

Making Work Pay: Call for evidence on unpaid internships

Arts Students' Union submission

Questions on Unpaid Internships and internships paid below the National Minimum Wage

131. To what extent do you agree with the following statement: Internships which are not part of an educational or training course should be paid at least the National Minimum Wage.

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree
- do not know
- prefer not to say

Rationale for responding in this way: In UK law, if an intern is a “worker” they’re already entitled to (at least) the national minimum wage. Calling a role “an internship” doesn’t change that. Clear pay rules improve access and diversity. This is critical in creative fields where unpaid roles are still common and exclusionary.

In 2025, Arts SU completed our Craft Your Future research, about UAL students’ views on their aspirations and fears about their future careers in creative industries. UAL students overwhelmingly aspire to build creative careers (82%), but 80% say they do not feel financially prepared for early career stages. Nearly 1 in 5 report feeling pressured to work unpaid or underpaid to build a portfolio. In such conditions, unpaid internships exacerbate inequality, particularly when 42% cite London’s high cost of living as their top barrier. Paying at least the National Minimum Wage ensures creative work remains accessible to talented graduates, not just those who can afford to subsidise unpaid labour.

132. What compensation do you think is fair?

- travel expenses
- meal expenses
- discounts or benefits
- accommodation expenses
- equipment and materials expenses
- uniforms and work clothing
- training and development
- other

- do not know
- prefer not to say

Response: Other. Pay at least the national minimum wage (preferably the Real Living Wage).

Half of our members report rare or no real-world experience through their course, so early jobs or internships are often their first industry contact. Making these opportunities paid acknowledges their real contribution and enables students from lower-income backgrounds to take them up.

I33. How long should internships which are not part of an educational or training course last?

- up to 1 week
- between 1 and 2 weeks
- between 2 and 4 weeks
- between 1 and 3 months
- between 3 and 6 months
- between 6 months and 9 months
- 1 year
- over 1 year
- other (please specify)
- do not know
- prefer not to say

Response: Other.

Anything beyond 4 weeks must be paid (preferably from day one). Unpaid periods should be limited to short work shadowing only. Most internships should be capped at 3 months with clear learning outcomes. We believe that a longer period than 3 months is a junior work role, not an internship. Most unpaid or underpaid internships run beyond 4 weeks, and [evidence-led proposals from the Sutton Trust](#) back an explicit 4 week limit for unpaid roles and pay for anything involving productive work.

I34. Do you have any other comments or suggestions regarding internships? If yes, please state these below.

Based on our 2025 *Craft Your Future* research, only 14% of creative students have regular access to real-world experience during their course, and 50% have rarely or never engaged with industry. Internships remain one of the most effective pathways into creative work, but they need to be compensated robustly, to ensure parity of access for graduates from all backgrounds.

Unpaid and underpaid internships remain common in the arts and are strongly linked to class exclusion. 71% of unpaid or underpaid internships last over 4 weeks, and 40% of unpaid interns rely on parental support, up from 26% in 2018.

According to the Sutton Trust, employers themselves report that banning unpaid internships over four weeks would not reduce the number of opportunities they provide, with around 75% of employers agreeing. For London-based roles common in the arts, the Real Living Wage is a better equity benchmark than statutory minimums.

National Minimum Wage already applies when “interns” meet the worker test, but clearer definitions and enforcement will particularly benefit creative students and graduates.

We therefore believe:

1. The government should provide legal clarity and enforcement, ensuring that all internships longer than 4 weeks are paid at least the National Minimum Wage (and preferably the Real Living Wage for creative internships often based in London or creative hub cities).
2. HMRC should investigate “expenses only” internships, which are common in the fashion and media industries.
3. Publicly funded arts employers and institutions must guarantee paid placements.

Questions on unpaid work trials

I35. Do you believe all work trials should be compensated?

[Yes / No / Do not know/ Prefer not to say]

Rationale: If a trial provides value to the employer (productive work), it meets “worker” tests and should be paid.

I36. If you believe work trials should be compensated, what level of compensation do you believe is fair?

- travel expenses
- meal expenses
- discounts or benefits
- accommodation expenses
- equipment and materials expenses
- uniforms and work clothing
- training and development
- paid at least the National Minimum Wage
- other

- do not know
- prefer not to say

I37. How long should work trials last?

- up to 1 week
- between 1 and 2 weeks
- between 2 and 4 weeks
- other (please specify)

Response: Other (please specify)

Practical tests should be short (normally up to 3 to 4 hours, and maximum one day).

Anything longer should be a paid short-term contract or probation period in a role.

Prolonged trials often act as substitutes for paid labour and breach the intent of National Minimum Wage laws. Creative graduates (especially in design, fashion, and media) often face multi-day unpaid “test projects.” These should be classed as work. Short, observed tasks or portfolio reviews should suffice for assessment.

I38. Do you have any other comments or suggestions regarding work trials? If yes, please state these below.

Work trials must assess suitability, not replace paid shifts. Employers should outline learning outcomes and limit duration. Longer “trials” risk exploiting new entrants and undermine trust in creative employment.

Questions on voluntary workers

I39. Do you believe all voluntary workers should be compensated?

[Yes / No / Do not know/ Prefer not to say]

Rationale: No (for wages), but yes to out-of-pocket expenses as standard. Genuine “voluntary workers” at charities are exempt from NMW if they only receive limited expenses. That exemption should remain to preserve volunteering routes, but must not be used to rebadge what is actually paid work.

I40. If you answered yes, what level of compensation you think is fair?

- travel expenses
- meal expenses

- discounts or benefits
- accommodation expenses
- equipment and material expenses
- uniforms and work clothing
- training and development
- other (please specify)
- do not know
- prefer not to say

Rationale: This ensures inclusion (no one should be left out because they can't afford to volunteer) while keeping the legal boundary between volunteers and workers clear.

I41. Do you have any other comments or suggestions regarding voluntary workers? If yes, please state these below.

All volunteer workers should receive written volunteer agreements stating no obligation to attend, no reward in cash or kind, and expenses reimbursed. Where set hours, targets, or promises of future paid work exist, that person is a worker and must be paid National Minimum Wage.

Questions on volunteers

I42. Do you believe all volunteers should be compensated?

[Yes / No / Do not know/ Prefer not to say]

Rationale: To protect genuine volunteering and widen participation, while avoiding the creation of de-facto unpaid jobs.

I43. If you answered yes, what level of compensation you think is fair?

- travel expenses
- meal expenses
- discounts or benefits
- accommodation expenses
- equipment and material expenses
- uniforms and work clothing
- training and development
- other (please specify)

- do not know
- prefer not to say

Rationale: Removes cost barriers for lower-income students and graduates.

I44. Do you have any other comments or suggestions regarding volunteers? If yes, please state these below.

Covering expenses supports diversity among volunteers, including students from less affluent backgrounds and international students who face visa restrictions on paid work.

Questions on work shadowing

I45. Do you believe all work shadowing opportunities should be compensated?

[Yes / No / Do not know/ Prefer not to say]

Rationale: Pure shadowing (observing, with no productive tasks) is outside NMW, but to keep it equitable, employers cover out-of-pocket costs. This should be converted to paid if any productive work is done.

I46. If you answered yes, what level of compensation you think is fair?

- travel expenses
- meal expenses
- discounts or benefits
- accommodation expenses
- equipment and material expenses
- uniforms and work clothing
- training and development
- other (please specify)
- do not know
- prefer not to say

Rationale: Basic fairness and access, especially in London-based creative settings.

I47. How long should work shadowing opportunities last?

- up to 1 week
- between 1 and 2 weeks
- between 2 and 4 weeks

- other (please specify)
- do not know
- prefer not to say

Response: Longer durations risk sliding into productive work and should then be paid.

I48. Do you have any other comments or suggestions regarding work shadowing? If yes, please state these below.

Work shadowing is valuable, especially since only 14% of students currently access real-world experience. However, once a student undertakes productive work, the placement must transition to a paid internship. Expenses should always be reimbursed to remove barriers for lower-income and international students. Employers should set clear learning objectives and a daily schedule for work shadowing that excludes productive outputs. If outputs arise, employers must pay the National Minimum Wage.