

The Case for the Real Living Wage in Robinson

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Executive Summary

1. As of 2018, Robinson had the fewest workers in the University working on the Real Living Wage, with the lowest paid workers earning the minimum wage.
2. Businesses have overwhelmingly found that the Real Living Wage has improved their reputation, with few reporting significant negative effects.
3. Robinson is financially secure and wealthy enough to afford paying the Real Living Wage to all workers with little or no impact on operational spending.
4. Similar higher education institutions have reported benefits and few negative impacts from becoming Living Wage Accredited.



What is the Living Wage?

The real Living Wage, as calculated by the Living Wage Foundation, is formulated to account for the real cost of living in the UK, as opposed to the government's 'National Living Wage' which does not account for variation in living cost depending on location and is only aimed to increase the minimum to 60% of median earnings by 2020.¹ The Resolution Foundation calculates the real Living Wage every year according to evidence on living standards throughout the UK, and a basket of goods drawn from the Minimum Income Standard.²

The current real Living Wage is calculated at £9.30 an hour outside London and £10.75 in London. Every year the rate is recalculated, and accredited institutions are given six months to readjust to the new wage.³ Businesses voluntarily sign up to pay the Real Living Wage, unlike the Minimum Wage or National Living Wage. Currently, over 180,000 employees have received a pay rise as a result of the Living Wage campaign, and nearly 6,000 businesses have become accredited Living Wage Employers.⁴

Why pay the Living Wage?

Good for society

Accreditation should be primarily considered on the grounds that it is a socially responsible practice for any employer. According to a 2018 article by charity Full Fact, the average real wage still has not recovered to pre-2008 levels, with London and the South-East hit disproportionately hard.⁵ As well as making day-to-day survival harder for many workers, the Community Mental Health Journal last year documented adverse effects on mental health. The study of 4000 workers showed that low paid workers were significantly more likely to be diagnosed with paranoid personality disorder and avoidant personality disorder, and on examination almost a fifth of all low income workers showed symptoms of anxiety or depression.⁶

This affects the city of Cambridge and its surrounding areas more acutely than anywhere else in the country. Whilst the average income is relatively high, the concentration of high

¹ <https://www.livingwage.org.uk/what-real-living-wage>

² <https://www.livingwage.org.uk/calculation>

³ Ibid

⁴ <https://www.livingwage.org.uk/what-real-living-wage>

⁵ <https://fullfact.org/economy/how-have-wages-changed/>

⁶ Lopes, B., Kamau, C. & Jaspal, R. The Roles of Socioeconomic Status, Occupational Health and Job Rank on the Epidemiology of Different Psychiatric Symptoms in a Sample of UK Workers. Community Ment Health J 55, 336-349 (2019) doi:10.1007/s10597-018-0259-3



pay knowledge-based jobs means that the discrepancy is even more pronounced. A study in 2018 found that for the second year in a row Cambridge was the most unequal city in the UK, with 6% of all residents taking in 19% of all income generated in the city, and the poorest 20% accounting for just 2%.⁷ Whilst academics are often given support by the University to shield them against increasing living costs, those without these kinds of protections face a drop in overall living standards. The article that accompanied the study saw Cambridge residents point out the perpetuation of a 'town and gown' divide that persists in the city.⁸

The University and its colleges are key in perpetuating this inequality, being a significant source of employment in the city, and holding vast amounts of wealth. By not paying the Living Wage, colleges choose to play an active part in national trends. Colleges paying their staff less than the Living Wage are perpetuating the inequality between students and workers, and drawing the lines in the divide between the 'town and gown'. The atmosphere and community in college suffers as a result of this stark social division. While the University and its colleges may be academic spaces, they are also a part of a local community; by paying staff less than Living Wage, colleges are turning a blind eye to the needs of this community and its responsibility to the city and its workers. As educational institutions with charitable status, colleges should be leading the way in responsible employment practices, offering security and a guarantee of a wage that workers can live on.

Good for business

The Living Wage Foundation conducted a study in 2017 with Cardiff Business School, consulting Living Wage Accredited organisations about the benefits and problems with implementing the Real Living Wage. Organisations cited their improved reputation as an employer as chief among benefits, specifically:

- 86% of companies reported gaining reputation in the study.⁹
- Over 40% of respondents to the survey cited "that a major purpose was to differentiate their organisation 'from others in the same industry or performing the same activity'. The latter response indicates that some employers have seen accreditation as a source of competitive advantage."¹⁰
- 67% employers reported a major reason was to 'develop a reputation as a good employer'.¹¹
- 33% reported that a major intention was to 'improve recruitment and retention of employees paid below the Living Wage'.¹²

⁷ <https://www.theguardian.com/uk-news/2018/feb/04/cambridge-most-unequal-city-population-divide-income-disparity>

⁸ Ibid

⁹ Heery, E., Nash, D., & Hann, D. (2017). The Living Wage-employer experience. Cardiff Business Cardiff, [available at: www.cardiff.ac.uk/__data/assets/pdf_file/0008/722429/The-Living-Wage-Experience-Report.pdf].

¹⁰ Ibid

¹¹ Ibid

¹² Ibid



Potential Cost Impacts

The Living Wage Foundation and Cardiff Business School Report similarly details the impact of paying the Living Wage. The most commonly reported effect - from 70% of those surveyed - was that the cost absorption of the Living Wage did not result in significant changes to employment practices. Another concern that has been raised is that paying the Living Wage results in having to adjust pay differentials for workers above the lowest wage, thus 'snowballing' the cost. However, only 30% of respondents reported having to do this, as opposed to the 70% who were not affected in any significant capacity.¹³

Under 10% of businesses reported severe negative effects. Some businesses reported scaling back investment and increasing prices, and even fewer reported having to reduce the number of Living Wage employees. However, it is important to note that businesses more significantly affected were those with a large number of employees below the Living Wage and tended to be recently accredited.¹⁴

¹³ Heery, E., Nash, D., & Hann, D. (2017). The Living Wage-employer experience. Cardiff Business School, Cardiff,

¹⁴ Ibid



Robinson College and the Living Wage

Robinson College refused to respond to a Freedom of Information Act request sent in July 2019 regarding employment practices, citing the reasons that

- a. Ability to recruit and retain staff severely affected when Robinson is compared negatively to other colleges who are its main competitors in terms of the staffing pool.
- b. Loss of conference clients/business due to reputational damage.
- c. Decrease in student applicants due to reputational damage.¹⁵

We would suggest that a remedy to these concerns about information regarding college employment practices becoming known to the public would be to become Living Wage Accredited. Given that businesses have overwhelmingly claimed benefits to their reputation as a consequence of paying the Living Wage, it follows that Robinson might in fact gain a competitive advantage in this regard, attracting a pool of workers to the limited market of colleges that do pay the Living Wage (see Taylor's Table 2019).¹⁶ Socially responsible employment practices may also improve Robinson's reputation to a pool of potential students who take how support staff are treated as a factor in choosing colleges.

We have set out below the evidence that Robinson could absorb the higher cost of the real Living Wage with minimal impact on operational spending.

The Cost to College of Paying the Living Wage:

The current estimate for the annual cost of paying the Living Wage is approximately £110,000. This figure was calculated using the following information:

- 128 staff in college are not paid a Living Wage (from a Freedom of Information Act request in 2018).¹⁷
- The minimum wage is £8.21/hour
- The Living Wage is £9.30/hour (Living Wage foundation)¹⁸

We have assumed that all 128 employees are paid minimum wage and on an average weekday of the year half of those employees each take a 6-hour shift. The result is a maximum cost of £108,800 per year to increase the wages of those staff to a Living Wage. This is most likely an overestimate of the real cost to college.

Putting this figure in context:

Whilst our estimated figure may seem like an extraordinary expense on a yearly basis, we must be careful to contextualise this in the annual income of the college, and against current

¹⁵ https://www.whatdotheyknow.com/request/employment_practices_2019_2041#incoming-1451126

¹⁶ <https://www.cusu.co.uk/about/cusu-campaigns/ethical-affairs/living-wage-campaign/>

¹⁷ https://www.whatdotheyknow.com/request/data_on_wages_and_employment_pra_23#incoming-1273994 ¹⁸ <https://www.livingwage.org.uk/what-real-living-wage>



expenditure. The graph below compares the cost of the real Living Wage to various categories of income and expenditure.

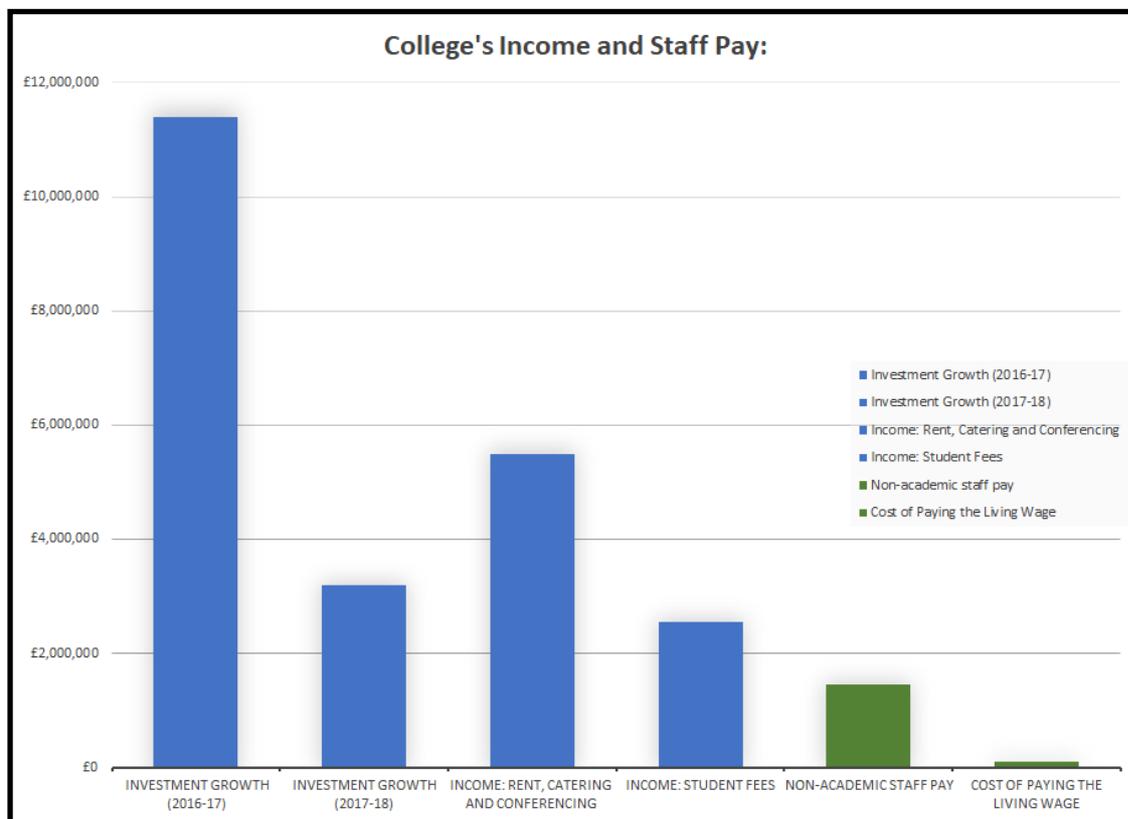


Figure 1: The cost of the Living Wage, as compared to income and expenditure in individual categories.¹⁹

It is evident from this that the cost of paying the Living Wage pales in comparison to the annual growth of Robinson's endowment, and does not significantly increase the overall expenditure on the wages of non-academic staff. College are able to take out 4% of total investments for expenditure, which for 2018 would have been around £2,000,000. Only 5% of this would be needed annually (representing 0.002% of overall investments) in order to pay the Living Wage. Assuming the rapid growth in the value of investments will continue, this percentage would shrink every year.²⁰

¹⁹ Sources: Robinson College Statutory Accounts: 2017: P3, 2018: P3,4,16-18.

²⁰ Robinson unfortunately released their 2019 accounts after the writing of this report, so they do not feature in any of the graphs generated. They can be summarised as a relatively weak year for the college. This is due to both a relatively poor return on investment (£2 million, 3.4%) and an increase in the 'defined pension provision' - meaning the cost of pensions to Robinson has increased. The college itself, however, states in the accounts it is in a financially strong position. We would therefore suggest that this exceptional year does not conflict with our analysis. The accounts can be found here: <https://www.robinson.cam.ac.uk/about-robinson/foia-publications>.

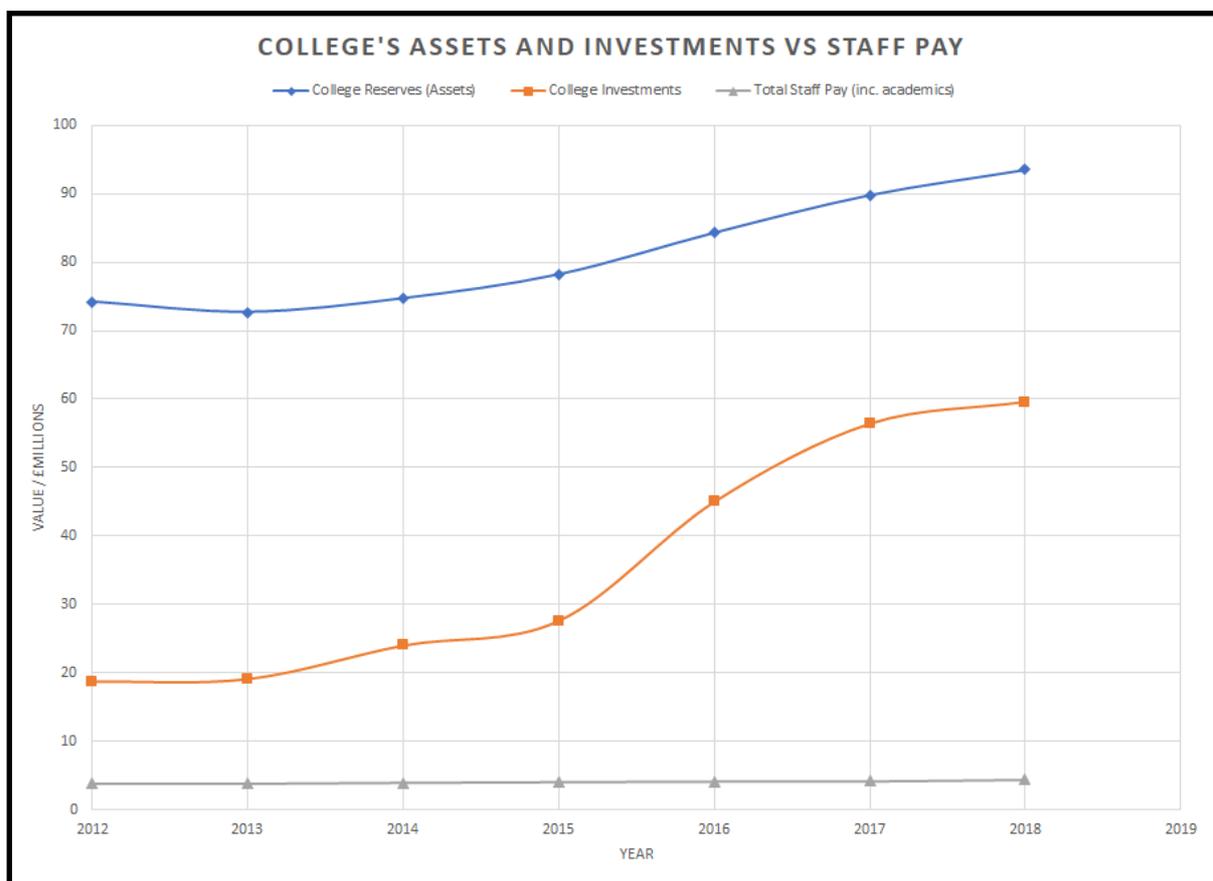


Figure 2: Investments have experienced a significant boost since 2012, whilst staff wages have stagnated.²¹

Furthermore, whilst investments and the college's assets have seen a significant increase since 2014, workers have not seen any benefits, as detailed below:

Misconceptions In Robinson:

When students have made enquiries about the viability of paying the Real Living Wage to college employees, a number of different justifications have been put forward. Below we have detailed our responses to common arguments students have heard.

"Robinson is a new college which needs to achieve financial security"

²¹ Sources: Robinson College Statutory Accounts: 2012-2018 P2,3 under "Income and Expenditure" found at <https://www.robinson.cam.ac.uk/about-robinson/foia-publications>

Robinson is, in fact, a relatively wealthy institution. Despite being the newest of colleges, it is ranked 24th out of the 31 colleges in terms of its assets.²² It is also important to note that the one of the two accredited colleges, Queens', has a lower student to asset ratio, and a large outstanding loan similar to Robinson's. It is therefore difficult to conclude that Robinson has financial circumstances exceptional from all other colleges paying the Living Wage.

"Robinson runs a budget deficit and so can't afford to make their financial position worse"

The most important thing to note here is that college's wealth is growing: £3.2 million last year and £11.4 million the year before that.²³ These large investment gains are not counted in the operating budget, masking significant annual growth in college assets. It is therefore somewhat misleading to use the operational deficit as a measure of Robinson's capacity to pay the Real Living Wage. Although technically true that college uses "Adjusted Operating Deficit" which last year was £302,000, college actually ran an "Operating Surplus" of £72,000.²⁴ This adjustment is made due to the way the accounts are structured, whereby interest on a large outstanding loan that the college is paying back has been moved into operational costs, but investment growth has not.

"Robinson will need to be redeveloped and so we have to keep saving money"

This statement at least recognises the fact that Robinson is amassing a vast amount of wealth. However, we again point to the fact that paying the Real Living Wage is a comparatively small proportion of the annual growth of assets. Growth would be largely unaffected by giving 5% of annual income to essential staff. Furthermore, the college included in its operating costs an annual salary of around £92,000 to the Warden of the college in 2018, and further thousands in expenses for his annual international trips. This made him the highest paid master of any college.²⁵ Therefore, one might question why Robinson feels it can spare the highest expenses for its top paid staff, whilst paying the minimum wage to those at the bottom of the pay scale.

²² <https://web.archive.org/web/20190314162827/http://www.admin.cam.ac.uk/reporter/2018-19/weekly/6538/section1.shtml>

²³ https://en.wikipedia.org/wiki/Colleges_of_the_University_of_Cambridge Ranked in terms of "net assets"²⁴ "Income and Expenditure" portions of statutory accounts 2017 and 2018

²⁵ <https://www.varsity.co.uk/news/15869>



The Living Wage Precedent: experiences of Higher Education and SMEs in becoming Living Wage accredited

There are currently 120 Higher Education institutions within the UK who are accredited as Living Wage Employers by the Living Wage Foundation²⁶. Recent accreditations this year include the University of Manchester, University of East Anglia, and the University of Bath. Importantly, this number includes 17 Oxbridge colleges of varying different sizes and with varying levels of financial endowment (examples include Queens' College, Cambridge; St Hilda's College, Oxford; and Girton College, Cambridge).

Some of these institutions' experiences of implementing the Living Wage, reasons for doing so, and the overwhelmingly positive benefits gained from this decision have been cited in several compelling and rigorously researched reports.²⁷ Overall, these reports, taken together, 'disprove the assumption [in the education sector] that increases in staff wages inevitably lead to a trade off in employment, job security or success within higher education'.²⁸ On the contrary, they make a conclusive case highlighting the importance of the Living Wage in ensuring a collegiate higher education sector which continues to flourish. Their examination of Living Wage employers', and in particular universities', experiences of becoming Living Wage accredited can be summarised through the following two points:

1: Cost to Business

The argument that Living Wage implementation leads to inevitably negative commercial slowdown and an unmanageable wage bill is based more on myth than reality. In fact, the commercial benefits of providing the Living Wage are well documented

- **Cost to business:** The experience of Queen Mary, University of London is a valuable case study.²⁹ Queen Mary agreed to move all of their cleaning staff from

²⁶ <https://www.livingwage.org.uk/accredited-living-wage-employers>

²⁷ Reports on the positive benefits of living wage accreditation are voluminous. Examples include: Willis, J. et al] The business case for the living wage: The story of the cleaning service at Queen Mary, University of London, January 2009 [available here:

<https://www.qmul.ac.uk/geog/media/geography/livingwage/docs/livingwagereportQM.pdf>]; Jenson, N. and Willis, J. The prevalence and impact of the Living Wage in the UK: a survey of organisations accredited by the Living Wage Foundation, October 2013 [available here:

<https://www.qmul.ac.uk/geog/media/geography/livingwage/docs/FINALReportLWFsurvey2013.pdf>]; Werner, A. and M. Lim. Putting the Living Wage to Work: Strategies and Practices in Small and Medium Sized Enterprises (SMEs) October 2016 [available here: <https://www.barrowcadbury.org.uk/wp-content/uploads/2016/10/University-of-Middlesex-Putting-the-Living-Wage-to-Work-October-2016.pdf>].

²⁸ Hulme, A. 'Blog: University Challenge - why universities should pay a real living wage', 13th August 2018 (via the Living Wage Foundation website [available here: <https://www.livingwage.org.uk/news/blog-university-challenge-why-universities-should-pay-real-living-wage/>].

²⁹ The experience and impact of Queen Mary's decision to pay the living wage, alongside other informative research on the London living wage, has been rigorously documented by Professor Jane Willis and her team over several years. For a summary of the research, and links to individual aspects, see: <https://www.qmul.ac.uk/geog/livingwage/>.



KGB Cleaning to in house employment in 2008, paying staff the Living Wage in the process. For the budgetary year 2008/2009 Queen Mary paid a cleaning bill of £2,197,000. Whilst this was an increase from the KGB Cleaning bill of £2,119,000 in year up to the end of July 2007, it also included a one off 4% pay rise alongside an annual increment. The overall increase, then, was not as high as one might expect.³⁰ Indeed, as Professor Jane Willis and her colleagues at Queen Mary noted in a report on the implementation: 'the in-house service has cost only slightly more than the service provided by KGB including the start-up costs of the move back in-house'.³¹ She concludes that this is evidence against the 'dire predictions of escalating costs' which often prevent employers from implementing the Living Wage.³²

- **Efficiency:** In terms of service efficiency within the HE sector, 83% of the 106 respondents to a survey run by Queen Mary after their Living Wage implementation noted marked improvements in the presence, motivation, and overall efficiency of cleaning staff throughout the University, thereby demonstrating a close relationship between Living Wage provision and operational efficiency.³³ In addition to this, alongside Queen Mary's particular operational benefits, a higher rate of employer retention post-Living Wage implementation was reported as a major benefit by employers, thereby reducing the expense to HR departments of recruiting and training new staff.³⁴
- **Reputational advantages:** Recent surveys of Living Wage accredited employers have demonstrated that the vast majority view Living Wage accreditation as having led to enhancements in their overall reputations and attendant benefits to their business operations. In a recent study by Cardiff Business School interviewing over 840 living-wage employers, 93% of respondents reported that Living Wage accreditation had 'enhanced the organization's general reputation as an employer', 78% suggested that it had 'enhanced the organization's general or corporate reputation', and 64% that it had 'differentiated the organization from others in the same industry or activity'.³⁵ The average number of benefits reported by the institutions interviewed was 8.7.³⁶ In addition, between 20-25% reported tangible business benefits in terms of securing more contracts with clients.³⁷ The report's authors conclude from this that many small to medium enterprises viewed the initial costs arising from living-wage implementation as a long-term investment in their business's reputation and attractiveness to potential clients, and that the data demonstrates that they have seen definitive pay-offs from this investment.³⁸

³⁰ Willis, J. et al The business case for the living wage, p. 10.

³¹ Ibid

³² Ibid

³³ See Willis, J. et al. The business case for the living wage, p. 11.

³⁴ See Werner, A. and M. Lim, Putting the Living Wage to Work, p. 20; Heery, E. et al. The Living Wage Employer Experience, p.30. The same page also reports over half of respondents noting the benefits to HR costings and outcomes with nearly half (45%) reporting a higher quality of applicant to advertised roles.

³⁵ Heery, E. et al. The Living Wage Employer Experience, , p. 30.

³⁶ Ibid., p.29

³⁷ Ibid., p.31

³⁸ Ibid., p.29



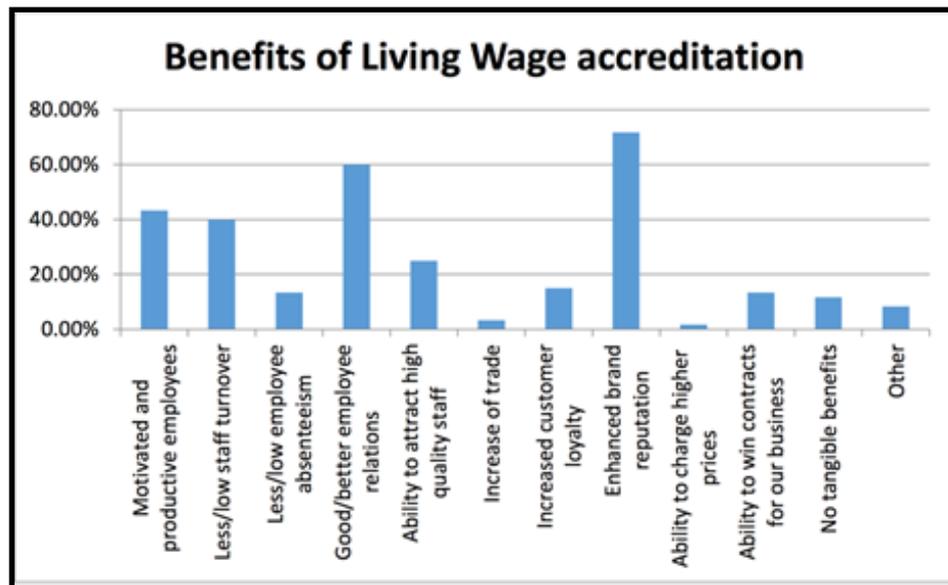


Fig 3: Benefits of Living Wage accreditation as perceived by employers (source: Werner, A. and Lim, A. Putting the Living Wage to Work, p.14).

Cost to business conclusions: Queen Mary and the experiences of other Living Wage accreditors demonstrate that whilst an initial raise in expenditure to pay the Living Wage to staff is necessary, it is neither financially unsustainable in the long-term or commercially damaging. The vast majority of Living Wage employers saw their accreditation as an investment in both their own commercial reputations and the happiness and productivity of their staff. Robinson, as a new and future-orientated college, would see huge benefits to its reputation, and as a living-wage pioneer, stand out amongst colleges in proudly displaying its values as an educational institution committed to social fairness and the welfare of its staff. Furthermore, the experience of Queen Mary and other businesses demonstrates that Living Wage accreditation leads to tangible benefits to operational efficiency and lower staff turnover, again demonstrating the sound business sense Robinson would be acting upon in accrediting with the Living Wage Foundation.

2: Workplace Cultures

Studies show that all employers who have implemented the Living Wage have noted real improvements in the sense of community, happiness, and overall positive atmosphere within their workplace cultures. Universities' and HE institutions have recognised that fostering a collegiate educational community is greatly aided by Living Wage accreditation.

- **Staff Morale:** Studies have demonstrated that there is a direct correlation between staff morale and the provision of the Living Wage.³⁹ Alongside the clear operational and economic benefits for staff noted above, more general boost to morale and sense of belonging to institutional communities have been cited by universities in particular as both motivators for and benefits of Living Wage accreditation. Dean Curtis, Chief Administrative Officer for Queen Mary, has cited an increase in the sense of a communal staff identity at the University since bringing cleaners in-house and paying them the Living Wage: for Curtis, 'making cleaners staff changes the dynamic' and has added to a shared idea of belonging at Queen Mary.⁴⁰ This is in addition to Jane Willis' study which found 89% of cleaners at Queen Mary viewed a positive increase in their morale and work conditions after being moved in-house and paid the Living Wage.⁴¹ Furthermore, universities such as Wolverhampton and colleges such as Hertford, Oxford have explicitly cited the desire to help 'morale and motivation' and aid staff who are the 'indispensable bedrock of college life' as driving their decisions to pay the Living Wage.⁴² This should be taken alongside wider reports from SMEs on the benefits to staff morale and overall relations between staff and employers gained from implementing the Living Wage.⁴³
- Robinson's decision to implement the Living Wage would significantly help the development and fostering of communal identity within the college. Staff morale would increase; Robinson would be seen to be publicly acting on values foundational to higher education environments, such as social responsibility, equality, and the inclusion of all in collegiate identity.

Workplace cultures conclusions: This examination of the historical implementation of the Living Wage within higher education and business environments, and the reports which methodically and independently document it, demonstrates three central points. First, a variety of higher educational institutions of varying size and financial capital have committed investing in their staff and institutional cultures by becoming living-wage accredited, demonstrating its feasibility for Robinson's particular commercial context. Second, the implementation of the Living Wage, which will lead to an increase in the wage bill, is best seen as a net-investment in both Robinson's commercial and educational reputation and its operational efficiency which is not as high as might be expected. Third, Robinson's decision to pay its staff the Living Wage, as is shown by Queen Mary and other HE institutions, would simultaneously demonstrate its commitment to its founding values, and aid the strength of its communal identity as a college.

³⁹ See for example Reich et al. (2005) 'Living Wage policies at the San Francisco airport: Impacts on workers and businesses. *Industrial Relations*, 44, 106-38 and Fairris, D. and Reich, M. (2005) The impact of living wage policies: Introduction to the special issue. *Industrial Relations*, 44, 1-13

⁴⁰ Dean Curtis quoted in Aditya Chakraborty's article for *The Guardian* ('The cleaners who won fair wages and a way to belong'), 18 July 2018 [available here: <https://www.theguardian.com/commentisfree/2018/jul/18/cleaners-fair-wages-university-in-house-working-lives>].

⁴¹ See Willis, J. et al., *The business case for the living wage*, p. 17.

⁴² Jenson, N. and Willis, J. *The prevalence and impact of the Living Wage in the UK*, p. 20; 'Living Wage' statement by Principal Will Hutton, sourced from Hertford College, University of Oxford website, 23 January 2015 [available here: <https://www.hertford.ox.ac.uk/news/living-wage>].

⁴³ Werner, A. and M. Lim. *Putting the Living Wage to Work*, p. 19.



Summary of recommendations

Looking at evidence from the Living Wage Foundation and precedent at comparable institutions, the Cambridge Living Wage Campaign has drawn up the following demands for colleges seeking to move towards a fair deal for workers:

Fair Pay

- Gain Living Wage accreditation with the Living Wage Foundation
- Pay the Cambridge Living Wage (£10 p/h)⁴⁴
- Close the gender and race pay gaps

Fair Conditions

- Gain living hours accreditation with the Living Wage Foundation.⁴⁵
- Ensure safe, respectful and fair working conditions for all staff.
- Provide channels for regular feedback about working conditions.

Fair Representation

- Recognise workers' right to unionise.
- Ensure democratic representation on college committees for nonacademic staff, members and union representatives.
- End the practice of outsourcing and bring all workers in house.

On the basis of the above evidence, we believe that Robinson is wealthy and secure enough as an institution to easily pay a Living Wage to all workers. Given the rapid growth of the college endowment over past years, the college can no longer use its operational deficit to justify paying the minimum wage to most casual staff. Robinson often escapes scrutiny through its claims that the college 'cannot afford' to adjust its operational accounts to cut student costs or pay workers more, but this is demonstrably not true. Additionally, we would stress that none of the funds for this should, or need to be charged to students in any form, whether in higher rents or cuts to JCR funding.

As outlined above, there are positives to be gained from becoming Living Wage accredited. The college's reputation has been damaged amongst students who were led to believe that Robinson is an institution with a modern, broad social outlook, only to find out that its practices do not live up to its name. In accrediting with the Living Wage Foundation, Robinson could prove that it is an institution that takes responsibility for the ever-widening gulf between rich and poor in Cambridge. This may help Robinson attract students to the college, as well as encouraging colleges with larger endowments to adopt a similar policy, thus making it a trailblazer in the University.

⁴⁴ <https://www.cambridge-news.co.uk/news/cambridge-news/time-cambridge-living-wage-introduced-15372719>

⁴⁵ <https://www.livingwage.org.uk/living-hours>



Whilst Robinson becoming Living Wage Accredited is the main aim of this paper, the Living Wage Foundation and central Cambridge Living Wage Campaign are right to point out this is only one part of improving working conditions. When debating this issue, management should bear in mind that ending outsourcing would allow the college to be more accountable to workers about their conditions; that workers deserve a voice in college committees, and union representation; that workers should be entitled to decent hours in line with the European Work Time Directive in order that they can have a reasonable amount of leisure time.⁴⁶

We sincerely hope the college accept these proposals and works with students and staff on the issue of pay in the college. We await a response from the college on this issue within the next two weeks outlining the college's decision on this matter, and would be happy to discuss these recommendations in further consultation with college management.

The Robinson College Living Wage Campaign.

⁴⁶ <https://www.health-ni.gov.uk/articles/european-working-time-directive>

