

Ms Jenna Oman-Power
National Ambulance Service
North Leinster Area Headquarters
Phoenix Hall,
St. Mary's Hospital, Phoenix Park,
Chapelizod,
Dublin 20

Dear Ms Oman Power

I refer to your letter which outlines the amount of hours which you have calculated as my loss of earning under the Public Service Agreement 2010- 2014. I am not in a position to agree your estimate without an itemised break down of the equation and calculations you applied in my case.

Further to this you refer to LCR 20313. In this regard LCR 20313 does not preclude me from the terms of the PSA in that I am entitled to all actual losses and therefore you must include in your calculations the reverse effect of the change in the following

1. Overtime rate for Sundays
2. Overtime rate for Public holidays
3. Overtime rate for time x 1.5
4. Overtime rate for time x 2
5. Overtime paid at 1.25 changed from 1.5
6. First overtime x1 hour of each week x 52 weeks not paid
7. Rostered overtime hours lost as a result of 40-hour week change to 39-hour week
8. Loss of basic pay rate by 7.5% x 1.5 times the loss

Further to this LCR 20273 30/03/2012. Jenkinsen states quite clearly that all losses are to be paid in keeping with PSA and that losses referred to are not specifically rostered overtime.

This is clarified further in LCR 20943 12/03 2015 Jenkinsen decides that there is no dispute on this point.

Notwithstanding these points I would direct you to the precedent set between the HSE and PNA and SIPTU representing workers at Dundrum Central Mental Hospital in that all of the decisions by the LRC and of the terms of the Public Service Agreement have been applied.

Payment of actual losses under the PSA agreement have been paid since last September 2015. These payments were paid as one payment as the agreed payment date for losses under the terms of the PSA agreement had long passed.

I suggest that the above itemised losses should be forwarded to central payroll and they can then be applied to each member from the relevant dates applicable. Central payroll will then apply the logic to each member pay records. All hours worked at the relevant time will be specific to each individual employee. As this is a pay issue only, the working location of each employee is irrelevant.

I will forward to you a copy of the Dundrum agreement to reference,

I trust this clarifies my position,

Regards,
