getting worse. Why are we still talking about this in 2022? It's not 1922 or even 1962 so what is going on?”

As well as like-for-like wages, we must also address the social factors that mean women do not progress to positions where they can earn as much.

- Prohibitive childcare costs limit women's access to paid employment.
- “In my workplace, several women have left to care for their own children or grandchildren rather than pay childcare costs. It's the women in the lowest paid roles that are moving out of the workplace.”
- “The gender pay gap is 100% real and the majority of it is due to women taking time off for maternity leave where their male counterpart will then work their way up. There should be equal maternity and paternity that can be shared.”
- “Broadly, the causes aren't changing and without sustained ambitious intervention, particularly around childcare and wider caring, it will remain. The Scottish Government had a strong vision, but the execution lost focus and momentum and it hasn't been mainstreamed. It is not seen as a priority.”
- “There is also the impact that still happens of women having children and how this can interrupt career progression. Men also have children and do not feel

the impact of this. Greater societal uptake of things like shared parental leave, child friendly employers and flexibility in working patterns would help support this.”

More needs to be done to address the fact that sectors where women predominate are systemically underpaid compared to those where men predominate.

- “There needs to be so much more support so that jobs which are mainly done by women get government backing so the salaries are higher. So many people working in caring and service sectors get paid so low compared with anyone working in IT or STEM jobs, but so much responsibility goes into caring for someone. There is also a lack of proper explanation of what the gender pay gap is, so more public information is needed.”
- “In Banking Tech, the gap can be upwards of £50,000 p/a.”
- “It is overlooked in the NHS. The clinical staff are predominantly female; these roles are viewed as caring roles, which society deem appropriate for women, thus they are poorly paid. Historically most doctors were male, and there is a significant pay gap between doctors and other skilled clinicians in the NHS, and this is due to the gender pay gap.”
- “Looking at some businesses, it’s all men at the top anyway so not going to change any time soon.”
- “For me the issue is in the lack of economic value typically demonstrated towards majority female professions. When I worked in nurseries (early years), the pay was dismal and not at all comparable with other skilled professions which also require qualifications.”
- “We need more apprentice or intern opportunities for women in male dominated jobs.”

Age

Older women felt that their contributions were not valued, and they struggled to find employment.

- “Older women have had much fewer employment and career opportunities, due to the fact that their role was viewed as housewife/carer.”
- “Employers will purposely avoid employing older people to avoid paying them a fair wage.”
- “It’s the women who are 50+ who are the ones that have been keeping us all going, keeping us alive, and doing all the services on the frontline and care and schooling. They’re getting it from all angles, and they’re expected to cope and get on with it without a decent wage.”
- Many low-paid jobs are not accommodating of older women’s needs such as health conditions and menopause.
- “Bullying of older workers and they’re continually being undermined at work is not making the best of their talents and experience.”

A lot of WASPI women who were expecting to retire have had to retrain and go into minimum wage jobs.

- “Older men are seen as more experienced and able to take on challenges but women in the same age group are not treated with the same respect.”
- The Scottish Pensioners’ Forum’s recent survey showed that 46% of older adults planned to retire at 60 but had been forced to change their plans, and 28% wanted to retire but could not afford to.

However, women also acknowledged that there is discrimination against young workers.

- “We also have an age pay gap as employers bring in less favourable contracts which generally disproportionately impacts younger people and will further impact young women.”

Migrants and BME

Systemic racism means that BME and migrant women are disproportionately in lower paid jobs.

- “Discriminated against groups like BME are trapped at that economic level.”
- “I think women of colour and migrant workers are paid less.”
- “Those who are BME are disproportionately impacted due to their overrepresentation in minimum wage positions. I think this a foundational issue which needs to be considered: how do we support people to have more equitable access to employment and good employment more widely?”
- “There is an overrepresentation of ethnic minority groups in minimum wage jobs, even when they have the qualifications to get better paid jobs. Migrant people and BME communities might find themselves always struggling to barely afford the very basics, without access to a better quality of life.... In my neighbourhood where the majority of people are from BME and/or migrants, that landlords are enforcing evictions because they want to repossess homes to sell them. This means families are out on the streets and will likely have to move further out in the city because there is a shortage of affordable rentals. This splits the community, and they might need to spend more money relocating and commuting to work, so all in all their quality of life is completely at risk.”
- There is still the huge issue that many women have no recourse to public funds and cannot access paid employment, leading to destitution.

Disability

Many disabled women are excluded from paid employment and there are still many barriers to their participation.

- Many disabled women are forced to take on part-time or flexible contracts to adapt to the nature of their condition. However, these types of contracts tend to be the lowest paid.
- “Disabled people often have additional expenses in their lives (such as electricity needed to charge wheelchairs, accessibility adjustments or

medical equipment) yet there is very little recognition of this, and this is not reflected in their wages.”

- “I have encountered fears and unwillingness to employ people with accessibility or reasonable adjustment requirements due to the economic cost to the organisation e.g., updating fire alarms for deaf individuals.”

7. How has the NLW's impact varied across different geographical areas of the UK?

The cost of living tends to be a lot higher in island and rural communities, meaning that wages do not go as far.

- “There is a high cost of living. I would say between 40-60% higher than the mainland UK.”
- “Wages seem lower than other parts of the UK despite the cost of living being substantially higher than most of the UK.”

Poor infrastructure in island and rural communities, such as lack of affordable transport and childcare, can limit employment opportunities and reinforce gender stereotypes.

- “Poor transport links due to rural location means you need a car (or even a car for every working adult) which is more expensive.”
- “The dispersed population and limited types of employment opportunities available in small communities means that quite often there is a lack of childcare and only part time job opportunities available, and these are often in gender stereotypical roles e.g., care, catering, and cleaning.”
- “There could be central community hubs with crèche options and working spaces so parents could be working nearby their children rather than facing a 20+ mile commute to the central town to work. This could then help parents access work whilst also doing the really important things like being involved in community activities or school and pre-school activities.”
- “Childcare is still an issue as, in the majority of families, it is the mother who doesn't work, or takes low paid work to fit around their family. On Mull, there is no nursery and only one registered childminder, so many mothers juggle work with informal childcare arrangements which aren't sustainable.”
- “We need funding targeted specifically at women. Women are still earning less, still being paid less, still taking the main responsibility for child and elderly care, and so have less ability to build up capital to work with.”

The seasonal nature of much of the work in island and rural communities means a lot of women face precarity, and the closed nature of island labour markets means that employers can exploit this.

- “It is hard earning enough money all year round to remain here.”
- “There is a lack of secure work, because of seasonality and a lack of opportunity.”

- “All the women I know are very busy, for example I have multiple jobs and a husband who often works away, plus children. I’m looking for secure employment, but it’s not easy.”

8. The Government’s remit for the NLW is based on achieving a target of two-thirds of median earnings by 2024. Based on forecasts, our current central projection for the April 2024 NLW rate is £10.95. What are your views on this target?

While women welcome any rise to the NLW, we see real issues with the way these projections are calculated.

The NLW must be calculated in relation to the cost of living; it cannot be called a National ‘Living’ Wage if people cannot afford to live on it.

- In-work poverty is rising, especially among single-parent households which are predominantly women.
- “This will not be enough, for those living in cities especially.”
- “Not good enough. After tax, NI and pensions, you'd be lucky to see £1200 a month. For anyone who is financially independent and/or has children, this would never be enough. The average rent in my area is now over £600 and council tax continues to increase.”
- “This is just so low compared to the cost of everything... Living in dignity means being able to afford more than just the basics, and at the moment it feels like the Government just wants everyone to get a house and food, but that's just not enough.”

Across the board, wages are not keeping up with inflation and workers are facing real-term wage decreases. While most workers are so chronically undervalued, and even those earning more than the NLW cannot pay their bills, basing the NLW on median wages is not appropriate.

- “Inflation is at 9% but wage rises are not matching that. This is on the back of 2 years where we didn’t get pay rises because of covid but had to continue working and placing ourselves in danger.”
- “I would say my salary would be considered very reasonable (for an entry level job) but, in the last 3 months, I’ve been really struggling with electric and gas bills, food prices etc. I’m living pay cheque to pay cheque and unable to save money.”
- “These rates go up which is great (though not enough) but that does not help others who are just above this rate.”

Moreover, the calculation of the hourly rate is premised on the idea that a minimum number of contracted hours will be paid at this rate for someone to be able to live on this wage. There must be an end to zero-hours and other precarious contracts to ensure women can earn enough to live on.

- Women predominate in sectors such as hospitality, retail and care which still operate zero-hours contracts.
- Precarious contracts can mean a fluctuating income from month to month. This can interfere with benefits such as Universal Credit which operate a month behind as women may be sanctioned in a month where they did not earn over the threshold.

Women also believe there needs to be an overhaul of wage structures because disparities between the richest and poorest need to be tackled.

- “I think there should be a better relationship between the highest and lowest paid in a company.
- “I don't like how there is increased inequality with some people earning super high salaries and others earning very low ones.”

Many women want to see UBI implemented to provide more financial security for everyone.

- “I strongly believe UBI is our only hope for a better society.”
- “There needs to be a revision of welfare toward Basic Income principles. This is the only thing that will bring the mental health benefit of income security.”

10. At what level should the NLW be set from April 2023? Our current central projection for the on-course rate is £10.32.

Women expressed that the figure needs to be higher.

- “Quadruple that amount at the very least.”
- “If it does not match inflationary increases, then it is unacceptable.”
- “The rise is insignificant in comparison to inflation, and it can't be called a real living wage.”

Young People

12 Last year saw the creation of a new 21–22-Year-Old Rate, to remain in place until the NLW age threshold is lowered again to 21.

b. When do you think the NLW age threshold should be lowered to 21? What factors should we consider in making this decision?

Women demand an end to age discrimination and want to see a universal NLW rate. The age threshold should be lowered to 16 as soon as possible to tackle inequality for young workers.

- “Younger people who have rent and bills to pay are not getting paid enough due to age being a factor in how much they get paid an hour. I think minimum wage should be the same regardless of age.”

- “Everything costs the same regardless of your age. Bread isn't cheaper because you are 17.”
- “A bag of the same shopping, energy prices and housing costs are not any cheaper because you happen to be younger.”
- “I don't see any reasonable justification to pay a young person less if they are doing the same job.”
- “Everyone should be paid the same. The lower wage for under 21s is an insult to the hard work they do.”

However, a small number of women did caveat this by suggesting there still needs to be a way to reflect a person's experience through the NMW.

- “Younger people don't necessarily have the same experience as older people so that would discriminate against older and more experienced workers if younger workers were paid the same.”
- “It does depend on the job as some people could have gained a lot of experience by the time they're 21.”

13. How widely used are the other NMW youth rates (the 18–20-Year-Old Rate and the 16-17-Year-Old Rate)?

Women shared how these rates are used to exploit young workers.

- “A job I had fired me before I turned 18 so they didn't have to pay a higher wage!”
- “You understand that people will have less life experience and skills, so it is possibly justified. However, there are some employers who try to keep a young workforce, with the sole purpose of keeping costs down.”
- “I think people should be paid the same for the same job, especially as having different rates can often result in preferentially employing younger people for the economic savings and move employment away from others.”
- “These proposals are appalling. The minimum wage for 16–17-year-olds should be at least £10 per hour and, for 18 plus, I think £20 per hour.”

Apprentices

19. At what level should the Apprentice Rate be set from April 2023?

Women were appalled by how low the current and proposed rates are for apprentices and wanted to see a significant increase as soon as possible.

- “That is slave labour.”
- “Try multiplying that by 8 then you'll be somewhere close to sensible.”
- “Should be higher than this; there should be an incentive to progress.”

- “£4.81 is an appalling rate for anyone, let alone apprentices. An apprenticeship is not an easy graft, and the workers should be paid according to their work, not their age.”
- “The apprentice rate should be at least £7.”
- “It should increase because young people are learning at the same time so doing double the work of some people.”

Women felt that this figure has been calculated with the assumption that apprentices will not be living independently, but that is not the case for many.

- “It's too low. Yes, they are there to learn, but the amount of time a young person spends at their apprenticeship doesn't leave much time to find other sources of income. It just isn't a liveable wage. Having such low rate almost assumes that the apprentice has a good support network to be financially supported while completing the apprenticeship, but the reality is that many young people don't have that.”
- “This is too low if you have to provide for yourself.”

The point was also raised that many this does not only affect young workers since changing labour markets mean that many people are having to retrain later in life.

- “I can understand an apprentice rate being lower as they are not technically delivering the same level of work as a fully qualified person, and it incentivises employers to bring on apprentices and train them. However, I do think it should be enough to live on (without the assumption of living with wider family) as many people are looking to retrain.”

Compliance and Enforcement

20. What issues are there with compliance with the minimum wage and what could be done to address these?

Many women shared their experience of employers who did not comply with the NMW.

- “Some employers certainly don't pay their staff enough. I know first-hand how many employers in hospitality will pay their workers cash in hand to A: avoid tax and B: pay below the minimum wage for young staff. Migrant workers are also exploited massively by employers who avoid paying NMW.”
- “Every year there is evidence of companies failing to pay the minimum wage. In 2021, this affected circa 12,000 people.”
- “Anecdotally, I can say that it's not enforced and, locally, some employers use tips to make up rates.”
- “I think a lot of employers, especially in the voluntary sector, don't pay enough. They rely heavily on people's goodwill and play the moral high ground when anyone attempts accountability.”
- “There are expectations in my sector of an 'extra mile' approach, where we work extra hours often for just TOIL. Contracts are often 15 hours, but they

need to be 16 to claim benefits. I require top up benefit, housing benefit and tax credits, but that shouldn't be the case when I'm working."

Women were cynical of compliance processes and were scathing of the Government's commitment to genuine enforcement.

- "The minimum wage is not being enforced effectively and some employers are not paying workers enough. However, nothing will ever be done about it because Westminster doesn't care about lower paid people as they are of no interest or use to the current Government apart from as work fodder."

Accommodation Offset

27. What approach should we take in recommending the offset rate in the future?

Many women argued that there should not be an offset and a minimum wage should apply for every worker.

- "They should still get the Minimum Wage with no deductions."
- "Tying wages into property should be illegal."
- "Salaries should be paid as they are and not cut down based on factors like age or whether people receive accommodation. The Minimum Wage is already too low."

There was concern about the way the offset can be used to exploit workers, especially migrant workers or other vulnerable groups.

- "Whilst the premise may have good intentions, I feel like it opens up a lot of workers to exploitation and under-payment. Especially migrant workers on farms who may end up shoved in a caravan with five other people with absolutely zero quality of living."
- "It is not appropriate to use this offset because inevitably it will be applied against people in the lowest earning bracket and workers may be required to live on-site because of the requirements of the job."

Women also highlighted how this offset raises the broader issue of the need to unaffordable accommodation.

- "It's not fair however it is very hard to find accommodation in some places. We need cheaper accommodation for young people."
- "Pay a decent wage and give such accommodation at a very low rent or free. If the job demands they live in, then why charge anymore?"

Conclusion

Having listened to women, our three key recommendations on this topic are:

- The NLW should be the same for everyone, regardless of age.
- The NLW needs to be significantly higher and calculated to increase in line with the real cost of living.
- Zero-hours contracts should be banned to improve income stability.
- We need drastic pay increases in low-paid sectors where women predominate, such as care and hospitality, to alleviate the gender pay gap and value women for their skilled contributions.

The SWC is grateful for the opportunity to respond to the Low Pay Commission's consultation on the National Minimum Wage. As an organisation, we will continue to work with women from across Scotland to gather voices and experiences relating to this topic and its effects on women's equality.

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