



Department for
Business & Trade

Government response to Making Work Pay: call for evidence on unpaid internships

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1. Introduction

1. The government has set the country on a path of national renewal, building a Britain for all on the firm foundations of security, respect and opportunity. A fundamental aspect of this is creating an economy that delivers for working people: productive, profitable and growing. Modernising the UK labour market is central to this, ensuring workers have strong protections and the skills they need to thrive.
2. The Plan to Make Work Pay will help more people to stay in work, improve job security, boost living standards and create opportunities for all. Through our Employment Rights Act 2025 and our published Next Steps to Make Work Pay, we have been clear that we are committed to rebuilding the economy in a way that serves both workers and businesses, where all work is rewarded fairly.
3. A core element of this commitment is tackling low pay, poor working conditions, and poor job security. This includes banning unpaid internships, except when they are part of an educational or training course. Internships can provide a vital stepping stone for individuals, especially young people, to future opportunities, whether this is in their preferred field of work, or to expand their network and horizons.
4. Despite existing legal protections under the National Minimum Wage framework, we are concerned that too many people, particularly those seeking to enter certain professions, may still be expected to work for free. The government believes in the equality of opportunity and is committed to removing barriers that prevent individuals from accessing work based on their financial circumstances. Our commitment to ban unpaid internships reflects our vision for a fair and inclusive labour market where everyone has the opportunity to succeed based on their talent and not their financial circumstances. By creating a labour market that works for everyone, we will ensure that work pays, and that the UK remains the best place to live and work.
5. The call for evidence has gathered views from a wide range of stakeholders including businesses and employers, trade unions, and workers. This response document summarises the evidence gathered and sets out the next steps.

2. Executive summary

6. This government response summarises the findings of the 'Making Work Pay: call for evidence on unpaid internships' conducted between 17 July 2025 to 09 October 2025. The purpose of the call for evidence was to build our understanding of current practices for unpaid work in the workplace, where data and evidence are currently limited. It also sought to gather views from a wide range of stakeholders on unpaid internships and internships paid below the National Minimum Wage, unpaid work trials and work trials paid below the National Minimum Wage, voluntary workers, volunteers, and work shadowing.
7. The call for evidence sought views and evidence from employers and businesses, employees and workers, and other stakeholders on key issues relating to unpaid internships and other roles which may be unpaid or paid below the National Minimum Wage. It aimed to understand current practices in more detail, including the reasons for any non-compliance with National Minimum Wage legislation, and the scale of non-compliance.
8. Responses were collected through an online survey and written submissions. A total of **358 responses** were received. **A summary of the key findings** can be found below:
 - **Unpaid internships:** Most responding employers had offered internships (some unpaid or paid below the National Minimum Wage), viewed as voluntary or observational roles. The primary motivation for employees and individuals for undertaking or considering an internship was identified as using it as a pathway to paid employment. Many stakeholders suggested legally defining interns and supported banning unpaid internships unrelated to education or training. There was also support for more safeguards and for ensuring interns receive at least the National Minimum Wage.
 - **Work trials:** Most employers did not offer work trials; those that did provided either paid or unpaid options. Some believed banning unpaid trials would impact hiring, but several supported at least National Minimum Wage compensation and safeguards. Individuals felt trials should be brief and paid at least the National Minimum Wage. Stakeholders suggested trial durations from one to four weeks.
 - **Voluntary work:** Few employers reported using voluntary workers. When compensation was given, it mainly covered travel or meals. Many respondents recommended mandatory expense reimbursement and clear written role descriptions. Most individuals agreed on requiring written descriptions. Opinions were divided on mandatory compensation.

- **Volunteers:** About half of the respondents used volunteers, mainly for marketing, communications, or clerical tasks. Compensation, when given, typically covered travel and meals. Opinions were mixed on mandating expense reimbursement, but most agreed on the need for clear written role descriptions. Respondents also differed on compensation and the idea of legally defining 'volunteer'.
- **Work Shadowing:** Organisations reported offering work shadowing for up to four weeks, mainly involving observation and occasional tasks. Many favoured defining the role in law and setting limits on duration, with written outlines of responsibilities. Most placements are short and unpaid, though some recommended reimbursing expenses like travel and meals. Stakeholders were divided on compensation but generally support a maximum length for work shadowing.

9. The evidence gathered will help inform the government's next steps as we deliver our Plan to Make Work Pay, a core part of the mission to grow the economy, raise living standards, and create opportunities.

The Plan to Make Work Pay

10. The Plan is designed to help more people to stay in work, make work more secure and family-friendly, improve living standards and putting more money in working people's pockets while setting the country on the path of national renewal, built on the firm foundations of security, respect and opportunity. It will modernise employment rights for the twenty-first century, support a productive, profitable and growing economy, and ensure fair competition between businesses. The Employment Rights Act 2025 recognises that the world of work has fundamentally changed, driven by new technology, different working patterns and the rise of the gig economy. Many employment laws have not kept pace. The Act will close loopholes that allow a race to the bottom and extend to all workers the protections many responsible employers already offer, creating a level playing field that rewards good business and promotes fair competition.
11. By delivering this change together, we will back businesses who do the right thing and give hardworking people the job security and opportunities they deserve. That is what is in the interests of both employers and working people.

3. Conducting the call for evidence

12. The call for evidence ran from 17 July 2025 to 09 October 2025. Responses were invited through multiple channels to ensure accessibility and ease of participation. Stakeholders could submit their views online via the survey link on GOV.UK, by email, or by writing to the Department for Business and Trade. The breakdown of responses by stakeholder type and submission route is set out below.

Stakeholder	Number of survey responses	Responses received via email
Academic	77	5
Employers and businesses	51	1
Employee, worker or individual	115	2
Legal representative	3	0
Business representative organisation / Trade body	19	5
A trade union or staff association	4	2
Other (Please specify)	57	7
Do not know	5	0
Prefer not to say	5	0
Total	336	22

3.1 Method of analysis

13. The call for evidence responses was analysed using mixed methods. Closed components of questions were analysed using quantitative techniques and open-ended questions were analysed using qualitative techniques.
14. In analysing the responses, the following criteria was applied:
- 15.1 Partial responses were included. Where respondents answered any question, even if only one, their submission was counted as a response.
 - 15.2 Incomplete responses were excluded. Submissions containing only personal details without answering any questions were not counted.
 - 15.3. All respondents were presented with questions on all five areas which were tailored to reflect the capacity they were responding in:

- Employers and businesses
 - Individuals and workers
 - All other stakeholders
15. Some respondents chose to answer questions most relevant to their area of experience or interest, leaving others blank. For this reason, the response document reports the number of respondents who answered each section, rather than assuming all respondents answered all questions. Results are presented by topic area (internships, work trials, voluntary work, volunteers, and work shadowing) and by respondent type (employers, individuals and stakeholders).
 16. Any percentages provided in this response reflect the proportion of respondents who expressed a position on a specific question within the relevant respondent group and topic area. Responses marked as 'prefer not to say' (or where no meaningful text was provided, e.g. no substantive text or incomplete answers) were excluded from percentage calculations. Percentages may not total to 100% due to rounding and for multiple choice questions; totals may exceed 100% in cases where a respondent or group of respondents selected more than one option.
 17. Each written response was assessed for overall sentiment in relation to the statement. Responses were categorised as supportive, against, neutral, or mixed. A response was considered supportive where it expressed agreement with the statement or supported further intervention. It was considered against, where a response rejected the statement or favoured maintaining the current arrangements without change. Neutral responses provided information without indicating a clear position, while mixed responses contained elements of both support and opposition.
 18. This document provides a summary of the responses received. It does not attempt to capture every point raised, nor does it cover comments on issues outside the scope of this call for evidence.

4. Summary of question responses

4.1 Unpaid internships and internships paid below the National Minimum Wage

19. An internship is a period of work experience offered by an organisation, typically undertaken by young people looking to gain relevant skills. Internships can vary in duration, from a few days to over a year, and may involve tasks similar to those performed by paid employees.
20. The term 'intern' has no legal definition under UK law. Under the National Minimum Wage legislation, unpaid work is generally prohibited. Interns must be paid at least the National Minimum Wage if they are performing duties that qualify them as "workers" under employment law.
21. The National Minimum Wage Regulations 2015 set out that UK and international students enrolled at a higher or further education institution in the UK, who are required to undertake a mandatory work experience placement of up to one year as part of their course, are exempt from the entitlement to the National Minimum Wage. Students in further and higher institutions from outside of the UK are not included within this exemption. This means UK and international students are entitled to National Minimum Wage if the internship is part of their educational course based outside the UK.
22. The following section summarises the views gathered through the call for evidence on unpaid internships and internships paid below the National Minimum Wage. Responses are presented by stakeholder type.

Internships opportunities (summary of responses)

23. A total of 36 employers and businesses reported that they currently offer, or have previously offered, internship opportunities. Out of 93 employees and individuals, 11 respondents indicated that they are currently an intern, 51 had previously held internship positions, and 5 intend to pursue internships in the future.
24. The primary motivation for employees and individuals for undertaking or considering an internship was identified as using it as a pathway to paid employment. When asked about their duties or expectations, the roles most frequently cited were clerical and administrative and marketing and communications.

25. 24 employees and individuals reported that their internship lasted or is expected to last between one and three months, while 11 respondents indicated durations of three to six months.

Compensation (summary of responses)

26. 21 out of 34 employers and businesses indicated that their internships are or were, compensated positions. Furthermore, out of 22 respondents, 15 confirmed that interns are paid at least the National Minimum Wage.
27. 27 employees and individuals stated they were or expect to be paid during their internship. 11 out of 25 respondents were paid at least the National Minimum Wage, 11 respondents stated they were not paid the National Minimum Wage, and 3 did not know.
28. The most common reason given by employers for unpaid internships or internships paid below the National Minimum Wage was the internship being considered a voluntary position. These positions frequently involve observational or shadowing activities, rather than substantive work, which is used to justify the absence of financial compensation.

View on unpaid internships (summary of responses)

29. Most respondents (19 employers and businesses, 44 employees and individuals and 81 other stakeholders) agreed or strongly agreed that unpaid internships or internships paid below the National Minimum Wage should be banned if they are not related to an educational or training course.
30. Additionally, 25 employers and businesses stated that having a clear legal definition of 'intern' would be beneficial, indicating a desire for greater clarity in the regulation of internship arrangements.

4.2 Unpaid work trials

31. As part of a recruitment process, an individual may be asked by a prospective employer to carry out tasks, without payment, to help the employer to decide whether the individual has the skills and qualities required for the job. Often this will be a legitimate practice, but some employers may use unpaid trial work periods to obtain work or services for which at least the minimum wage should be paid.

32. Current legislation does not define a “trial work period” or state precisely when at least the minimum wage must be paid. However, government guidance is clear that where an employer asks an individual to carry out a ‘trial’, test’ or ‘recruitment exercise’, the individual may nevertheless be a ‘worker’ and entitled to the minimum wage.
33. Given the number of work trials and the potential for abuse, the government is keen to understand any potential issues with paid and unpaid work trials, including the scale of any issues, and the types of jobs and sectors affected by these issues.

Use of work trials (summary of responses)

34. Only a few employers and businesses offered paid work trials, 2 offered unpaid work trials (including work trials paid below the National Minimum Wage) and 1 offered both. 29 respondents stated they have taken part in a work trial, and 2 respondents intend to take part in the future.
35. Employees and individuals stated the most common reason for employers using work trials was to test the general suitability of candidates, followed by testing skills required for a specific role.

Compensations (summary of responses)

36. The majority of respondents across all stakeholder groups agreed or strongly agreed that individuals participating in work trials should be compensated at least the National Minimum Wage. Some respondents suggested that compensation such as travel or meal expenses would be fair.
37. The majority of employees and individuals (28 out of 32) stated they were not or did not expect to be paid during the work trial. Of the four respondents who received or expected to receive payment, 3 stated they were or expect to be paid the National Minimum Wage whereas one respondent did not know.

Views on work trials (summary of responses)

38. The most common length for a work trial reported by 33 employees and individuals was up to one day, followed by between 1 and 7 days. The majority of respondents agreed work trials should be limited in duration to up to one week (39 out of 98 other stakeholders).
39. In addition to limiting the duration of work trials, 31 employees and individuals and 4 out of 6 employers and businesses that responded agreed additional measures or safeguards should be introduced to protect individuals participating in work trials.

4.3 Voluntary work

40. The term 'voluntary worker' has a specific meaning for minimum wage purposes. They are workers and have an employment contract or a contract to personally perform work or provide services, which can be written, oral or implied. However, a voluntary worker generally does not qualify for the minimum wage.
41. As set out in the National Minimum Wage legislation, voluntary workers are a category of workers that work for: a charity, voluntary organisation, an associated fundraising body, or a statutory body.
42. Not every worker who works for one of these organisation's is automatically a voluntary worker for minimum wage purposes and thus exempt from the minimum wage. For someone to be classed as a voluntary worker they cannot be paid more than a reimbursement of expenses incurred or reasonably expected to be incurred. Also, they must not receive any benefit in kind other than reasonable subsistence or accommodation. If they are paid for the work they do or receive any such benefit in kind, the person is likely a worker and may be entitled to the minimum wage.
43. The circumstances where workers are required to be paid at least the National Minimum Wage is clear. We are unaware of any specific issues related to voluntary workers, but we want to ensure that all workers who are entitled to the National Minimum Wage receive it.
44. The following section summarises views gathered through the call for evidence on voluntary workers. Responses are presented by stakeholder type. Within each group, the analysis covers key themes as well as quantitative analysis.

Voluntary worker opportunities (summary of responses)

45. 8 employers and businesses have hired or plan to hire voluntary workers. 46 employees or individuals are or have been voluntary workers in the past. The most common roles for voluntary workers were clerical or administrative and marketing and communications.

Compensation (summary of responses)

46. 5 out of the 9 employers and businesses stated that the voluntary workers they engage receive some form of financial or nonfinancial compensation. The minority of employees or individuals (6 out of 45) stated they receive or expect to receive some form of compensation. The most common form of compensation were travel expenses and meal expenses.

47. Views from stakeholders on whether compensation should be mandatory was mixed. Half of employers and businesses, and almost half of employees and individuals (37 out of 71) and all other stakeholders (42 out of 97) agreed reimbursing all voluntary workers expenses should be mandatory.

View on voluntary workers (summary of responses)

48. The majority of respondents across all stakeholder groups believe organisations should be required to provide a clear written description of voluntary workers' roles and responsibilities.

4.4 Volunteers

49. Volunteers do not qualify for the minimum wage because they are not workers. They do not have any employment contract or contract to perform work or provide services. Typically, a volunteer can provide their time and effort completely freely, can come and go as they please, is under no obligations to provide services, cannot be made to perform specific duties, does not suffer any sanctions if they do not perform their duties, and some organisations may reimburse volunteers for reasonable expenses, such as travel costs and meals. Such reimbursements are not considered payment, so they do not affect the volunteers' status. Volunteers often perform tasks that resemble paid employment.
50. A person described as a volunteer may nevertheless be treated in law as a worker where the arrangements under which they provide their services amount, in substance, to a contract of employment or a contract to personally perform work or services. In those circumstances, the label applied by the organisation is not determinative, and entitlement to the National Minimum Wage will depend on the reality of the relationship.
51. A volunteer may be classed as a worker if they receive payment, reward, or benefit in kind. This includes any promise of a contract or paid work in the future. As a worker they would be entitled to the National Minimum Wage. Volunteers do not have a contract of employment or form of contract to perform work, and do not enjoy the same legal protections as paid employees. They are under no obligation to volunteer, and they provide their time and effort freely. This means that organisations cannot compel volunteers to perform certain duties, and they can choose whether they perform the duties asked of them, as well as when and how they perform these. Although some organisations use volunteer agreements, which set out expectations of the nature of the duties a volunteer is expected to perform and the location and hours of volunteering, this is not compulsory and is generally not legally enforceable.

52. The circumstances where workers are required to be paid at least the National Minimum Wage is clear. Volunteers do not qualify for the National Minimum Wage, and we are unaware of specific issues relating to volunteers.
53. The following section summarises views gathered through the call for evidence on volunteers. Responses are presented by stakeholder type, within each group, the analysis covers key themes as well as quantitative analysis.

Volunteering opportunities (summary of responses)

54. 17 employers and businesses stated their organisation currently engages volunteers or had done so in the past. 13 respondents stated they are currently volunteers, 29 had been volunteers in the past and 3 intend to become volunteers.
55. Employees and individuals stated that the most common volunteering roles they undertook were marketing or communications and clerical or administrative roles.

Compensation (summary of responses)

56. The responses related to compensation were mixed. Two thirds of employers and businesses who responded (12 out of 18) stated their volunteers did not receive compensation. This was aligned with the responses from employees and individuals where 39 out of 52 stated they did not receive or expect to receive compensation. The most common type of compensation was travel expenses.
57. Views on whether compensation should be mandatory was largely split across all respondent groups with an equal number of employers and businesses (7 respondents) disagreeing on whether compensation should be mandatory. 27 employees and individuals were in favour of mandatory compensation whereas 22 disagreed, and 45 all other stakeholders were in favour of mandatory compensation with 42 opposing.

Views on volunteering (summary of responses)

58. Views from respondents on defining the term 'volunteer' in law were mixed with half of employers and businesses and around two thirds of employees and individuals stated it should be defined in legislation.
59. The majority of respondents agreed that organisations should provide a clear, written description of volunteer roles and responsibilities.

4.5 Work shadowing

60. Work shadowing is not defined in legislation. An individual undertaking a placement that does not involve any work being performed, such as work shadowing, is not entitled to the National Minimum Wage. Genuine work shadowing involves observing others performing work (or observing other activities as agreed between the individual who is work shadowing and the organisation) but they should not perform work or tasks that contribute to the organisation's activities. If conducted correctly, work shadowing can be a valuable informal learning experience.
61. Individuals who are engaged in work shadowing are not workers for National Minimum Wage purposes and are therefore not entitled to the National Minimum Wage. An individual described as work shadowing may nonetheless be treated as a worker, where, in substance, they are required to perform duties, provide services of value to the organisation, or where the arrangements otherwise amount to a contract of employment or a contract to personally perform work or services. As in other contexts, the assessment depends on the reality of the arrangements rather than the label applied.
62. We are unaware of specific issues related to work shadowing, but we want to ensure that all workers who are entitled to the National Minimum Wage receive it.
63. The following section summarises the views gathered through the call for evidence on work shadowing. Responses are presented by stakeholder type. Within each group, the analysis covers key themes as well as quantitative analysis.

Work shadowing opportunities (summary of responses)

64. 16 respondents stated their organisation currently offers work shadowing opportunities or had done so in the past. Of the employees and individuals who responded, 1 stated they are currently work shadowing, 24 have work shadowed in the past, and 2 intend to participate in work shadowing in the future.
65. Employees and individuals reported that the most common duration for work shadowing was 1 to 7 days (19), followed by 8 to 13 days (3). 5 employers and businesses stated that these work shadowing opportunities lasted a maximum of 4 weeks.
66. Views on whether individuals were expected to perform tasks during work shadowing opportunities was mixed. Almost half of employees and individuals (15 out of 28) stated they were expected to perform some form of task. There was a range of activities for those work shadowing, including learning administrative tasks, observing daily tasks, and assisting with projects.

67. 7 of the 11 employers and businesses who provided a response believed there should be a maximum duration allowed for work shadowing, with the most suggesting a maximum duration of between 1 and 7 days, and between 1 and 3 months.

Compensation (summary of responses)

68. Respondent views on compensation were mixed. Under half (29 out of 62) of employees and individuals and under half (43 out of 97) of all other stakeholders stated there should be some form of compensation. The most common form of compensation suggested by respondents were for travel and meal expenses.

Views on work shadowing (summary of responses)

69. The majority of respondents agreed that organisations should provide clear written descriptions of roles and responsibilities, including 47 of 62 employees and individuals. Whilst the overall response rate from employers and business was low, the majority (6 out of 11) also agreed. There was support from employers and businesses and employees and individuals for defining work shadowing in legislation with 6 out of 10 employers and businesses and 40 out of 63 employees and individuals in favour.
70. The majority of stakeholders agreed work shadowing opportunities should be time limited. The most common response across all stakeholder groups was up to 1 week.

5. Conclusion and next steps

71. The legislation is clear that individuals who meet the definition of a worker are entitled to be paid at least the National Minimum Wage unless a statutory exemption applies. Unpaid internships which are not covered by the educational exemption in the National Minimum Wage legislation will be unlawful where the arrangements amount to a contract of employment or a contract to personally perform work or services. If an individual is a worker, employers cannot call them an intern to avoid paying them the correct rate they are legally entitled to. This government is committed to ensuring young people have a fair chance at the start of their careers which will set them on a path to success.
72. Overall, this call for evidence attracted a good number of responses from a diverse set of stakeholders, but for many topics or individual questions a low number of responses were received. Nevertheless, this call for evidence has generated valuable qualitative evidence, which has been considered alongside wider qualitative and quantitative evidence and given proportionate weight in our assessment.
73. Engagement with stakeholders highlighted that while many employers comply with the law, there remains some confusion about its application and a minority of employers fail to pay workers correctly. Stakeholders, such as the Chartered Institute of Personnel and Development (CIPD) emphasised that a number of their members agree that existing legislation, if properly understood and enforced, would protect most interns who have worker status. Employer and business groups, as well as other stakeholders, have also called on the government to do more to raise awareness of the law and employer responsibilities, particularly as some employers are engaging individuals as 'interns' but they are conflating this with other categories, which can cause confusion for workers and employers.

Internships

74. We will take **three key actions** to tackle these illegal unpaid internships.
75. **Firstly**, we will review and expand our guidance. The legislation is clear as to the circumstances where individuals undertaking internships may be unpaid and the circumstances where they must be paid at least the National Minimum Wage. But we have listened to feedback from stakeholders (employers and workers) who have told us that they are not always clear on how the law applies to them.
76. Stakeholders, including the TUC, have called on the government to amend the National Minimum Wage legislation and ensure this is backed by enforcement to better protect interns. We agree with stakeholders that interns need to be appropriately protected, and we are not therefore ruling out legislative change where

the evidence indicates that existing protections are insufficient. We are, however, mindful of the risks that employers might seek to find other ways to try and circumvent the law if the definition of an intern is tightly defined or lead to a two-tier system where interns are treated differently to workers.

77. The responses from employers and workers stated that one of the common reasons internships were unpaid was due to the internships being considered a voluntary role, or the individuals were observing others do work. We will take on board the responses from the call for evidence to further expand the National Minimum Wage guidance to make it even easier for workers and employers to understand the legislation, and to make it easier for workers to identify where they have been mistreated and the actions they can take to enforce their rights.
78. **Secondly**, we will continue to crack down on unscrupulous employers through existing enforcement channels and via the forthcoming Fair Work Agency. The UK's labour market enforcement system is currently fragmented. This is bad for workers and bad for those businesses being undercut by the minority who freely break the rules. The Fair Work Agency will deliver a much-needed upgrade to the enforcement of workers' rights. The Fair Work Agency will bring existing enforcement functions together into one place, so employment rights are enforced more effectively and efficiently. This will benefit individuals, such as interns, when they seek recourse if employers are not complying with the law. We need individuals, workers and responsible employers to report non-compliant employers so enforcement bodies can investigate them.
79. **Thirdly**, by bolstering existing communications campaigns from within and outside of government, we will help young people understand their rights and what action they can take if they are not paid what they are legally entitled to. Changing the legislation alone will not necessarily lead to individuals being aware of or understanding their rights. From the open responses, it was clear that some individuals were not aware of their rights or lacked confidence to challenge unfair practices. This, in turn, may contribute to some employers perceiving a low risk of challenge or enforcement when failing to pay young people at least the minimum wage. The Sutton Trust (in their report 'Unpaid and underpaid internships, access to internships for graduates', published in January 2025) specifically recommended the promotion of information on internships and the National Minimum Wage to employers and inform young people of their rights.
80. Many stakeholders have told us that young people, especially those early on in their careers, often accept unpaid roles as a stepping stone into paid employment and do not report employers because they are concerned about adverse consequences. This was reflected in some of the responses we received: "As a young person trying to break into fields in an ever crowded job market we are often left with no choice....",

“Thousands of students and under 25s across the UK feel it is ‘mandatory’...there is social pressure...”, and “... internships are viewed as a necessary stepping stone to getting a job...”. This contributes to inequality within society, with many respondents recognising free work impacting social mobility. Legislation alone cannot tackle this issue which appears to be particularly entrenched in certain sectors so we will use all tools at our disposal to tackle this issue.

Work trials

81. The number of responses on work trials was low, which limits the inferences which can be drawn. However, some of the responses and discussions with stakeholders suggest there are some employers who are not using work trials, paid and unpaid, as they are intended. Business representative organisations in their response stated additional guidance to help employers understand when the National Minimum Wage must apply would be helpful and Make UK highlighted that the current approach of considering work trials on a case-by-case basis is reasonable and a blanket approach could bring significant challenges.
82. Some stakeholders, such as the Institute of Directors, are clear in their views that work trials should only be used for genuine recruitment practices and should not be for extended periods in non-simulated environments where the employer gains substantial value from the labour. We agree. When used correctly, work trials can benefit workers and the employer so we do not want to restrict legitimate trials, but we will work to stamp out unfair practices through enforcement action. We will update the guidance on work trials and encourage individuals to report these where they may be being misused.

Voluntary work, volunteers, and work shadowing

83. Stakeholders from the volunteering sector, such as the National Council for Voluntary Organisations, highlighted that flexibility – both for the volunteer and the organisation they volunteer for – enables the volunteer to give their time freely and not be constrained by formal employment structures. They expressed concern that defining volunteering in law could undermine this flexibility and deter people from volunteering. Voluntary workers are already exempted from requiring to be paid the National Minimum Wage (NMW) where they meet the statutory definition and we do not propose to change the law on this. We will work with stakeholders to review the NMW guidance.
84. The limited responses on work shadowing opportunities suggest they are not commonly used, therefore at this stage we believe it would be disproportionate to introduce new legislation. Some respondents, such as The Chartered Institute of Payroll Professionals, recognise that some informal learning pathways can benefit

workers and employers and work shadowing is a good way for an individual to gain knowledge and experience. Equally, several respondents stated that they would like to see additional guidance and safeguards.

85. We do not propose to ban or limit these opportunities which allow individuals to freely contribute to their communities, causes that matter to them, give them opportunities to test a job or a workplace before they make a career change, or take on a new role. We will review government guidance and work with stakeholders to ensure voluntary workers, volunteers, and individuals who are work shadowing are doing so freely and in line with guidance and best practice. We will also work with stakeholders to raise awareness of the updated guidance.
86. We are confident that through the above steps and working closely with stakeholders we will stamp out these unfair work practices and protect workers and responsible employers. Whilst we are simplifying the employment landscape and do not want to introduce barriers to opportunities, we will consider further legislative options if these issues are not resolved.

Annex A: Number of responses by sector / industry

Sector / Industry	Number of responses
Accommodation & food services	7
Administrative & Support services	5
Construction	5
Education	114
Financial, insurance & real estate activities	6
Human health & Social work activities	22
Information & communication	6
Manufacturing	9
Professional, scientific & technical services	18
Public administration & defence; social security	4
Wholesale, retail & repair of motor vehicles	7
Do not know	19
Other services	97
Prefer not to say	17
Total	336

Annex B: Questions on unpaid internships

Employers and Businesses:

Question	Responses
Has your organisation hired or plans to hire interns?	Total responses received: 46 Number who responded 'yes': 36 Number who responded 'no': 9 Number who responded 'do not know': 1
Were or are interns at your organisation paid for their roles?	Total responses received: 34 Number who responded 'yes': 21 Number who responded 'no': 11 Number who responded 'do not know': 2
Were or are interns are your organisation paid at least the National Minimum Wage?	Total responses received: 22 Number who responded 'yes': 15 Number who responded 'do not know': 4 Number who responded 'no': 3
If your organisation pays interns below the National Minimum Wage, what is the reason for this?	Total responses received: 14 Number who responded 'other': 5 Number who responded 'Internship is considered voluntary position': 5 Number who responded 'Interns are engaged in purely observational or shadowing roles': 2 Number who responded 'Internship is part of an educational programme or course requirement': 1 Number who responded 'organisation was not aware that interns were entitled to receive at least National Minimum Wage': 1
Currently the term 'intern' is not defined in legislation. Would it be helpful to define interns within legislation?	Total responses received: 33 Number who responded 'yes': 25 Number who responded 'no': 5 Number who responded 'do not know': 3
Should learners from higher and further education institutions from outside of the UK continue to be entitled to the National Minimum Wage for the period they are on an education or training related internship or work experience placement?	Total responses received: 33 Number who responded 'yes': 18 Number who responded 'no': 8 Number who responded 'other': 4 Number who responded 'do not know': 3

Would removing the exemption affect your organisation?	Total responses received: 32 Number who responded 'no': 19 Number who responded 'yes': 8 Number who responded 'do not know' 5
To what extent do you agree or disagree with the following statement: Unpaid internships or internships which are paid below the National Minimum Wage should be banned if they are not related to an educational or training course.	Total responses received: 33 Number who responded 'strongly agree': 14 Number who responded 'agree': 5 Number who responded 'disagree': 5 Number who responded 'strongly disagree': 5 Number who responded 'neither agree nor disagree': 4
Are there any additional measures or safeguards you believe should be introduced to protect interns from potential exploitation?	Total responses received: 32 Number who responded 'yes': 18 Number who responded 'do not know' 8 Number who responded 'no' 6

Employees and Individuals:

Question	Responses
Are you an intern, or have you been one, or do you intend to be one?	Total responses received: 93 Number who responded 'I have been an intern in the past': 51 Number who responded 'Not applicable': 23 Number who responded 'I am an intern': 11 Number who responded 'I intend to become an intern': 5 Number who responded 'Do not know': 3
How long did your internship last? For respondents who have not commenced their internship, how long do you expect your internship to last?	Total responses received: 68 Number who responded 'between 1 and 3 months': 24 Number who responded 'between 3 and 6 months': 11 Number who responded 'between 2 and 4 weeks': 10 Number who responded 'between 9 months and 1 year': 7 Number who responded 'between 1 and 2 weeks': 4 Number who responded 'other': 4

	<p>Number who responded 'between 6 months and 9 months': 3</p> <p>Number who responded 'do not know': 2</p> <p>Number who responded 'up to 1 week': 2</p> <p>Number who responded 'over 1 year': 1</p>
Were you, or do you expect to be, paid during your time as an intern?	<p>Total responses received: 68</p> <p>Number who responded 'No': 36</p> <p>Number who responded 'yes': 27</p> <p>Number who responded 'do not know': 5</p>
Were you paid or will you be paid at least the National Minimum Wage?	<p>Total responses received: 25</p> <p>Number who responded 'yes': 11</p> <p>Number who responded 'no': 11</p> <p>Number who responded 'do not know': 3</p>
Would it be helpful to define interns within legislation?	<p>Total responses received: 58</p> <p>Number who responded 'yes': 49</p> <p>Number who responded 'do not know': 7</p> <p>Number who responded 'no': 2</p>
To what extent do you agree or disagree with the following statement: Unpaid internships or internships which are paid below the National Minimum Wage should be banned if they are not related to an educational or training course.	<p>Total responses received: 58</p> <p>Number who responded 'strongly agree': 36</p> <p>Number who responded 'agree': 8</p> <p>Number who responded 'disagree': 6</p> <p>Number who responded 'neither agree nor disagree': 3</p> <p>Number who responded 'strongly disagree': 3</p>
Are there any additional measures or safeguards you believe should be introduced to protect interns from potential exploitation?	<p>Total responses received: 58</p> <p>Number who responded 'yes': 40</p> <p>Number who responded 'do not know': 16</p> <p>Number who responded 'no': 2</p>

All other stakeholders:

Questions	Responses
To what extent do you agree or disagree with the following statement: Unpaid internships or internships which are paid below the National Minimum Wage should be banned if they are not related to an educational or training course.	<p>Total responses received: 111</p> <p>Number who responded 'strongly agree': 54</p> <p>Number who responded 'agree': 27</p> <p>Number who responded 'disagree': 12</p> <p>Number who responded 'strongly disagree': 9</p>

	<p>Number who responded 'neither agree nor disagree': 6</p> <p>Number who responded 'do not know': 3</p>
<p>How long should internships which are not part of an educational or training course last?</p>	<p>Total responses received: 107</p> <p>Number who responded 'between 2 and 4 weeks': 22</p> <p>Number who responded 'other': 22</p> <p>Number who responded 'between 1 and 3 months': 15</p> <p>Number who responded 'between 1 and 2 weeks': 14</p> <p>Number who responded 'between 3 and 6 months': 10</p> <p>Number who responded 'do not know': 9</p> <p>Number who responded 'up to 1 week': 8</p> <p>Number who responded 'between 9 months and 1 year': 4</p> <p>Number who responded 'over 1 year': 2</p> <p>Number who responded 'between 6 months and 9 months': 1</p>

Annex C: Questions on work trials

Employers and businesses:

Questions	Responses
If your organisation offers work trials, are these work trials paid or unpaid?	Total responses received: 32 Number who responded 'does not offer work trials': 26 Number who responded 'Paid work trials': 3 Number who responded 'unpaid work trials': 2 Number who responded 'both': 1
Would banning unpaid work trials affect the likelihood of your organisation offering employment?	Total responses received: 7 Number who responded 'no': 3 Number who responded 'yes': 2 Number who responded 'do not know': 2
To what extent do you agree or disagree with the following statement: Individuals participating in work trials should be compensated at least the National Minimum Wage.	Total responses received: 6 Number who responded 'strongly agree': 5 Number who responded 'strongly disagree': 1
Would banning unpaid work trials affect the way your organisation conducts work trials?	Total responses received: 6 Number who responded 'yes': 3 Number who responded 'no': 3
Are there any additional measures or safeguards your organisation believes should be introduced to protect individuals participating in work trials?	Total responses received: 6 Number who responded 'yes': 4 Number who responded 'no': 1 Number who responded 'do not know': 1

Employees and Individuals:

Questions	Responses
Have you ever participated in, or do you plan to participate in, a work trial?	Total responses received: 79 Number who responded 'not applicable': 45 Number who responded 'I have taken part in a work trial': 29 Number who responded 'do not know': 3 Number who responded 'I intend to take part in a work trial': 2

Did the organisation who offered the work trial have guidance or processes in place?	Total responses received: 34 Number who responded 'no': 24 Number who responded 'do not know': 6 Number who responded 'yes': 3 Number who responded 'other': 1
If you have, are or will be taking part in a work trial how long do you expect this to last?	Total responses received: 33 Number who responded 'up to 1 day': 20 Number who responded 'between 1 and 7 days': 6 Number who responded 'between 1 and 2 weeks': 3 Number who responded 'do not know': 3 Number who responded 'between 3 and 6 months': 1
For the work trial you took part in, are currently taking part in, or plan to take part in, did you receive or do you expect to receive payment?	Total responses received: 32 Number who responded 'no': 28 Number who responded 'yes': 3 Number who responded 'do not know': 1
For the work trial you took part in, are currently taking part in, or plan to take part in, were you or do you expect to be paid at least the National Minimum Wage?	Total responses received: 4 Number who responded 'yes': 3 Number who responded 'do not know': 1
Do you think individuals participating in work trials should be compensated at least the National Minimum Wage?	Total responses received: 31 Number who responded 'yes': 27 Number who responded 'no': 2 Number who responded 'do not know': 2
Would banning unpaid work trials affect the likelihood of you being offered employment?	Total responses received: 77 Number who responded 'no': 42 Number who responded 'do not know': 17 Number who responded 'yes': 13 Number who responded 'other': 5
Are there any additional measures or safeguards you believe should be introduced to protect individuals participating in work trials?	Total responses received: 71 Number who responded 'yes': 31 Number who responded 'do not know': 28 Number who responded 'no': 12

All other stakeholders:

Questions	Responses
Do you believe all work trials should be compensated?	Total responses received: 102 Number who responded 'yes': 87 Number who responded 'no': 13 Number who responded 'do not know': 2

How long should work trials last?	Total responses received: 98 Number who responded 'up to 1 week': 39 Number who responded 'between 2 and 4 weeks': 18 Number who responded 'other': 14 Number who responded 'between 1 and 2 weeks': 13 Number who responded 'do not know': 6 Number who responded 'between 1 and 3 months': 4 Number who responded 'between 3 and 6 months': 2 Number who responded 'between 6 and 9 months': 2
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Annex D: Questions on voluntary workers

Employers and businesses

Questions	Responses
Has your organisation hired or plans to hire voluntary workers?	Total responses received: 34 Number who responded 'no': 23 Number who responded 'yes': 8 Number who responded 'do not know': 3
Should organisations be required to provide a clear, written description of voluntary workers roles and responsibilities?	Total responses received: 10 Number who responded 'yes': 9 Number who responded 'other': 1
Do voluntary workers receive any form of financial or non financial compensation?	Total responses received: 10 Number who responded 'yes': 9 Number who responded 'other': 1
Should reimbursing all voluntary workers expenses (e.g., travel, meals) be mandatory?	Total responses received: 10 Number who responded 'yes': 5 Number who responded 'no': 4 Number who responded 'do not know': 1

Employees and Individuals

Questions	Responses
Have you ever been involved in voluntary work?	Total responses received: 73 Number who responded 'I have been a voluntary worker in the past': 34 Number who responded 'not applicable': 27 Number who responded 'I am a voluntary worker': 12
Did you receive, are you receiving, or do you expect to receive any compensation?	Total responses received: 45 Number who responded 'no': 39 Number who responded 'yes': 6
Do you think that reimbursing all voluntary workers expenses (e.g., travel, meals) be mandatory?	Total responses received: 71 Number who responded 'yes': 37 Number who responded 'no': 18 Number who responded 'unsure': 11 Number who responded 'do not know': 3 Number who responded 'other': 2
Do you think that organisations should be required to provide a clear, written	Total responses received: 72 Number who responded 'yes': 63

description of voluntary workers roles and responsibilities?	Number who responded 'no': 5 Number who responded 'do not know': 4
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All other stakeholders

Questions	Responses
Do you believe all voluntary workers should be compensated?	Total responses received: 97 Number who responded 'no': 47 Number who responded 'yes': 42 Number who responded 'do not know': 8

Annex E: Questions on volunteers:

Employers and Businesses:

Question	Responses
Does your organisation currently engage volunteers, or has it done so in the past?	Total responses received: 33 Number who responded 'yes': 17 Number who responded 'no': 16
If your organisation engages volunteers, do they receive any compensation?	Total responses received: 18 Number who responded 'no': 12 Number who responded 'yes': 5 Number who responded 'do not know': 1
Should reimbursing all volunteer expenses (e.g., travel, meals) be mandatory?	Total responses received: 18 Number who responded 'yes': 7 Number who responded 'no': 7 Number who responded 'do not know': 2 Number who responded 'other': 2
There is no single statutory definition of volunteer. Should this be introduced in legislation?	Total responses received: 18 Number who responded 'yes': 9 Number who responded 'no': 5 Number who responded 'do not know': 4
Should organisations be required to provide a clear, written description of volunteer roles and responsibilities?	Total responses received: 18 Number who responded 'yes': 13 Number who responded 'no': 3 Number who responded 'do not know': 1 Number who responded 'other': 1

Employees and Individuals:

Questions	Responses
Did you, do you, or will you receive any compensation as a volunteer?	Total responses received: 52 Number who responded 'no': 39 Number who responded 'yes': 10 Number who responded 'other': 2 Number who responded 'do not know': 1
There is no single statutory definition of volunteer. Should this be introduced in legislation?	Total responses received: 65 Number who responded 'yes': 43 Number who responded 'do not know': 13 Number who responded 'no': 9
Do you think that reimbursing all volunteer expenses (e.g., travel, meals) should be mandatory?	Total responses received: 67 Number who responded 'yes': 27 Number who responded 'no': 22

	Number who responded 'do not know': 14 Number who responded 'other': 4
Do you think organisations should be required to provide a clear, written description of volunteer roles and responsibilities?	Total responses received: 68 Number who responded 'yes': 58 Number who responded 'no': 5 Number who responded 'do not know': 5

All other stakeholders:

Questions	Responses
Do you believe all volunteers should be compensated?	Total response received: 94 Number who responded 'yes': 45 Number who responded 'no': 42 Number who responded 'do not know': 7

Annex F: Questions on work shadowing:

Employers and businesses:

Questions	Responses
Does your organisation currently offer work shadowing opportunities, or has it done so in the past?	Total responses received: 34 Number who responded 'yes': 16 Number who responded 'no': 15 Number who responded 'do not know': 3
Does your organisation ensure that individuals who are work shadowing are limited to only observing others perform work or tasks?	Total responses received: 9 Number who responded 'do not know': 4 Number who responded 'no': 3 Number who responded 'yes': 1 Number who responded 'other': 1
Work shadowing is currently not defined in legislation. Should work shadowing be defined in legislation?	Total responses received: 10 Number who responded 'yes': 6 Number who responded 'no': 2 Number who responded 'do not know': 2
Should organisations be required to provide a clear, written description of the roles and responsibilities for work shadowing?	Total responses received: 11 Number who responded 'yes': 6 Number who responded 'no': 3 Number who responded 'do not know': 2
Should there be a maximum duration allowed for work shadowing?	Total responses received: 11 Number who responded 'yes': 7 Number who responded 'no': 2 Number who responded 'do not know': 2
What should be the maximum duration?	Total responses received: 10 Number who responded 'between 1 day and 7 days': 3 Number who responded 'between 1 and 3 months': 2 Number who responded 'do not know': 2 Number who responded 'between 1 and 2 weeks': 1 Number who responded 'between 2 and 4 weeks': 1 Number who responded 'between 6 months and 9 months': 1

Employees and Individuals:

Questions	Responses
Have you been involved in, are you currently involved, or do you plan to get involved in work shadowing?	Total responses received: 65 Number who responded 'not applicable': 36 Number who responded 'I have work shadowed in the past': 24 Number who responded 'I intend to participate in work shadowing in the future': 2 Number who responded 'do not know': 2 Number who responded 'I am currently work shadowing': 1
How long did your work shadowing last, how long is it currently lasting, or how long do you plan for it to last?	Total responses received: 29 Number who responded '1 - 7 Days': 19 Number who responded '8 - 13 Days': 3 Number who responded 'do not know': 3 Number who responded '2 weeks or longer': 2 Number who responded 'other': 2
When you were work shadowing, did you or do you expect to receive payment?	Total responses received: 30 Number who responded 'no': 23 Number who responded 'yes': 5 Number who responded 'do not know': 2
Was the payment you received at least the National Minimum Wage?	Total responses received: 6 Number who responded 'do not know': 3 Number who responded 'no': 2 Number who responded 'yes': 1
When you were work shadowing did you or were you expected to perform any tasks?	Total responses received: 28 Number who responded 'yes': 15 Number who responded 'no': 9 Number who responded 'do not know': 4
Work shadowing is currently not defined in legislation. Should work shadowing be defined in legislation to ensure clarity and consistent	Total responses received: 63 Number who responded 'yes': 40 Number who responded 'do not know': 14 Number who responded 'no': 9
Do you think individuals participating in work shadowing be reimbursed for reasonable expenses such as travel and meals?	Total responses received: 62 Number who responded 'yes': 29 Number who responded 'no': 17 Number who responded 'do not know': 13 Number who responded 'other': 3
Do you think there should be a maximum duration for work shadowing?	Total responses received: 62 Number who responded 'yes': 44

	<p>Number who responded 'do not know': 12</p> <p>Number who responded 'no': 6</p>
<p>What should be the maximum duration allowed for work shadowing?</p>	<p>Total responses received: '56'</p> <p>Number who responded 'between 2 and 7 days': 24</p> <p>Number who responded 'between 8 - 13 days': 12</p> <p>Number who responded 'do not know': 10</p> <p>Number who responded '2 weeks or longer': 7</p> <p>Number who responded 'up to 1 day': 2</p> <p>Number who responded 'other': 1</p>
<p>Do you think employers should be required to provide a written agreement outlining the expectations of the work shadowing arrangement?</p>	<p>Total responses received: 62</p> <p>Number who responded 'yes': 47</p> <p>Number who responded 'do not know': 10</p> <p>Number who responded 'no': 5</p>

All other stakeholders:

Questions	Responses
<p>Do you believe all work shadowing opportunities should be compensated?</p>	<p>Total responses received: 97</p> <p>Number who responded 'no': 46</p> <p>Number who responded 'yes': 43</p> <p>Number who responded 'do not know': 8</p>
<p>How long should work shadowing opportunities last?</p>	<p>Total responses received: 94</p> <p>Number who responded 'up to 1 week': 35</p> <p>Number who responded 'between 1 and 2 weeks': 31</p> <p>Number who responded 'between 2 and 4 weeks': 14</p> <p>Number who responded 'other': 9</p> <p>Number who responded 'do not know': 5</p>

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