

The Enrolment Gap

Automatic enrolment, multiple jobs and the cultural workforce

SERIES	ISSUE	PUBLISHED	PUBLISHER
Policy Briefings	No. 3	5 July 2026	Culture Meets Capital
EISSN	EVIDENCE CUT-OFF		
Forthcoming	5 July 2026		

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Executive summary

Automatic enrolment is a major UK pension reform. In Great Britain in 2024, 82 per cent of all employees were saving into a workplace pension; among employees meeting the statutory eligibility criteria, participation was 89 per cent. The default mechanism is effective.¹

Its reach is nevertheless bounded by rules designed around an individual employment. In 2026/27, a worker aged at least 22 and under State Pension age is ordinarily eligible for automatic enrolment only when earnings exceed £10,000 in a single job. A worker combining several part-time roles may therefore earn well above £10,000 in total and still fall below the trigger at every employer.²

The second Pensions Commission has now identified this as a structural barrier. Its May 2026 interim report records more than 1.3 million people with multiple jobs in March 2024 and concludes that hundreds of thousands may be missing out because their combined earnings exceed the trigger while no individual job does. That national finding gives the cultural sector a clear evidence window. It does not, however, prove the scale of exclusion within arts charities. That figure is not currently available.³

The central recommendation is therefore dual: the Commission should test workable routes to worker-level treatment of multiple earnings, and cultural organisations should supply the sector evidence needed to shape that work. The immediate deadline is 11:59 pm on 14 July 2026; the Commission expects to publish its final report in spring 2027.⁴

KEY FINDINGS

- **Automatic enrolment succeeds when the default applies.** Participation is 89 per cent among eligible employees in Great Britain. The Commission reports 37 per cent participation among employees earning below £10,000, compared with 71 per cent among those earning £10,000–£20,000. The comparison is drawn from the same Commission analysis and shows a marked participation gap below the trigger.^{1,5}
- **The trigger is applied job by job.** The Commission now accepts that this can exclude multi-job holders whose combined pay exceeds £10,000.³
- **Culture is a useful case sector, not a quantified exception.** Census 2021 analysis shows self-employment at 59 per cent in arts, culture and heritage occupations, indicating unusually non-standard work. It does not measure multiple employment within arts charities.
- **Removing the Lower Earnings Limit would deepen contributions, not by itself close the enrolment gap.** The £6,240 limit affects how much is contributed once a person participates; the £10,000 trigger determines whether automatic enrolment applies.
- **Pot consolidation and pensions dashboards address fragmentation after saving begins.** They do not create employer contributions where a worker is never enrolled.
- **The evidence window is immediate.** Arts employers, unions and sector bodies should submit data to the Pensions Commission before 14 July 2026.⁴

IMMEDIATE ACTION · SUBMIT SECTOR EVIDENCE BEFORE 11:59 PM ON TUESDAY 14 JULY 2026

The Commission is explicitly inviting evidence from employers, charities, third-sector organisations, trade unions and citizens. Submit through the GOV.UK online form or by email to views.pensions2050@dpw.gov.uk. A short, disciplined submission now is more valuable than a larger report after the window has closed.⁴

01

A successful reform with a remaining participation gap

Automatic enrolment changed pension participation by changing the default. Before implementation, workplace saving had been declining; after duties began in 2012, participation rose sharply, including among younger workers, lower earners and employees of small firms. In Great Britain in 2024, 23.3 million employees were saving into a workplace pension, equal to 82 per cent of all employees. Among eligible employees, 21.7 million were saving, equal to 89 per cent.¹

The statutory architecture in Great Britain for 2026/27 remains unchanged. The annual earnings trigger is £10,000; minimum contributions under the statutory qualifying-earnings basis are calculated using a lower limit of £6,240 and an upper limit of £50,270. The familiar minimum is 8 per cent of qualifying earnings in total, of which at least 3 per cent is paid by the employer. Qualifying schemes may instead use certified alternative contribution bases or more generous terms.²

Category	Simplified annual test	Core right
Eligible jobholder	Aged 22 to under State Pension age; earnings above £10,000 in a job	Automatically enrolled; minimum employer contribution required
Non-eligible jobholder	Aged 16–74 and earns above £6,240 but not more than £10,000, or earns above £10,000 outside the core age band	Can opt in; employer contribution is then required
Entitled worker	Aged 16–74; earnings at or below £6,240	Can ask to join a pension; employer contribution is not legally required

Table 1. Simplified automatic-enrolment categories. Actual assessment is made by pay reference period and individual circumstances; see *The Pensions Regulator guidance*.⁶

These categories matter because “not automatically enrolled” does not always mean “no right to a pension”. A non-eligible jobholder can opt in and require the employer to contribute. An entitled worker can join, but the employer need not contribute. The policy problem is behavioural as well as legal: a person must notice the right, understand it and act, while automatic enrolment was designed precisely to overcome that inertia.

The blind spot is not that the law ignores every low-paid worker. It is that the default disappears at the point where a portfolio worker may need it most.

02

The multiple-job problem

The unit of assessment is the individual job, while the unit of economic life is the worker. The Commission describes this plainly: when total income exceeds the trigger but the rules apply separately to each employer, multi-job holders can fall below the threshold in every role. It records more than 1.3 million people with multiple jobs in March 2024 and estimates that hundreds of thousands may be missing out on automatic enrolment for this reason.³

An illustrative cultural portfolio

Assume a musician is paid monthly and receives £600 a month from a county music service, £550 from a youth-orchestra charity and £350 from an arts centre programme: £18,000 a year in total. Each job remains below the monthly automatic-enrolment trigger of £833. The first two roles are above the monthly Lower Earnings Limit of £520 and ordinarily confer a right to opt in with employer contributions; the third ordinarily confers a right to join without a mandatory employer contribution. Exact treatment depends on pay reference periods, age and worker status, but the structural result is clear: no default applies anywhere.

This is not employer non-compliance. Each employer may be applying the rules correctly. It is a design gap created by the interaction of multiple correct assessments.

Why communication is not an equivalent substitute

Employers must write to workers who are not being automatically enrolled, explain their right to opt in or join and normally provide the information within six weeks of the relevant trigger.⁷ Good communication improves take-up, but an opt-in notice cannot reproduce the behavioural force of a default. The Commission reports participation of 37 per cent among employees earning below £10,000 and 71 per cent among those earning £10,000–£20,000. This comparison uses a common analytical basis and shows materially lower participation below the trigger.⁵

The distributional question

Historical government analysis identifies a particular exposure for lower earners, predominantly women, who combine several part-time jobs. The 2017 review counted 975,000 multi-job holders aged 22 to State Pension age, including 632,000 women. Those figures describe the composition of the multi-job population, not the number excluded from automatic enrolment. Current evidence supports a distributional concern, but does not provide a current sex-disaggregated estimate of exclusion.⁸

03

Why culture is a useful case sector — and what the evidence cannot yet prove

The strongest case for cultural-sector attention is structural. Creative PEC analysis of Census 2021 finds that self-employed people make up 31.5 per cent of the creative-occupation workforce in England and Wales, against 16.8 per cent across all occupations; in arts, culture and heritage occupations the share is 59 per cent. That is compelling evidence of a labour market organised unusually often around non-standard work.⁹

It is not, however, a direct estimate of the arts-charity workforce. It describes occupations, includes people working outside charities, and measures self-employment rather than the number of employees holding several jobs. Self-employed people sit outside employer automatic enrolment altogether. Their acute pension gap is adjacent to this paper, but analytically distinct.

Arts Council England's Cultural Freelancers Study adds direct evidence of mixed-status portfolio working: 29 per cent of current freelancer respondents combined freelance work with salaried work. This supports the relevance of mixed-income careers in the sector, but it does not measure the incidence of several sub-threshold PAYE jobs or the resulting automatic-enrolment exclusion.¹⁰

Status	What the evidence supports	What it does not support
Established	Cultural occupations have unusually high self-employment and non-standard work	A quantified arts-charity auto-enrolment exclusion rate
Established	The per-job trigger can exclude multi-job workers nationally	How many cultural workers are affected
Reasonable inference	Sessional and portfolio patterns are likely to increase exposure	That culture is uniquely or most severely affected
Evidence gap	Sector data should be collected now	A precise fiscal cost of reform for arts employers

Table 2. Evidence discipline for the cultural-sector case.

The appropriate institutional claim is therefore restrained: culture is a useful case sector through which to test the effect of multiple jobs, but the public record is too thin to estimate the sectoral scale. This is precisely why a sector submission matters.

04

Four problems that require different remedies

Debate frequently treats the £10,000 trigger, the £6,240 Lower Earnings Limit, small pots and self-employment as one “pension gap”. They are related, but they do different work and require different interventions.

Problem	Mechanism	Who is affected	Primary remedy
Participation	£10,000 trigger is tested per job	Workers below the trigger in every role	Change trigger design or create a worker-level route
Contribution depth	First £6,240 excluded from minimum contribution calculation	People already enrolled or opting in	Reduce or remove the Lower Earnings Limit
Fragmentation	Frequent job changes create small deferred pots	People who have already saved	Dashboards and automatic consolidation
Coverage	Self-employed people have no employer duty or default	People relying on self-employed income	A separate self-employed pension policy

Table 3. Four distinct gaps in pension coverage and adequacy.

The Lower Earnings Limit

The Pensions (Extension of Automatic Enrolment) Act 2023 gives the Secretary of State powers, after consultation, to lower the enrolment age and reduce or repeal the Lower Earnings Limit in Great Britain so that contributions can be calculated from the first pound. Northern Ireland enacted parallel regulation-making powers in 2025. The Commission estimates that removing the limit would increase contributions for around six million people.^{11,12}

This is important, but it does not solve the multi-job participation problem. A worker earning £7,000 in each of two jobs would still be below the £10,000 trigger at both employers unless the trigger itself or the route into saving changes. Removing the limit raises contribution depth after participation begins.

Fragmented pots

The Pension Schemes Act 2026 provides the enabling framework for automatic consolidation of small dormant workplace pension pots of £1,000 or less. Detailed transfer duties require secondary legislation; the government’s indicative roadmap places the point at which small-pot transfer duties come into force in 2031. Separately, schemes in scope of pensions dashboards must connect by 31 October 2026 before a later public launch. These reforms will make accumulated savings easier to find and manage. They do not supply missing contributions for periods in which a worker was never enrolled.^{13,14}

Policy design for workers with several jobs

A worker-level solution is conceptually attractive and operationally difficult. HMRC already receives Real Time Information from employers, but tax aggregation does not automatically answer the pension questions: when should eligibility be triggered; which employer should contribute; how should costs be allocated; what happens after payroll corrections; and how much information about other jobs should an employer receive?

The Commission should therefore commission an options appraisal rather than assume that a single mechanism is self-evidently superior.

Option	Potential advantage	Principal risk	Required evidence
Lower the trigger	Simple; uses existing payroll architecture	Affordability, opt-outs and employer cost; may still miss very small roles	Distributional modelling by household income and gender
Aggregate earnings through HMRC RTI	Aligns eligibility more closely with total earnings	Allocation, timing, corrections, privacy and cross-employer complexity	Technical feasibility and costed operating model
Worker-level multi-job election	Preserves choice while unlocking contributions across roles	Retains an active step and may have low take-up	Behavioural testing and clear allocation rules
Contractual enrolment by employers	Available now; can include first-pound contributions	Voluntary and uneven; hardest for small organisations	Employer practice, cost and opt-out evidence

Table 4. Illustrative options for closing the multi-job participation gap. These are appraisal routes, not settled recommendations.

Any reform should be assessed against four tests: the net retirement gain to lower earners; the effect on take-home pay and opt-out rates; the cost and administrative burden for small employers; and the distribution of gains by sex, age, disability, ethnicity, household income, working pattern, and nation or region. Cultural organisations can contribute evidence to all four, but should not be expected to absorb unmodelled costs without corresponding treatment in grant funding and eligible-cost rules.

06 What cultural organisations can do now

Meet the existing duties precisely

Any arts charity employing staff must identify who is a worker for automatic-enrolment purposes, assess the workforce, enrol eligible jobholders, communicate rights to those not enrolled and complete the required declarations. Sessional or project-based labels do not settle legal status; the reality of the relationship matters. Employers must also re-enrol certain eligible staff who previously left or reduced contributions on the three-year cycle and complete a re-declaration of compliance.¹⁵

The Pensions Regulator can issue a £400 fixed penalty and escalating penalties of £50 to £10,000 per day for continued non-compliance, depending on workforce size. The policy argument in this Briefing is not an excuse for weak compliance with the framework that already exists.¹⁶

Use voluntary design deliberately

Employers may contractually enrol a wider group, calculate contributions from the first pound of earnings or improve matching above statutory minima. Where finances permit, these choices align the pension scheme with the actual workforce rather than the minimum legal boundary. Where finances do not permit, boards should record the constraint and make it visible to funders.

Make the opt-in route usable

A compliant statutory notice is a floor. Cultural employers should explain, in plain language, who may opt in, what the employer will contribute, how to submit the notice and where to obtain impartial guidance. Communications should avoid implying that workers below £10,000 are "not eligible for a pension"; that is often legally inaccurate.

Submit evidence, not anecdotes

A useful sector submission would report, in aggregate: the number of workers by earnings band; the number automatically enrolled, opted in and merely entitled to join; the proportion on part-time, fixed-term or sessional contracts; any known prevalence of multiple jobs collected through an anonymous and voluntary survey; employer pension costs; and the effect of different funding models. Personal data should be minimised and no employer needs to identify individual workers to make the structural case.

EVIDENCE STANDARD · A MINIMUM VIABLE EVIDENCE SUBMISSION

One page of workforce numbers, one anonymised worker pathway, one estimate of employer cost, and one clearly framed policy question.

The Commission already understands the national mechanism; the cultural sector's task is to show its incidence and practical consequences.

07

Recommended policy actions

01 Pensions Commission

Include a dedicated recommendation on multi-job holders in the spring 2027 final report and commission a costed appraisal of lower-trigger, aggregate-earnings and worker-election models.

02 DWP, HMRC and The Pensions Regulator

Develop the administrative and data architecture for any worker-level route, including allocation of employer contributions, payroll corrections, privacy safeguards and a small-employer burden assessment.

03 Secretary of State for Work and Pensions

Consult on exercising the 2023 Act powers to reduce or remove the Lower Earnings Limit. Present this accurately as a contribution-depth reform, not a complete answer to per-job exclusion.

04 DCMS, Arts Council England, devolved administrations and national arts councils

Develop a proportionate evidence module on pension participation, multiple jobs and employer provision. Arts Council England should pilot it through a commissioned National Portfolio Organisation sample, with equivalent routes tested by devolved counterparts.

05 Arts employers and funders

Review worker classification, enrolment communications and voluntary scheme design. Funders should treat pension provision as a core employment cost.

06 Representative bodies and unions

Submit a consolidated response to the Pensions Commission by 14 July 2026, preserving the distinction between workers with several jobs and self-employed people outside automatic enrolment.

Automatic enrolment's success rests on a simple institutional insight: defaults change behaviour. The multiple-job gap is where that default currently falls away. Closing it will require careful design, not rhetorical simplicity. The cultural workforce provides a useful test because portfolio working is already established there; it also exposes the limits of the present evidence base. The immediate task is to make the sector visible before the 14 July 2026 deadline without claiming more than the evidence can support.

08

Methodology and limitations

This Briefing is a desk-based policy analysis using official statistics, legislation, regulatory guidance and independent sector research available to 5 July 2026. Sources were prioritised in the following order: legislation and government publications; The Pensions Regulator; official statistics; and established sector evidence. The central pension figures and deadlines were checked against current primary sources.

Territorial scope. The detailed statutory analysis concerns Great Britain. Northern Ireland has separate but parallel automatic-enrolment legislation, including the Pensions (Extension of Automatic Enrolment) Act (Northern Ireland) 2025. UK-wide cultural evidence and recommendations should therefore be coordinated across the two legal frameworks.

Data currency. DWP announced on 2 July 2026 that the 2009–2025 workplace pension participation series is provisionally due on 30 July 2026. The 2024 figures remain the latest available at this Briefing's evidence cut-off. CMC will review the digital edition when the new series is released.¹⁷

The paper does not present new survey data. It does not estimate how many arts-charity workers are excluded by the per-job trigger, because no robust published estimate was identified. Creative PEC's 59 per cent figure concerns self-employment in arts, culture and heritage occupations in England and Wales; Arts Council England's 29 per cent figure concerns freelancers combining freelance and salaried work. Both are used as evidence of non-standard workforce structure, not as proxies for employees holding several sub-threshold jobs. Illustrative earnings examples explain the mechanism and are not estimates of a typical cultural worker.

This is a policy briefing, not legal, tax, pension, or financial advice. Employers should use current regulatory guidance and obtain professional advice where worker status or pension duties are uncertain.

09

Notes and sources

1. Department for Work and Pensions, *Workplace pension participation and savings trends of eligible employees: 2009 to 2024* (31 July 2025). Reports 82% participation among all employees in Great Britain (23.3 million) and 89% among eligible employees (21.7 million). [Source](#)
2. The Pensions Regulator, *Earnings thresholds, 2026/27*. £10,000 automatic-enrolment trigger; £6,240 lower and £50,270 upper qualifying-earnings limits. [Source](#)
3. Second Pensions Commission, *Pensions 2050: Evidence and Future Priorities* (interim report, 19 May 2026). Paragraphs 4.35–4.36 record more than 1.3 million people with multiple jobs in March 2024 and conclude that hundreds of thousands may be missing out where combined earnings exceed £10,000 but no individual job does. [Source](#)
4. Second Pensions Commission, *Pensions 2050: evidence and future priorities – interim report*. Views are invited until 11:59 pm on Tuesday 14 July 2026; the final report is planned for spring 2027. Submissions may be made through the online form or to views.pensions2050@dwp.gov.uk. [Source](#)
5. Second Pensions Commission, *Pensions 2050: Evidence and Future Priorities* (interim report, paras 4.10–4.11). Reports 37% workplace-pension participation among employees earning below £10,000 and 71% among those earning £10,000–£20,000. [Source](#)
6. The Pensions Regulator, *Opting in, joining and contractual enrolment*. Non-eligible jobholders may opt in and receive employer contributions; entitled workers may join without a statutory employer-contribution duty. [Source](#)
7. The Pensions Regulator, *Information to workers: the workplace pension duties*. Employers must provide information on opt-in or joining rights within the applicable six-week period. [Source](#)
8. Department for Work and Pensions, *Automatic Enrolment Review 2017: Maintaining the Momentum*. The review identified 975,000 multi-job holders aged 22 to State Pension age, including 632,000 women. This describes the composition of the multi-job population, not the number excluded from automatic enrolment. [Source](#)
9. Creative Industries Policy and Evidence Centre, *Creative self-employed workforce in England and Wales* (17 March 2025). Census 2021 analysis: 31.5% of creative occupations and 59% of arts, culture and heritage occupations are self-employed, against 16.8% across all occupations. [Source](#)
10. Arts Council England, *Cultural Freelancers Study 2024* (2024). Among current freelancer respondents, 69% worked only or mainly as a freelancer and 29% combined freelance work with salaried work. The study does not measure several sub-threshold PAYE jobs or automatic-enrolment exclusion. [Source](#)
11. UK Parliament and Northern Ireland Assembly, *Pensions (Extension of Automatic Enrolment) Act 2023 and Pensions (Extension of Automatic Enrolment) Act (Northern Ireland) 2025*. The Acts provide regulation-making powers to lower the age threshold and reduce or repeal the Lower Earnings Limit in their respective jurisdictions. [Source](#) · [Northern Ireland Act](#)
12. Second Pensions Commission, *Pensions 2050: Evidence and Future Priorities* (interim report, paras 3.53–3.55). Estimates that removing the Lower Earnings Limit would increase contributions for around six million people. [Source](#)
13. UK Parliament and Department for Work and Pensions, *Pension Schemes Act 2026, Part 2; Workplace pensions: a roadmap* (Royal Assent 29 April 2026). The Act enables consolidation of qualifying small dormant DC pots. Detailed duties require secondary legislation; the Government's indicative roadmap places small-pot transfer duties coming into force in 2031. [Source](#) · [Act](#)
14. The Pensions Regulator, *When your scheme needs to connect with dashboards*. All schemes in scope must connect by 31 October 2026; public availability follows a separate readiness process. [Source](#)
15. The Pensions Regulator, *Re-enrolment and re-declaration*. Certain eligible staff who left or reduced contributions must be re-enrolled on the three-year cycle; a re-declaration is required. [Source](#)
16. The Pensions Regulator, *Warnings, notices and payment of fines*. Fixed penalties are £400 and escalating penalties range from £50 to £10,000 per day. [Source](#)
17. Department for Work and Pensions, *Workplace pension participation and savings trends: 2009 to 2025* (official statistics announcement, 2 July 2026). The release is provisionally scheduled for 30 July 2026 at 9:30 am. [Source](#)

Suggested citation

This Briefing is intended to be cited. The recommended citation form is:

Culture Meets Capital. *The Enrolment Gap: Automatic Enrolment, Multiple Jobs and the Cultural Workforce*. Policy Briefing No. 3. London: Culture Meets Capital, 5 July 2026. culturemeetscapital.co.uk/publications/policy-briefings/the-enrolment-gap

See also

→ [The Portfolio Career Question — Policy Briefing No. 2](#)

→ [The £560 Million Question — Policy Briefing No. 1](#)

→ [All Policy Briefings](#)

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Version 1.0.1 · 5 July 2026 · Corrected locked publication master · Administrative correction: editorial address removed · Evidence verified to 5 July 2026 · Research and drafting: Culture Meets Capital Editorial Office · Digital statistical review due after 30 July 2026

Culture Meets Capital · Policy Briefings · eISSN forthcoming

Culture Meets Capital Ltd · Registered in England and Wales, company number 16341083 · Registered office: 128 City Road, London EC1V 2NX

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