

THE NATIONAL MINIMUM WAGE AND 'THERAPEUTIC' WORK

INFORMATION NOTE

This note has been prepared by the Department of Trade and Industry, with the assistance of the Department for Education and Employment, the Department of Social Security and the Department of Health.

THE FOLLOWING ORGANISATIONS WERE CONSULTED DURING THE PREPARATION OF THIS DOCUMENT:

CONNECT SUPPORT AND EMPLOYMENT
DUNDEE CITY COUNCIL (EMPLOYMENT DISABILITY UNIT)
GLOUCESTERSHIRE COUNTY COUNCIL, SOCIAL SERVICES
LEICESTERSHIRE EMPLOYMENT ACTION TODAY
MAKING SPACE
MENCAP
NATIONAL ASSOCIATION FOR SUPPORTED EMPLOYMENT
NATIONAL LEAGUE FOR THE BLIND AND DISABLED
NATIONAL SCHIZOPHRENIA FELLOWSHIP SCOTLAND
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SCOTTISH UNION OF SUPPORTED EMPLOYMENT
SHAW TRUST LTD
TUC
WELSH INITIATIVE FOR SUPPORTED EMPLOYMENT

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It is important to note that the information and examples contained in this note are intended to provide general guidance.

This note should NOT be regarded or relied upon as a complete and authoritative statement of the law.

Summary of main points

- The minimum wage legislation only applies to “workers”. So the key question is whether or not any particular person is a “worker”. If not, then the minimum wage does not apply. “Worker” has a legal definition and depends on the existence of a contract.
- Usually, workers have written contracts of employment so it is a straightforward matter to establish their status. But the “worker” definition says that people can count as workers if they have an oral contract or an implied contract. This leads to some ‘grey areas’ where status may be disputed.
- One such grey area is the issue of people doing work (or work-like activities) for therapeutic reasons. This note explores some possible scenarios where this is an issue.
- An individual’s productivity or ability is irrelevant in determining whether a contract exists
- The Government can only give general guidance and clarification of the law. Individual circumstances and arrangements vary and the existence or otherwise of a contract will depend on the facts in a particular case.
- In cases of doubt, independent legal advice should be sought.

Section 1 - Introduction

Aim of the guidance note

This note is intended to help individuals and organisations understand how the national minimum wage applies in relation to what is often known as ‘therapeutic work’. The note has been produced in response to the findings in the second report of the Low Pay Commission (the independent statutory body which advises the Government on minimum wage issues). The Low Pay Commission found that:

“... ..there is confusion over which activities should be defined as work for the purposes of the national minimum wage. Some of the work designated ‘therapeutic’ for benefits purposes is in fact similar to that undertaken in open or supported employment. People undertaking this work are entitled to the national minimum wage. The basic principle, consistent with the provisions of the legislation, must be that an individual should be considered a ‘worker’ unless the employer can demonstrate otherwise.” (Second Report p 67)¹.

The Low Pay Commission acknowledged that the DTI had had discussions with organisations representing people with disabilities and had issued some guidance on the legal principles for establishing employment status², but also noted that they had received other evidence which showed that confusion still existed, and went on to recommend that

“the relevant departments and agencies work together to produce, and widely disseminate, clear guidance on what constitutes worker status for individuals undertaking therapeutic activity to ensure that they are not adversely affected by confusion about the legal position.” (Second Report p 69)

The relevant Government departments, in response to this recommendation, have been in discussion with a large number of disability organisations. This note represents the outcome of those discussions and has been prepared with the help of those organisations listed inside the front cover.

¹ *The National Minimum Wage: The Story So Far* – The Second Report of the Low Pay Commission, February 2000, available from The Stationery Office

² See “Existing advice on the worker definition”, page 4 below

Section 2 – Legal Position

Who is entitled to the national minimum wage?

A person's right to be paid at least the national minimum wage by his³ employer is created in the primary legislation known as the "National Minimum Wage Act 1998". Section 1 of that legislation says that someone qualifies for the national minimum wage if he is a worker who works in the UK. This is the starting point of the legal entitlement to the minimum wage but the full picture can only be understood by reference to the rest of the Act and the subordinate legislation known as "The National Minimum Wage Regulations 1999" and "The National Minimum Wage Regulations 1999 (Amendment) Regulations 2000". This note does not attempt to provide a full analysis of those pieces of legislation. Rather, it explains which minimum wage provisions are relevant to the issues of so-called therapeutic work and explores some difficult areas.

It is important to note that there is nothing in the minimum wage legislation which makes any reference to a worker's productivity, ability or effectiveness. There is no distinction between the non-disabled and disabled, and there is no reference to 'therapeutic work' or 'therapeutic workers' anywhere in the legislation. It follows that the criteria for determining whether a person with a disability is or is not entitled to the national minimum wage will rest on precisely the same criterion as any other person; namely – is he a worker?

The definition of a worker

Section 54 of the National Minimum Wage Act 1999 defines a worker as someone who is an employee (that is, someone who works under a contract of employment, including a contract of apprenticeship) or anyone else who works under some form of personal contract for somebody else, and is not genuinely self-employed.

This definition of 'worker' therefore includes the traditional definition of 'employee' but goes wider than that. This was a deliberate choice, taken because the Government wanted to ensure that people such as agency workers, casual workers and workers on short term contracts would still be entitled to the minimum wage even if their contracts were not contracts of employment.

³ For reasons of space and readability, this note uses *he* to refer to both genders throughout

The definition is further extended by Sections 34 and 35 of the Act, which say that certain types of agency worker and homeworker will count as workers even if they do not have workers' contracts. In the case of agency workers (Section 34), the law says that anyone who is supplied by an agent to do work for another person will count as a worker even if they do not work under a contract, as long as they are not genuinely self employed. Because this is potentially quite a wide-reaching provision, the Government took the opportunity in July 2000 to explain the sort of situations it was intended to apply to.

"It will help if I clarify for the House the purpose of Section 34 of the National Minimum Wage Act 1998, which entitles agency workers to the minimum wage. The reason we needed the section was because some people who are supplied by agencies to do work for others sometimes do so under peculiar and often deliberately obscure arrangements such that they would not have counted as workers under the standard definition in Section 54 of the Act. Section 34 was never intended to apply to those who are supplied by a training organisation to business for the purpose of receiving training rather than performing work and should not be taken to do so." **Lord Sainsbury of Turville**, 14 July 2000⁴

How to recognise a worker's contract

The Act specifically states that a contract can be express (either oral or written) or implied. It is important to emphasise, therefore, that a worker may have a contract without having it in writing. The difficulty of establishing the existence or otherwise of verbal and implied contracts is long-standing. It is an inevitable result of the many and varied forms of working arrangements that exist in the UK's lightly regulated and flexible labour market. Much of the case law in the field of employment law and indeed contract law more generally has centred on this difficult question. While the problem is therefore by no means unique to the national minimum wage, many of the organisations concerned about the status of therapeutic work may not have come across the issue before. This is largely because the right to be paid at least the national minimum wage is a right which is more likely to impact directly on their arrangements (and one which workers themselves are more likely to enquire about) than some of the other employment rights which may already apply but tend to have an impact only occasionally (such as the right not to be sacked, and the right not to face discrimination on the basis of sex or race).

The burden of proof

The National Minimum Wage law is unique in one way, in that it places

⁴ ref Hansard: *National Minimum Wage Regulations 1999 (Amendment) Regulations 2000 debate*, House of Lords, 14 July 2000, col. 524.

the burden of proof on the employer to prove that the minimum wage has been paid, rather than placing the burden on the worker to prove that it has not. Similarly, in the case of establishing worker status, the assumption will be that the person is a worker, and the burden is on the alleged employer to show that he is not. This reversal applies in civil cases only, and is intended to ensure that an employer cannot avoid his obligation to pay the minimum wage by being non-co-operative or pleading an absence of documentation.

Existing advice on the worker definition

The '**Detailed Guide to the National Minimum Wage**' was issued in early 1999 (call **0845 6000 678** for a copy, updated to include the changes brought in on 1 October 2000). The original version explained the application and coverage of the minimum wage, but did not deal specifically with the issue of therapeutic work. The Department of Trade and Industry then produced a short piece of guidance on the difficulty of establishing whether or not a worker's contract exists where informal arrangements are in place. This was particularly aimed at organisations involved in providing therapeutic activity. The guidance points out that there will always be a difficulty in establishing the employment position of people who are not in the general labour market, or who are being introduced gradually to it. Those with access to the internet can also refer to the Government's new website known as "**TIGER**" (Tailored Interactive Guidance on Employment Rights) at www.tiger.gov.uk which provides decision trees and ready-reckoners which can be tailored to an individual's particular circumstances.

The short note which the Government produced last year explains that where there is uncertainty about whether or not a worker's contract exists, enforcement officers, tribunals and courts will take into account a number of factors that will indicate whether there is a contractual relationship. These include:

- whether the intention of both parties is to create a relationship of employer and worker, with the associated mutual obligations, rather than simply to enable the individual to acquire certain skills, experience, or therapy;
- whether the individual is rewarded (with money or some other form of consideration), and whether the payment is a 'wage' related to work actually done and which the individual has a right to receive, rather than the payment being an *ex gratia* 'allowance', for example;

- whether the individual is required to work at certain times, for a set number of hours, or to produce an agreed amount of work, rather than being free to come and go as he chooses.

In the context of so-called ‘therapeutic work’, the intention of both parties and the ‘wage’ related to work actually done may be crucial factors.

An important point which is emphasised in this note and in all other employment law literature is that a tribunal will decide every case on its own merits. This means that it is ultimately in the hands of the organisation and individuals concerned whether they create legally binding contracts between them, by entering into an express contract or behaving in a way that results in a contract being implied. If in doubt, organisations are advised to take their own legal advice.

The Government has now built on that original short piece of guidance. The document which you are now reading was written with help from a number of disability organisations, and supersedes the short note. It is important to appreciate, however, that the law itself has not changed in any relevant regard since the earlier guidance. The Government’s advice remains the same. Our aim is to dispel, through the use of examples and questions and answers, some of the doubt and uncertainty which the Low Pay Commission identified in its report.

Section 3 - Therapeutic work

Why is ‘therapeutic’ work a particular problem?

‘Therapeutic work’ is not a legal term. It is used to describe a number of arrangements whereby people who have problems functioning in the normal labour market are nonetheless given the opportunity to undertake some form of work-like activity, for which they may receive payment. (They are often in receipt of state benefits as well – see section 4). It follows from the legal position described in section 2 that if a disabled person does this activity under an arrangement that is an explicit or implied worker’s contract, then they must be paid the national minimum wage for that work⁵.

The situation which causes the most difficulty is where an informal arrangement is in place, which may sometimes suit both the disabled person and the organisation for other reasons, but which involves payments of below the minimum wage. In such cases there may or may not be an implied contract in place which would make the disabled person a worker entitled to the minimum wage. If such a contract exists, payment of a wage below the minimum rate would be unlawful. The following scenarios have been supplied by organisations involved in therapeutic work and demonstrate where such ‘grey areas’ might be found.

It is important to appreciate that all decisions on worker status and applicability of the national minimum wage need to be taken on a case-by-case basis, depending on the particular facts in that case. It is not therefore feasible, nor would it be helpful, to give definitive answers to these scenarios. But the brief analysis which follows each example may be helpful:

⁵ Except, of course, where other exemptions apply, such as the one for workers under the age of 18.

Examples of therapeutic activity where worker status is unclear

Scenario 1

An individual has a serious illness and his productive capacity is almost zero. He is provided with some work to do by a charity but because of his productivity, it is clear to all parties that the work is for purely therapeutic and rehabilitative purposes. He receives state benefits but no payment from the charity.

Analysis

The individual is almost certainly not a 'worker'. The crucial factors are whether the individual is under a contractual obligation to work, and whether the charity is under a contractual obligation to pay him for his work. Neither situation is likely in cases of purely therapeutic activity such as this.

Scenario 2

An individual works in a specially created therapeutic placement but cannot undertake the full range of duties of the post. Others whom he works alongside are expected to work more than ten hours a week but such hours would be excessive for this worker. If he worked these hours and were paid the minimum wage he would lose housing benefit or council tax reduction.

Analysis

The individual may well be a worker, but in such situations the precise facts will vary from case to case and it is the facts that will determine the matter one way or the other. If he is working under a contract as a 'worker', then he has the same right to the minimum wage as any of his fellow workers. It is a matter for him (or his adviser) and the employer to agree suitable hours. The read-across to benefit entitlements does not affect the legal position although the Government is certainly aware of the interrelationship between pay and social security benefits, and is committed to ensuring that individuals have financial incentives to work rather than being wholly dependent on benefit payments. This is a fundamental reason for establishing a national minimum wage in the first place.

Where there is an issue about the interaction between pay and benefits, it is always advisable to talk to the local office of the Benefits Agency.

Scenario 3

Individuals 'work' in a Social Service workshop undertaking contract 'work' for a few hours each day, between one and five days a week. Clients are technically free to come and go as they please and receive up to £5 a week depending on work carried out.

Analysis

Again the answer will depend on precisely what arrangement is in place. But the fact that these individuals are free to come and go as they please must be weighed against the fact that they are paid for work done, and that this amount varies according to the amount of work (ie. it looks more like a wage than an allowance or other ex gratia payment).

Scenario 4

An individual has undertaken 'work experience' for two years 'working' a few hours per week. To be able to cope with the work environment and achieve an acceptable level of productivity, he needs a supporter to be present the whole time. If the minimum wage were to be required, the work placement would be terminated.

Analysis

It is certainly possible for someone to be on a work placement or doing work experience without having a contract which makes him a worker in the eyes of the law. That may be the case in this situation. Alternatively, the fact that the scenario identifies an 'acceptable level of productivity' might indicate the existence of a contractual relationship with rights and obligations on both sides. The question of whether any payment is made is likely to be crucial. If the individual is a worker, then termination of the contract because of the worker's entitlement to the minimum wage would fall foul of section 23 of the NMW Act (the right not to suffer a detriment).

Scenario 5

A client carries out a 10 week 'work experience' for two days a week and is not paid since the company regards it as a work experience placement not employment.

Analysis

This is similar to scenario 4. The fact that the individual is not being paid makes it more probable that no worker's contract exists.

Scenario 6

A client is a volunteer at a local private company and not paid.

Scenario 7

Clients attend a day care facility, which takes the form of a workshop environment, for three or four days a week. There is a £1 per day charge for transport but no payment is made to the clients. The income of the day care centre pays the directors' salaries and the Social Services Department contributes a grant.

Analysis

The individuals in these two scenarios would almost certainly be outside the scope of the Act as they do not get paid for their work, meaning that it is highly unlikely that a worker's contract exists. The only question to pursue would be whether any other form of consideration (other than monetary payment) is received which could imply a contractual relationship.

Scenario 8

A client undertakes four hours voluntary work, in addition to paid work in the organisation. He works the additional hours voluntarily and could go home if he chose.

Analysis

This is less clear cut than scenarios 6 and 7. The individual does paid work and unpaid ('voluntary') work for the same organisation. A tribunal would need to determine whether the extra hours were genuinely outside the contract, or whether there was some expectation of this extra work from the employer and that this was simply a device to minimise the hours to count when calculating the minimum wage. A tribunal might also want to know if the type of work that the individual carries out differs in any way between the two circumstances.

Scenario 9

A company operates as part of the Social Services day care provision. The client works in the company up to three days a week. Clients are paid a token monthly amount as pocket money.

Analysis

In this scenario there is a regular payment but it is very small. It is unlikely to be viewed by the client or company as a 'wage' in the normally understood meaning of the word. But 'pocket money' or 'token payments' in this context are meaningless terms. The question for a tribunal would be whether the work was being done under contract, and the issue of whether the payment was made in return for the work done would be seen as crucial. The fundamental point is that **either** an individual is not paid at all for the work he does and there is no contractual obligation on that individual to do the work, **or** he is working under a worker's contract and should get the minimum wage. The payment of small amounts in return for work, often described as 'pocket money', 'regular honoraria', 'top-ups' and so on, will always carry an element of risk since it may be taken as evidence that an implied worker's contract has been created (making the worker entitled to the minimum wage among other things). This risk may be lessened if the company can make clear, and be able to prove, that there was no intention to enter into a contract, that no-one is under any obligation to attend and that no-one has any right to be paid.

Section 4 – The Benefits System

Background

Various benefits, such as Incapacity Benefit, Severe Disablement Allowance and Income Support, provide help for people who reach the threshold of incapacity at which entitlement to benefits does not require availability for work

It is recognised, however, that allowing some work can help improve a person's medical condition and in some cases help the chances of a return to the labour market. There are a number of types of work that are permitted including work that is generally known as therapeutic work.

The benefit rules for 'therapeutic work'

The rules allow benefit to continue if a claimant undertakes work on the advice of his doctor and -

- (i) it is confirmed that the work, which must be done for less than 16 hours a week on average, will help to improve, or prevent or delay deterioration in, the condition which causes the person's incapacity for work;

or

- (ii) it is part of a treatment programme done under medical supervision while the claimant is an in-patient or regularly attending as an out-patient of a hospital or similar institution;

or

- (iii) it is done while the claimant is attending an institution, which provides sheltered work for people with disabilities

In all cases earnings, after the deduction of allowable expenses, must not exceed £59.50 a week. This earnings limit is known as the **therapeutic earnings limit**. It was increased from £58.50 to £59.50 a week from 2 October to take account of the increase in the national minimum wage.

Although earnings below the £59.50 limit do not affect the payment of Incapacity Benefit and Severe Disablement Allowance, the payable amount of income-related benefits, (Income Support, JSA (IB), Housing Benefit and Council Tax Benefit), is affected if earnings exceed the appropriate earnings disregard – usually £15 a week for the long-term sick and disabled. This earnings disregard will increase to £20 from April 2001, as announced in the budget.

General guidance on therapeutic work can be found in DSS leaflets WK1 and WK4 which can be obtained from local offices of the Benefits Agency. Claimants considering therapeutic work are advised to discuss the matter with the Benefits Agency before starting work.

Section 5 – Types of Support Available

Social Services Departments and some voluntary sector organisations provide 'supported employment', and a worker on such a scheme is covered by the minimum wage legislation in the same way as any other worker. The Employment Service is responsible for delivering the Government's "**Supported Employment Programme**". It is a requirement of this Programme that those placed on it be paid at least the national minimum wage.

The Supported Employment Programme provides job support to over 22,000 people with disabilities who face complex barriers to getting or keeping a job, but who can work effectively with the right support. It provides opportunities for disabled people to work in a supportive environment and where possible to progress in mainstream employment. Referrals to the Supported Employment Programme are made through the Disability Employment Advisers (DEAs), who are usually based in Jobcentres.

The programme is managed by the Employment Service, which contracts with 200 local authorities and voluntary organisations and Remploy Ltd. Supported employees work in mainstream employment with a range of organisations, including small outlets, national companies and the public sector. Some are employed in supported factories and businesses run as part of the programme. Anyone wishing to take up support under the programme should first consult their Employment Service Disability Employment Adviser.

Ministers announced a radical modernisation of the Supported Employment Programme on 8 December 2000. The Programme will be refocused and will be known as **WORKSTEP** from April 2001. Key changes will include new eligibility criteria and priority for people on incapacity benefits, targets for progression to mainstream employment, funding arrangements that support progression and quality standards for the Programme's delivery. The aim is to move to a more flexible model of delivery that moves away from the typical wage subsidy model of previous years and includes a greater focus on individual development, use of job coaches/ job trainers, individual advice and support, mentoring and support to employers. All those placed on the Programme will have contracts of employment and receive at least the national minimum wage.

In addition to the SEP, DEAs can advise on the range of other programmes for people with disabilities including:

- Job Introduction Scheme - allows client to try out a job for a trial period, while the Employment Service helps the employer with the wages;
- Access to Work - helps to tackle some of the practical obstacles facing disabled people at work ie. providing a support worker, special equipment help towards the cost of getting to work if the client cannot use public transport;
- New Deal (mainstream) – disabled people in receipt of JSA are eligible for all mainstream New Deal programmes i.e New Deal for Young People, New Deal 25+, New Deal for Lone Parents, New Deal for Partners of Unemployed people as appropriate (often without the eligibility criteria afforded to non-disabled people).
- New Deal for Disabled People (NDDP) has a different client group. It is aimed wholly at people with a long term illness or disability who are in receipt of Incapacity Benefits and, consequently, participation is voluntary. There are 2 strands. Firstly, a **Personal Adviser Service** piloted in 12 areas of the UK to help and the client and occasionally therapeutic earnings or voluntary work are part of that plan. Secondly, a number of **Innovative Schemes** are exploring a range of ways to help disabled people into work usually covering the full range of jobs and disabilities but sometimes within specific disability groups and/or job roles. NDDP has been running in pilot form and is to be extended nationally in 2001.

Welfare to Work Joint Investment Plans (JIPs) are also relevant in this context. Their function is to bring together into a strategic partnership the range of statutory and voluntary agencies that support disabled people who are working or who wish to enter employment. The development of these plans, (initial versions of which are to be in place from April 2001) is being led by local authorities with key involvement from the Employment Service and Benefits Agency. The aim is that the JIPs will map existing support services and resources currently directed towards supporting disabled people in employment and then plan and reprioritise them in the way that best meets local need.

Section 6 – Other points regarding minimum wage rules

Types of work for minimum wage purposes

Once organisations come to the view that a particular individual does count as a worker for national minimum wage purposes, then they will need to identify how to calculate the hourly rate. In the Regulations, there are four types of work: **time work**; **salaried-hours work**; **output work**; and **unmeasured work**. The rules and calculation of hours differ for each. While the calculation is relatively straightforward in most cases, especially where there is a simple wage paid for hours worked, it can be more complicated if payment is measured some other way, such as by piece-rate or commission (output work) rather than by hours (time work). The type of work depends on the way in which the worker is paid for the work that he does, not on what sort of job he has.

For **output work** and for **unmeasured work** there are special provisions in the rules allowing an employer and worker to come to an agreement over a sensible estimate of the hours to be spent on the work. Provided this estimate can be shown to be fair and realistic, then it means that the minimum wage is only required to be paid for the hours in the agreement, rather than those actually worked. This may be of particular relevance in some situations involving therapeutic work, but it is a good idea to refer to the Detailed Guide or the National Minimum Wage Regulations themselves for more information before any such agreements are put in place. The Minimum Wage Helpline number for enquiries and to order the Guide is **0845 6000 678**.

Voluntary workers

People who do work which is purely voluntary (that is, with no expectation of a reward of any kind, monetary or otherwise) are not workers, and so have no entitlement to the national minimum wage. However, some people who consider themselves ‘volunteers’ may in fact be working under implied or explicit workers’ contracts because of the nature of their work and the rewards they receive for it. Section 44 exempts some of these ‘voluntary workers’ from the Act, provided that the only reward they receive is actual or reasonably estimated expenses, or benefits (not cash) relating to subsistence, and providing that the work they do is for a charity, voluntary organisation or statutory body. Again, the Act itself and the Detailed Guide should be referred to for more information. Readers may also wish to be know that the NCVO and the National Centre for Volunteering have produced special guidance for the

voluntary sector, which was produced with the assistance of the DTI.
The NCVO can be contacted on 020 7713 6161.

Section 7 – Frequently asked questions

Q: Why can't the Government give a definite yes or no answer in specific cases of therapeutic work?

A: Only courts and tribunals can decide legal cases, and they do so on the basis of all the facts in the case and having heard the arguments from both sides. Neither Government Ministers nor officials can make legal decisions on real cases. Our advice is intended to help clarify what the law means, and we have suggested the sorts of questions that need to be asked to establish whether the minimum wage applies in particular cases. But ultimately there is no substitute for independent legal advice.

Q: Can disabled workers with very low productivity waive their rights to the national minimum wage?

A: No. Section 49 of the Act prevents workers from contracting out of their entitlement.

Q: Does the national minimum wage apply to work experience/short term tasters?

A: It may do. It will depend on whether the individual has been employed under a contract (if he gets paid for the work, is given set hours, and can be disciplined for failing to turn up, for example, he may well be working under a contract). Some individuals will be free to come and go as they wish and will receive no payment for their work, in which case the minimum wage will not apply as they will not count as workers.

Q: Does the national minimum wage need to be paid to individuals who, because of their disabilities or illness, are not productive?

A: An individual's productivity is irrelevant. The question is simply whether or not that individual is working under a worker's contract. If he is working under such a contract he must get paid the minimum wage. Of course if he is off work due to illness, the minimum wage does not apply and other statutory provisions become relevant.

Q: Do workers' co-operatives have to pay the national minimum wage to their members?

A: A member of a co-operative may also be employed by that co-operative. It depends whether or not the work is done under contract and how the work is rewarded.

This is the first edition of the note on National Minimum Wage and Therapeutic Work. The Department of Trade and Industry would welcome any feedback in the form of comments, suggestions and further scenarios that might be included, so that a second edition can be issued, if appropriate, in 2001. Letters should be addressed to:

The Minimum Wage Team, UG121, 1 Victoria St, London SW1H 0ET
or you can send your comments by email to: Team.NMW@dti.gov.uk

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