

To be opened by the addressee only

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Consultation on “The Good Jobs” Employment Rights Bill

Rural Community Network (RCN) is a regional membership-based organisation supporting rural communities across Northern Ireland. RCN works with rural communities to address issues relating to poverty, inequality, community and good relations and strives to develop the capacity and skills of groups to articulate their voice at a policy influence level.

RCN has over 200 member groups across rural Northern Ireland. Its Board is also representative of its membership base. RCN’s aims are:

- to empower the voice of rural communities
- to champion excellence in rural community development practice
- to develop civic leadership in rural communities
- to actively work towards an equitable and peaceful society
- to promote the sustainable development of rural communities

RCN note your proactive approach in relation to the need to create Good Jobs and welcome the detailed nature of your consultation. As a regional organisation which represents the views of people living and working rurally, we found it difficult to fit into a specific category to answer your questionnaire booklet. To that end, we have taken the decision to provide this written response.

The Rural Needs Act (Northern Ireland) 2016ⁱ requires you, as Duty Holder, to give due regard to rural needs. As part of this consultation, we ask you to consider the following issues that have a serious impact on rural communities:

Rural Workers Premium

For people who live and work in rural communities, the cost of being in work is higher than may be the case for urban counterparts. A rural worker will usually have to travel further to get to work. With poor rural public transport options, including limited bus routes and/or limited bus times as well as limited access or no access to rail, Rural Workers are heavily reliant on vehicles to access a workplace. This is an added burden to many rurally located workers – not only the cost of buying and maintaining a vehicle but also the ongoing running costs of doing so, given the cost of fuel and running costs for a vehicle. This is evidenced by The Consumer Council, via their Transport Knowledge Hub.ⁱⁱ

Rural Families advise that if two parents are working, there is often a need for two vehicles in one household. We are aware that the vehicle of choice of many rural households, who are covering huge mileages in a year, are heavy diesel vehicles – often older generation cars. These vehicles are now subject to higher taxation costs due to emission issues adding to the expense in many low-income households who cannot afford to change cars. Rural workers state that they find themselves having to work the first hour to cover the travel costs of getting to work in the first place. This is what we refer to as a “Rural Workers Premium”

In addition to the transportation issues, rural workers requiring childcare to enable them to work have very few options due to the limited numbers of available registered childcare within rural communities. Families either rely on Grandparents or family members for support, and in turn, receive no financial assistance or, they have to travel to access registered childcare further afield. This additional travel to access childcare both before a worker commences work, and after finishing work, is adding a further financial burden on a worker. It also increases the length of a working day for both parents and young children. Due to the distances involved, the additional cost of childcare also reflects these longer hours to take account of commuting times for parents with many providers opening at eight and closing after six.

Rural Communities have expressed concern in relation to their mental wellbeing because of this and it is detrimental for work-life balance.

RCN ask you to please consider these implications for rural workers in relation to terms and conditions of employment. More flexible working times, and support for the additional hours of childcare should be considered to truly rural proof your policies.

Lack of Opportunity

In rural communities, there is limited investment by Government in foreign direct investment and the regional spread of new business development investment is unbalanced and so rural areas tend to lag behind.ⁱⁱⁱ With that issue comes fewer job opportunities as well as limited opportunity to progress. For example, in many rural regions the Agri-Food Industry has many large factories that require a lot of manual labour on minimum wage payments. These factories might hire 500 people on the production line however, only 5 of those people may progress to

middle management and only 1 may become a senior Manager, over a long period of time. We are concerned that those on minimum wage are those that we often see accessing advice and support from community and voluntary sector services as their incomes do not reflect their cost of living. The same can be said of many of the tourism and other service industry jobs in rural regions. We would like to see the whole sale introduction of a living wage for these workers.

In rural areas many of the regional college offer suits of lifelong learning opportunities but for many people access these courses requires challenges in relation to transport, childcare and affordability. We know education is a route out of poverty for many people and lifelong learning is an opportunity for those who want further opportunities. Accessing training and education to improve skills is also an issue.

RCN welcome a commitment to regional balance within this Bill both in terms of increasing job opportunities as well as investment in training and progression.

Apprenticeship Levy Funds

Population Statistics show an increasing older population with less and less younger people to take up work positions.^{iv} In addition to this, the Department admits a skills deficit and so it is disappointing to note no mention of the opportunity of apprenticeships within the Bill.

Rural Communities have significantly high numbers of employed and self-employed people in trade, agriculture and farming. These sectors rely on apprenticeships to train staff to work in their sectors and without continued investment and protection within this Bill, there is a concern amongst Rural Communities that they may be disadvantaged.

Zero Hours Contracts and Intermittent hours of employment/Seasonal work

In rural communities, we see a significant number of zero-hour contracts and/or intermittent hours of work. The justification for this tends to be that work is “weather dependent” or seasonal in nature. However, Rural Communities also see larger companies use it as a safety mechanism to ensure they have sufficient workers to cover shift patterns, but this gives no stability or guarantee of work to that worker. The impact this has on a worker financially is a serious concern and it creates a working environment that is less stable and reliable. The second rung of Maslow’s hierarchy of need is safety and security of employment. Zero hours contracts are not compatible with this and RCN would like to see them outlawed altogether.

Trussell Trust (2023) Hunger in Northern Ireland reports that insufficient income is the biggest driver of hunger in Northern Ireland and one in four people referred to food banks in the Trussell Trust network in Northern Ireland are in working households, with insecure work particularly correlated with food insecurity.^v

RCN welcome the Minister’s commitment to replace zero hours contracts with contracts that provide flexibility and protect workers’ rights, ensuring workers have contracts which reflect their normal work pattern with reasonable notice given for shift changes for example and that there is a guaranteed minimum number of working hours equivalent to the Administrative Earnings Threshold on Universal Credit.

RCN also suggest, in tandem, a review of the social security system, namely universal credit, in terms of rural proofing its “Real Time Information” system which runs on monthly assessment periods. It has proven through its implementation that it cannot financially or systematically facilitate rural seasonal workers or zero hour contract holders eg surplus earnings rules and claimant commitments which do not accept or facilitate a zero hours contract without making a person look for additional work. It is essential that exploitive use of said contracts no longer be permitted because the social security system is not protecting those workers financially when their contract does not do so either. At the very least, workers should be able to safely predict their working hours to ensure financial stability.

Tips

Seasonal workers working in tourism and hospitality are the most likely worker profile to receive tips. Rural Communities are often reliant on tourism to boost their economy. With low wage jobs and seasonal contracts presently a likely scenario in this sector, workers are reliant on tips to boost their wages. We are supportive of staff being able to keep all their tips as a result of this.

Real Living Wage

Rural Community Network supports the Real Living Wage Campaign which is aimed at tackling in-work poverty and ensuring that workers earn enough to participate fully in family and community life. ^{vi}

The campaign highlights how Northern Ireland has one of the highest rates of employees paid below the Living Wage in the UK, with 15.6% of jobs—equating to 190,000 workers—falling below this threshold. This has a knock on impact on their lives with further research highlighting that, in 2023 60% of low-paid workers had used a food bank, 39% had regularly skipped meals, and 39% had fallen behind on household bills. “Good Jobs” should never see a worker require to skip a meal or use a food bank.

Cardiff Business School also evidenced through this living wage campaign the knock-on impact of paying the Living Wage in that 94% of Living Wage employers noting business benefits from their accreditation. RCN welcome the Departments approach with this strategy that providing “Good Jobs” has over arching benefits to local businesses including rural businesses but we would like to see a commitment to the Real Living Wage within the Bill.

Cross Border or Frontier Workers

The Northern Ireland Legal Quarterly ^{vii}suggests that, as at 2018, there were between 18,000 and 29,000 people crossing the border to work between Northern Ireland and the Republic of Ireland. With Brexit complicating how this is done and very little by way of cross border support and advice on how to establish and/or navigate your employment rights as a Frontier or Cross Border worker, RCN would welcome a proposal to address this and ensure those workers also have “Good Jobs”.

Conclusion

Whilst we understand the Rural Needs Act (Northern Ireland) 2016 asks you to give due regard to the needs and complexities of rural working, RCN ask you to please go beyond “due regard”. 37% of the population of Northern Ireland live rurally and in areas of high deprivation, isolation and with limited access to services. “Good jobs” is essential to rural economic growth.

We thank you for allowing us the opportunity to feed into this important consultation.

ⁱ [Rural Needs Act \(Northern Ireland\) 2016 \(legislation.gov.uk\)](https://legislation.gov.uk)

ⁱⁱ [The cost of commuting highlighted in new Consumer Council data tool | Consumer Council](#)

ⁱⁱⁱ [Independent Review of Invest Northern Ireland \(economy-ni.gov.uk\)](https://economy-ni.gov.uk)

^{iv} <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-1-statistical-bulletin-demography-and-households.pdf>

^v Trussell Trust (2023) Hunger in Northern Ireland

^{vi} <https://livingwage.org.uk/>

^{vii} <https://nilq.qub.ac.uk/>