

2017

LOW PAY
COMMISSION

AN COIMISIÚN UM PÁ ÍSEAL

REPORT ON THE SUB-MINIMA
RATES OF THE NATIONAL
MINIMUM WAGE (Part 2)

December 2017

LPC NO. 7 (2017)

Acknowledgements

We are grateful to those who made submissions to the Commission and to the individuals and representative groups who met the Commission in Oral Hearings.

We are very grateful to Mr Brian Ring and his colleagues in the Central Statistics Office for their cooperation in developing very valuable new data sources.

We also wish to acknowledge the contribution of Dr Seamus McGuinness, Dr Helen Russell, Mr Bertrand Maître and Dr Paul Redmond and of the Economic and Social Research Institute in providing research essential to our work.

We are particularly grateful to the Secretary to the Commission, Máire Ní Chuiric, and to Paul Norris, for organising our business so efficiently and for their work in preparing our report.

REPORT OF THE LOW PAY COMMISSION ON THE SUB-MINIMA RATES OF THE NATIONAL MINIMUM WAGE (Part 2)

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Preface

Towards the end of 2015 the Commission was requested by the Minister to examine the sub-minima rates of the National Minimum Wage, and to report its findings and recommendations. Following a consultation process, the Commission submitted its report to the Minister in October 2016 (Report on the sub-minima rates of the national minimum wage (Part 1), LPC No.3 (2016)).

However, in its 2016 report the Low Pay Commission stopped short of making a recommendation on the appropriateness of the rates as the Commission was of the view that there was insufficient up-to-date data available, particularly in relation to the actual numbers on sub-minima rates of minimum wage, on which it could make an evidence based decision. The Commission, at the time, chose to delay making its recommendations until the results of a pilot question on the National Minimum Wage included within the CSO Quarterly National Household Survey (QNHS) were available.

Chapter 1 Current System

The current sub-minima system

The current system of sub-minima rates was introduced as part of the National Minimum Wage Act, 2000. The sub-minima rates relate to a number of exceptions from the National Minimum Wage which provide for a reduced rate to be paid in certain cases. The groups affected by the sub-minima rates are

- those under 18 years of age
- those over 18 who are in a first job (for up to two years), and
- those over 18 who are undergoing a prescribed course of study or training (known as trainee rates).

The current sub-minima rates are set out in Table 1 below.

Table 1 Current Rates of National Minimum Wage

		Effective from 1 Jan 2017	% of minimum wage
Adult Rate	Experienced adult worker	€9.25	100%
Age-based Rates	Aged under 18	€6.47	70%
	First year from date of first employment aged over 18	€7.40	80%
	Second year from date of first employment aged over 18	€8.32	90%
Trainee Rates: Employee aged over 18, in structured training during working hours	1st one third period	€6.94	75%
	2nd one third period	€7.40	80%
	3rd one third period	€8.32	90%

Source: *Low Pay Commission website*

The Sub-minima rates are tied to the adult National Minimum Wage as a fixed percentage. The sub-minima rates therefore change in line with any changes made to the standard National Minimum Wage.

These percentages are set down in the primary legislation – the National Minimum Wages Act, 2000 – and any changes to the fixed percentages would require amending primary legislation.

It should be noted that the so-called ‘trainee rates’ do not apply to statutory apprentices, who are an exempt category under the Act. Traineeships have to be in accordance with S.I. 99/2000 (see Appendix 1) which sets down certain criteria.

The ESRI noted in its 2016 report for the Commission “A study of sub-minimum wage rates for Young People” that the European Commission issued a Quality Framework for Traineeships (QFT) in 2014 that sought to ensure a common set of standards were adopted

for traineeships governing aspects such as accreditation, health and safety, a learning agreement, etc. The ESRI indicate that Ireland has yet to adopt any legislation, or introduce any regulations, to ensure that open market traineeships are compliant with the QFT. The ESRI notes that the lack of a regulatory framework in Ireland means traineeships are likely to be much more loosely defined relative to other EU countries that are QFT compliant.

The Commission is concerned that the lack of clear definitions around the training rates may leave them open to abuse. A particular concern is that the length of time permitted for the trainee rates (up to three years) may be excessive given the level of training required.

Chapter 2 Context and QNHS Data

The CSO published its first module on the QNHS results relating to the NMW, covering the period Quarter two 2016 to Quarter four 2016 at the end of April this year. These results provide the Commission with data as to the reported usage of the sub-minima rates of the NMW.

The specific question on the NMW piloted in the QNHS survey is as follows:

Quarterly National Household Survey – National Minimum Wage Pilot

Filter: If employed as an employee

The National Minimum Wage is €9.15 per hour. Are your gross hourly earnings excluding bonuses, overtime and allowances:

1. Less than €9.15 per hour
2. Exactly €9.15 per hour
3. More than €9.15 per hour

Filter: If answered option 1 above

Do you earn less than €9.15 per hour because you are on:

1. A special training rate
2. An age-related rate
3. A first job over 18 rate
4. Other reason

Filter: If answered option 4 above

Please specify the reason why your gross hourly earnings excluding bonuses, overtime and allowances, are less than €9.15 per hour.

Text field 200 characters

QNHS Results

The QNHS results confirmed what the Commission has already concluded in its 2016 report, in accordance with the evidence received through submissions from employer representative groups, employee representative groups and individual employers and employees. Evidence from the QNHS shows that the sub-minima rates are not in widespread use, and impact on a proportionately very small number of businesses and employees.

Overall, an average of just 1.5% of all employees (about 22,500) reported earning less than the 'adult rate' national minimum wage (then €9.15). The number varied from 27,600 in Q2 2016 to just 16,600 in Q4 2016. In the absence of full year data and year on year comparisons it is not yet possible to consider the effect of seasonal variation on these figures.

Those surveyed who indicated that they earned less than the NMW were asked to specify the reason. Table 2 below shows the reasons stated. On average, only 5,700 employees stated they were on special training rates, while a similar number, just 5,800 employees, reported that they were on age-related sub minima rate. In percentage terms this represents

just 0.3% of total employees in each of those categories. The number of employees in receipt of sub-minima rates due to being in either their first or second year of employment over the age of 18 was too small for an accurate estimate to be provided.

Table 2: Reason for earning less than the National Minimum Wage

Employees reporting earning less than National Minimum Wage by reason why	Average Q2 to Q4 16	Proportion
A special training rate	5,700	25.5%
An age-related rate	5,800	26.0%
A first job over 18 rate	*	*
Other reason	7,700	34.3%
Not stated	*	*
Total	22,500	100%

*Sample sizes too small to provide accurate figures

Source: Derived from CSO QNHS data

The largest number, just over a third of those earning less than the full rate of NMW, said this was for 'other reasons'. The CSO was not able to identify any pattern for the 'other reasons' from the information provided. It is possible that a proportion of these include people covered by the exemptions to the NMW (for example family members or apprentices) but some proportion could also reflect non-compliance with the Minimum Wage.

With no historic data available it is not possible to say whether there has been any change in the usage of sub-minima rates in recent years. With data available on a quarterly basis through QNHS it will be possible to measure this cohort into the future.

Policy changes – proposed expansion of apprenticeships and traineeships

In January 2017 the Minister for Education and Skills, Richard Bruton, TD, launched a new plan to expand apprenticeships and traineeships in Ireland, aimed at delivering 50,000 apprenticeship and traineeship registrations by 2020 (see tables setting out targets in Appendix 2, source: <https://www.education.ie/en/Publications/Policy-Reports/Action-Plan-Expand-Apprenticeship-Traineeship-in-Ireland-2016-2020.pdf>).

The Action Plan to expand Apprenticeship and Traineeship in Ireland 2016-2020 does not include information regarding proposed pay rates and structures, and it is not clear if all of the proposed apprenticeships fall into the category of statutory apprenticeships which are exempt from the NMW legislation.

The Commission sought the views of the Department of Education and Skills who did not respond with any concerns regarding NMW issues or the sub-minima rates in particular. It is not possible, therefore, for the Commission to assess if any changes to the current structure might impact on the proposed expansion of apprenticeships and traineeships.

Chapter 3 International Context

According to research carried out for the Low Pay Commission by the ESRI 26 out of 34 OECD countries have a statutory National Minimum Wage with just over half of these including sub minima rates for young people (full details of which are set out in the ESRI 2016 report “A study of Sub-Minimum Wage rates for Young People”). However the nature and value of the rates varies significantly across countries. Table 3 below gives a breakdown of sub minima systems and rates in selected countries.

Table 3: Sub Minima rates and systems in selected countries

Country	Age/Trainee rate	% of NMW or monetary value of rate
Belgium	Under 16	70%
	Under 17	76%
	Aged 19 with 6 Months seniority	102%
	Aged 20 with 12 months seniority	104%
France	Trainees working less than 2 months	No obligatory payment
	Other trainees	36.29% or greater
	Disabled workers in inclusion centres	55-100%
	Employee aged under 17 with 6 months experience	80%
	Employee aged 17 with 6 months experience in sector	90%
	Workers aged over 16 summer holidays	80%
Greece	Young people professionalism contracts	55-100%
	Workers aged 25 or less	€510.95 p.m. /87%*
Luxembourg	Employees aged 15 and 16	75%
	Employees aged 17	80%
Netherlands	Employees aged 15	30%
	Employees aged 16	34.5%
	Employees aged 17	39.5%
	Employees aged 18	45.5%
	Employees aged 19	52.5%
	Employees aged 20	61.5%
	Employees aged 21	72.5%
	Employees aged 22	85%
United Kingdom	Aged 21 to 24	£6.95/ 92.6%*
	Aged 18 to 20	£5.55/ 74%*
	Aged under 18 but above compulsory school age	£4.00/ 53.3%*
United States Federal NMW	Employees under 20 during the first 90 days of employment	\$4.25/ 58.6%*
	After 90 consecutive days of employment or when employee reaches 20 years of age	\$5.85/ 80.6%*

Source: Eurofound “Statutory Minimum Wages in the EU 2017” & United States Department of Labor

*In the UK, Greece and United States the percentage figure quoted is the current percentage of the National Living Wage, National Minimum Wage and the Federal Minimum wage rather than a fixed statutory entitlement.

As can be seen from table 3 the cut-off age for sub-minima rates varies from over 18 for Luxembourg to over 25 for Greece. As in the current Irish system a number of countries apply rates based on job experience. The federal minimum wage in the United States for instance increases to \$5.85 after an employee under 20 has worked more than 90 consecutive days in the one job. France and Belgium apply rates based on job experience and seniority. In Belgium in an effort to tackle youth unemployment a rate for employees aged under 21, which was eliminated in 2015, is due to be reintroduced. Under this system the minimum wage in Belgium decreases by six per cent per year below 21 years (6 per cent reduction for a 20 year old up to 30 per cent reduction for a 16 year old). However those below 21 receive a compensatory payment from the Government so as not to receive a lower wage. In Canada sub minima rates for youths have been eliminated in most States and only remain in Ontario and Nova Scotia. Similarly New Zealand removed sub-minima youth rates in 2008 replacing them with a minimum wage for new entrants (i.e. experience-based).

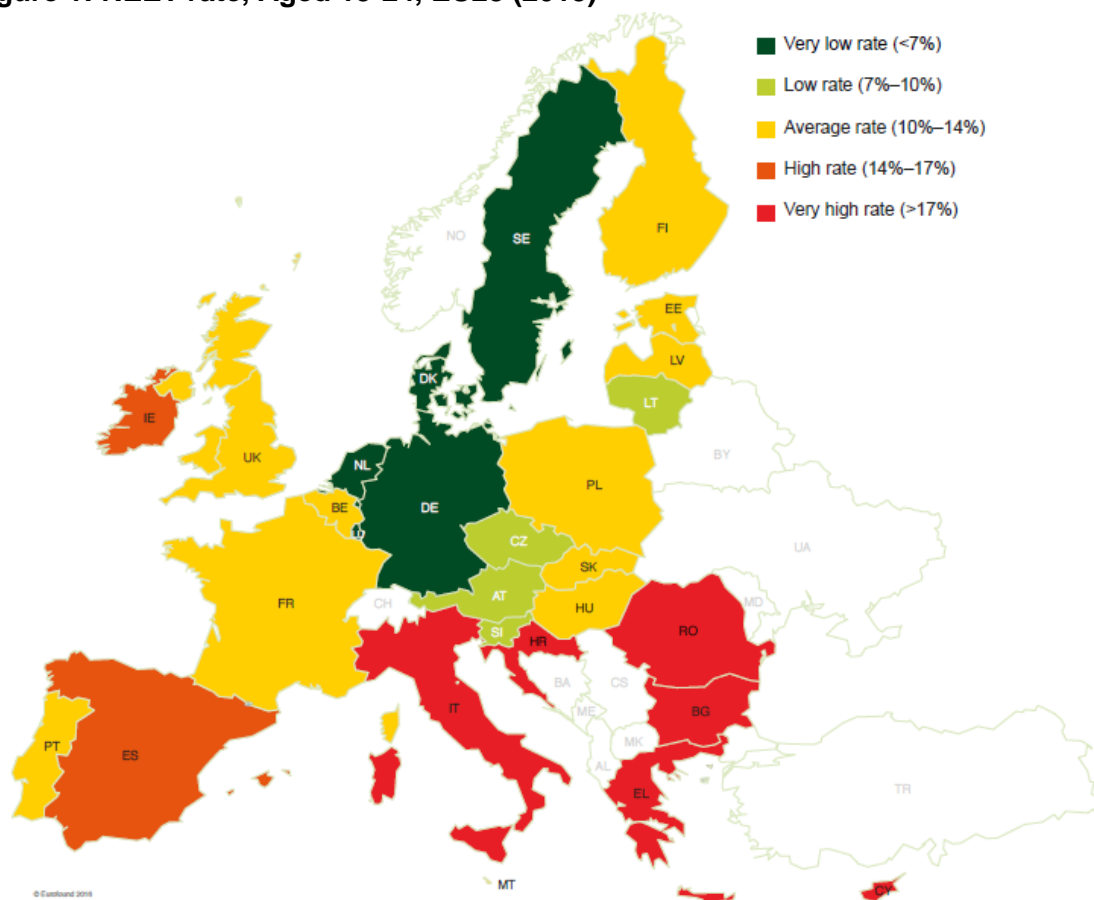
The main arguments put forward in defence of sub-minima rates for young people are that they act as an incentive for employers to hire young, inexperienced workers and thus enable them to gain access to the labour market while at the same time acknowledging that such employees are less experienced and therefore may require more training and initially be less productive. There is also the concern that if the minimum wage is set too high for young people, it will cause them to leave education prematurely in order to join the labour market. The primary argument against sub-minima rates is that they discriminate against younger workers by allowing employers to pay a rate below the National Minimum Wage and that all workers should receive equal pay for doing the same job.

In terms of International research certain studies have shown that the negative effects of increases in the minimum wage are slightly more pronounced for young workers but in general, as with the overall results, the effects of minimum wage policies on young people's employment or education decisions, whether positive or negative, have been found to be small and weak and sometimes insignificant.

NEETs (not in employment, education or training)

Following the economic crisis, European policymakers have put particular focus on NEETs, those young people who are not in employment, education or training, and the need to integrate or reintegrate them into the labour market. According to a recent study undertaken by Eurofound, NEETs face a greater risk of poor future employment outcomes and social exclusion. The same study found that based on data available for 2015 Ireland has a higher percentage of young people aged 15-24 (14.3% or 74,000) categorised as NEETs than the EU28 average (12%), the lowest percentage of NEETs being found in Germany and Denmark (6.3%) with the highest figure being in Italy (21.4%). Ireland's high proportion of NEETs is out of line with the majority of central and northern European countries and puts us in the same cluster as other countries who were severely impacted by the economic crisis, see figure 1 below.

Figure 1: NEET rate, Aged 15-24, EU28 (2015)



Source: Eurofound (2016), *Exploring the diversity of NEETs*

The proportion of each sub-category of Ireland's NEETs population are classified as re-entrants (21.4%), short term unemployed (25.3%), long term unemployed (26.2%), illness or disability (6.7%), Family responsibilities (12.1%), discouraged workers (3.5%) and other inactive (4.7%). (See appendix 3, note this data on sub categories relates to 2013 only).

Given Ireland's relatively high proportion of NEETs the Commission is cognisant of the need to ensure that any changes to the sub-minima rates of the National Minimum Wage do not negatively impact on the prospects of young people gaining access to the labour market.

Chapter 4 Options considered

Having considered all available data from the CSO QNHS pilot question on the NMW along with submissions received from employer and employee representative groups and studies carried out by the ESRI and Eurofound on sub-minima systems in other countries, the Commission examined a range of options as to what amendments, if any, were needed regarding the sub-minima rates of the National Minimum Wage.

In this chapter we will briefly review a number of these options and consider their merits and possible impacts.

Option 1: Keep current system in place

Justification:

- Evidence suggests that the rates are not in widespread use, which may suggest that there is little abuse of the system.
- The rates recognise that inexperienced employees are of less value to employers and require training and development.
- Sub-minima rates are in use amongst the majority of OECD countries which have a National Minimum Wage.
- Sub-minima rates ensure that the national minimum wage does not act as an incentive for young people to leave education and take up employment.

Impacts:

- Aspects of the sub-minima rates may be overly complicated and open to abuse.
- Training rates may be extended for longer than is required to learn skills.
- The system is unduly complicated regarding first and second year of employment over the age of 18.
- It can be argued that the sub-minima rates go against the principle of equal work for equal pay.

Option 2: Abolish Training Rates

Justification:

- All available evidence is that the training rates are not widely used.
- Training rates may be open to abuse as the length of time an employee spends on training rates may be considerably longer than the time required to learn the job.
- Ireland does not have a well-defined regulation of traineeships, which may mean they could be open to abuse.
- The apprenticeship programme provides a more structured method for the regulation and approval of training.

Impacts:

- The rates may still be in use within certain sectors.

Option 3: Abolish Youth Rates

Justification:

- Equal work would mean equal pay.
- The rates currently assume that young people do not have the same living costs as older colleagues; this may not always be the case.

Impacts:

- The rates would no longer offer any recognition of the difference between a young, inexperienced worker and a more experienced colleague; this could lead to employers no longer seeing a value in hiring young people and offering them work experience.
- Could potentially act as an incentive for young people to leave education and take up employment which would have a negative impact on their long term prospects.

Option 4: Simplify youth rates by setting 70, 80 and 90% rates as age-based i.e. under 18; 18 year olds; 19 year olds

Justifications

- This system would be administratively simpler as it would not require an employer to monitor an employee's work history and the rates would change based on date of birth.
- Would mean that the youth rates would only apply to those aged under 20 and would not affect older adults who had not previously held employment.
- The system would continue to offer some protection to younger workers while not acting as an incentive to leave education early.
- Age-based rates are in widespread use in many countries.

Impacts

- Employers would have an incentive to offer jobs to younger workers.
- Where younger workers were essentially doing the same job as an older worker, an element of discrimination would exist.

Option 5: Retain trainee rates, but subject to 'registration' of traineeships with, for example, the Enforcement Unit of the WRC

Justifications

- Training rates were historically included in Employment Regulation Orders and may still have relevance to some sectors.
- Providing a framework for 'registration' of traineeships would enhance the ability of the WRC to ensure that where the rates are used it is aware and can effectively monitor the usage.
- May reduce abuse where an employee remains on the rates beyond a reasonable and appropriate traineeship period.

Impacts:

- The necessity for 'registration' might be considered an unnecessary burden on employers.

Option 6: Abolish rates altogether

- Justifications and Impacts would be a combination of options 2 and 3.

Based on the data received from the QNHS question on the National Minimum Wage, research carried out by the ESRI on the Commission's behalf and submissions received as part of the Commission's consultation process in 2016, certain conclusions can be drawn regarding the current sub-minima rates of the National Minimum Wage.

Conclusions

- The number of employees on sub-minima rates is very low.
- A significant number of OECD countries use various forms of sub-minima rates, including age-based rates (the UK has recently extended the use of age-based rates, setting different rates up to age 25)
- There are a number of unsatisfactory aspects to the current operation of the trainee rates, including a lack of clear definitions.
- In comparison to other EU countries, Ireland has a high proportion of young people not in employment, education or training.

Recommendations

Having examined all available evidence and submissions, and considered a range of options the Commission makes the following recommendations:

1. **Abolish the training rates:**

- The Commission is of the view that an employee should not receive less than the statutory minimum wage unless as part of a proper apprenticeship programme already approved by the State. The Commission has heard evidence in submissions of the training rates being paid in order to reduce wage costs rather than as part of a structured training programme. The lack of clear definitions around training rates leaves them open to abuse. In light of these considerations and the low usage of the training rates the Commission is of the view that training rates should be abolished. The Commission would encourage sectors to register for state approved apprenticeship programmes if they feel that a period of structured training is required.

2. **Simplify the youth rates:**

- The Commission recommends that the current rate for employees under the age of 18 should be retained and considers that this rate acknowledges that under 18's have a statutory restriction on their working hours and conditions.
- With regard to the current rates for employees in their first year of employment over the age of 18 (80%) and employees in their second year of employment over the age of 18 (90%), the Commission recommends that this

be changed to an age based system. Under this system a rate of 80% of the NMW should be payable for those aged 18 and a rate of 90% of the NMW should be payable upon the employee turning 19.

- Such a system would be administratively simpler from an employer's perspective as it does not require an employer to establish the previous work history of an employee, while also ensuring that young people are able to gain access to the labour market.

Under the Commission's recommendations the permitted sub-minima rates of the National Minimum Wage would be as follows:

- Employees under 18 would receive a minimum of 70% of the NMW
- Employees aged 18 would receive a minimum of 80% of the NMW
- Employees aged 19 would receive a minimum of 90% of the NMW
- Employees aged 20 and over would receive the full NMW

APPENDICES

1. **S.I. 99/2000 Prescribed courses of Study or Training**
2. **Tables extracted from Department of Education and Skills publication 'Action Plan to Expand Apprenticeship and Traineeship in Ireland 2016-2020'**
3. **NEETs by categorisation**

S.I. No. 99/2000 - National Minimum Wage Act, 2000 (Prescribed Courses of Study Or Training) Regulations, 2000

I, Mary Harney, Minister for Enterprise, Trade and Employment, in exercise of the powers conferred on me by [section 3](#) (1) of the [National Minimum Wage Act, 2000](#) (No. 5 of 2000), and by reference to section 16(1) of that Act, make the following regulations:

1. These regulations may be cited as the National Minimum Wage Act, 2000 (Prescribed Courses of Study or Training) Regulations, 2000.

2. In these regulations, in relation to a course of study or training -

“approach” means the training methods and techniques, and how the learning will be delivered;

“assessment and certification procedure” means how the course is to be assessed for certification purposes and identifies the certifying body or the arrangements concerning written confirmation of the employee's completion of the course identifying the level of employee attainment against the objectives, which must include provision for the employee's signature;

“directed study or training” means planned and structured study or training which is insulated from immediate operational job pressures and can be delivered inside or outside the workplace;

“duration” means the total time allocated to the course in terms of hours per week and number of weeks; the duration of all main elements including workplace training and directed training, as appropriate, and the assessment time should be clearly shown;

“objectives” means the expected performance to be demonstrated by the employee at the end of the overall period of the course; that is, what the employee will be able to do on completion of the course in terms of knowledge, practical and personal skills to be demonstrated;

“outline plan” means the content of each module of the course which should state the titles, sequence of delivery, and time (in days/weeks/months) of each module;

“purpose” includes the rationale for the course, describing what it is expected to achieve and the expected outcomes of the training in terms of trainee opportunities;

“record system” means the types of records to be kept for the purposes of-

- (a) planning and implementing the study or training;
- (b) showing progress against the training objective;
- (c) administration;

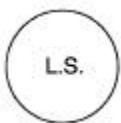
“title” means the name of the course;

“workplace training” means planned and structured study or training carried out under normal operational job pressures.

Prescribed courses of study or training 3. A course of study or training that satisfies the following criteria is a prescribed course of study or training for the purposes of [section 16](#) of the [National Minimum Wage Act, 2000](#) :

- (1) The employee's participation in the course is directed or approved by the employer.
- (2) The duration of the course is for a minimum period of 3 calendar months.
- (3) Subject to paragraph (4), the course takes place during the normal working hours of the employee.
- (4) The course involves at least 10% of directed study or training, which may be within or outside of normal working hours.
- (5) Any fees concerned with the employee's participation in the course directed by the employer, are paid by the employer.
- (6) The course –
 - (a) enables the acquisition of skills and/or knowledge expected to enhance the work performance of the employee at the end of the course,
 - (b) includes directed study or training,
 - (c) an outline plan of duration and approach,
 - (d) the record system to apply,
 - (e) the assessment and certification procedure,
 - (f) advice by the employer of any facilities, including any time-off, to be given to the employee during the period of the employee's participation in the course to enable the employee to successfully complete the course, and any changes to the employee's working arrangements during the period of the employee's participation in the course.

Given under my Official Seal,
this 4th day of April, 2000.



Mary Harney
Minister for
Enterprise, Trade
and Employment.

Explanatory Note

(This note is not part of the Instrument and does not purport to be a legal interpretation).

This Order prescribes the criteria a course of study or training must satisfy in order that an employee undergoing such a course and who is aged 18 or over, shall be paid in accordance with section 16(1) of the [National Minimum Wage Act, 2000](#) .

Tables extracted from Department of Education and Skills publication 'Action Plan to Expand Apprenticeship and Traineeship in Ireland 2016-2020'

Table 4: Target apprentice registrations and cumulative number of apprenticeship programmes by year

Craft-based apprenticeships	2016	2017	2018	2019	2020
Number of apprenticeship programmes	27	27	27	27	27
Forecast new registrations per annum*	3,390	4,147	4,697	5,087	5,587
New apprenticeships	2016	2017	2018	2019	2020
Planned number of apprenticeship programmes (cumulative)	2	15	25	35	40
Planned new registrations per annum	82	800	1,500	2,297	3,413
Total target apprentice registrations p.a.	3,472	4,947	6,197	7,384	9,000

= 31,000 cumulative new apprenticeship registrations by 2020

*Forecast (as of October 2016) of new registrations on craft-based apprenticeships provided by Skills and Labour Market Research Unit (SLMRU) and Apprenticeship Services Unit

Table 5: Target trainee enrollments and cumulative number of traineeship programmes by year

Existing traineeships	2016	2017	2018	2019	2020
Number of 'live' traineeship programmes*	24	24	24	24	24
Target new enrolments per annum	2,400**	2,400	3,000	3,500	3,500
New/relaunched traineeships	2016	2017	2018	2019	2020
Number of traineeship programmes	2	4	10	20	30
Planned new enrolments per annum	100	200	900	1,500	1,500
Total target trainee enrolments p.a.	2,500	2,600	3,900	5,000	5,000

=19,000 cumulative new traineeship registrations by 2020

*Source: FARR database, SOLAS as of July 2016

**2,400 trainees in 2016 is an estimate by Education and Training Boards of participation numbers as of July 2016.

NEETs by categorisation¹

Re-entrants: This category captures those young people who will soon re-enter employment, education or training and will soon begin or resume accumulation of human capital through formal channels. They are people who have already been hired or enrolled in education or training.

Short-term unemployed: This category is composed of all young people who are unemployed, seeking work and available to start within two weeks, and have been unemployed for less than a year. A short period of unemployment during the transition from school to work can be considered normal, and the level of vulnerability among people in this category can be expected to be moderate.

Long-term unemployed: This category is composed of all young people who are unemployed, seeking work and available to start within two weeks, and have been unemployed for more than a year. People in this category are at high risk of disengagement and social exclusion. Long-term disengagement damages young people's employability, their human capital and their future employment outcomes; in some cases, the damage will last the rest of their lives.

Unavailable due to illness or disability: This category includes all young people who are not seeking employment or are not available to start a job within two weeks due to illness or disability. This group includes those who need more social support because illness or disability means they cannot do paid work.

Unavailable due to family responsibilities: This group includes those who are not seeking work or are not available to start a new job because they are caring for children or incapacitated adults, or have other less specific family responsibilities. Young people in this group are a mix of the vulnerable and non-vulnerable; some are not able to participate in the labour market because they cannot afford to pay for care for their child or adult family member, while others voluntarily withdraw from the labour market or education to take up family responsibilities.

Discouraged workers: This group captures all young people who have stopped looking for work because they believe that there are no job opportunities for them. They are mostly vulnerable young people at high risk of social exclusion who are very likely to experience poor employment outcomes over the course of their working lives and are at high risk of lifelong disengagement.

Other inactive: This group contains all NEETs whose reasons for being NEET do not fall into any of the previous six categories. This group is a statistical residual category, and it is made up of those who did not specify any reason for their NEET status. It is likely to be an extremely heterogeneous mix that includes people at all extremes of the spectrum of vulnerability: the most vulnerable, the hard-to-reach, those at risk of being deeply alienated, the most privileged, and those who are holding out for a specific opportunity or who are following alternative paths, such as careers in the arts, that have little formal presence in the labour market or education.

¹ Taken from Eurofound (2016), *Exploring the diversity of NEETs*

December 2017

LPC NO. 7 (2017)