EMPLOYMENT RIGHTS ACT 2025: TRACKER

Timetable of changes taking place from Royal Assent on 18 December 2025 through to 2027

ADDLESHAW GODDARD

DATE	PROPOSAL	DETAILS AND AMENDMENTS	CONSULTATION	KEY
2025: CONSULTATIONS				
Summer / Autumn 2025 • Reinstating the **School Support Staff Negotiating Body:** Consultation here – *closed 18 July 2025* • **Fair Pay Agreement** for the Adult Social Care sector: Consultation published here – *closed 16 January 2026*				
Autumn 2025 • **Fire and rehire:** Consultation on fire and rehire protections for expenses and shifts published here – *closed 1 April 2026* • **Zero hours contracts** – right to a guaranteed hours contract reflecting regular hours over a reference period – with compensation for cancelled / curtailed shifts [**AWAITED**] • Regulation of **umbrella companies:** Consultation published here on modernising the Agency Work Regulatory Framework to account for the activities of umbrella companies – *closed 1 May 2026* • Rights of **pregnant workers:** Consultation published here – *closed 15 January 2026* • Day 1 right to **new statutory bereavement leave** going beyond existing parental bereavement leave: Consultation published here – *closed 15 January 2026* • **Trade union measures:** - Electronic and workplace **balloting:** Consultation here and draft Code of Practice here – *closed 28 January 2026. NB: Further consultation on e-balloting unfair practices - closed 1 April 2026* - Simplifying trade union **recognition** processes: Consultation on trade union recognition code and e-balloting practices published here – *closed 1 April 2026* - Duty to inform workers of their **right to join** a trade union: Consultation published here – *closed 18 December 2025* - Right of **access:** Consultation published here – *closed 18 December 2025*				
2025-2026: ROYAL ASSENT AND FIRST IMPLEMENTATION On **18 December 2025**, the Employment Rights Bill received Royal Assent to become The Employment Rights Act 2025 (**Act**). See the Government's Factsheet: ***Employment Rights Act – Overview*** and below for implementation details. Most of the Act's provisions require commencement regulations to bring them into force, and many require further substantive regulations (following consultation) to give them full effect. On 7 January 2026, the government published an analysis of the economic impact of the Act. On 3 February 2026, the Government updated the implementation timetable for changes being introduced in 2026 (with subsequent minor updates since then).				
18 December 2025 (day	Repealed the Strikes (Minimum Service Levels) Act 2023	The Act repealed the Strikes (Minimum Service Levels) Act 2023, together with sections 234B to 234G of the Trade Union and Labour Relations (Consolidation) Act 1992 (**TULRCA**). Previously, these provisions enabled the Secretary of State to set minimum service levels for strikes in "relevant services" in the fields of health, transport, education, fire and rescue, border control, nuclear decommissioning and radioactive waste management services.	N/A	

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of Royal Assent)				
18 February 2026 (two months after Royal Assent)	Repealed the majority of the Trade Union Act 2016 and brought in a 12-month mandate and a 10-day notice period for industrial action. The Employment Rights Act 2025 (Commencement No.1 and Transitional and Saving Provisions) Regulations 2026 brought these changes into effect. See the government guidance regarding these changes and **revised codes of practice** for: 1. Picketing: revised code of practice (5 March 2026). 2. Industrial action ballots and notice to employers: revised code of practice (5 March 2026).	The Act also repealed the vast majority of the Trade Union Act 2016 (some provisions to be repealed via commencement order at a later date), resulting in the following changes: (1) **Political Fund Contributions**: New union members now automatically contribute to political funds unless they opt out. The current 10-year balloting requirement has been replaced by a requirement for trade unions to send a reminder notice every 10 years to members informing them of their right to opt-out of the political fund. See the Factsheet ***Political Funds Review Ballots***. (2) **Public sector unions** no longer need to pay for administering check-off arrangements, nor publish information on union officials' facility time. The power to cap facility time has been removed. (3) **Industrial action ballots (information and thresholds)** - *see **separate entry** below.* a. Trade unions no longer need to meet additional reporting requirements for industrial action, such as providing detailed information on voting papers or annual returns. b. Unions only require a simple majority of voting members for lawful industrial action (rather than a 50% turnout threshold). ***NB: To be brought in by regulations on a date to be appointed, seeking to align with the introduction of e-balloting.*** c. Removal of the 40% support threshold for strike ballots in the six key public services (including health and transport). (4) **Industrial action (notice period and length of mandate)**: Notice of industrial action required to be given to employers has reduced from 14 to 10 days. Following consultation, the mandate for industrial action has been extended from 6 to 12 months (without the possibility of extension). (5) **Extended protection against dismissal for taking industrial action** - *see **separate entry** below.* The Act has removed the 12-week cap that an employee is protected for when taking industrial action, where the reason for the dismissal is taking protected industrial action. (6) **Picketing Supervision**: Requirements for unions to appoint picketing supervisors has been abolished. (7) **Electronic Balloting**: The requirement to consult and review electronic balloting has been removed. Following consultation with stakeholders, the Government plans to introduce secure electronic balloting.	N/A	

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		(8) **Certification Officer Powers.** Investigatory powers introduced by the 2016 Act (e.g., investigating complaints, requiring documents, imposing penalties) has been removed. The Certification Officer retains powers to investigate financial affairs from pre-2016 legislation. (9) **Levy Payments**: The requirement for unions and employers' associations to pay a levy to the Certification Officer been abolished. See the Factsheet ***Repeal of the Trade Union Act 2016***.		
18 February 2026	Simplified industrial action notices and industrial action ballot notices Industrial action ballots and notice to employers: code of practice (5 March 2026).	To simplify the requirements for ballot and industrial action notices, the Act has amended the law so that unions only have to ask their members on the ballot paper which type of industrial action they want to take part in (whether that is strike action or action short of a strike). Also, now unions only have to specify the following information in the relevant notices to the employer: • **Section 226A (Notice of Ballot)** (1) List of categories of employees being balloted; (2) List of categories to which relevant employees belong; and (3) List of workplaces in which the employees work • **Section 234A (Notice of Industrial Action)** (1) List of workplaces in which the employees work (2) Total number of employees concerned (3) Total number of affected employees (4) Number of affected employees who work at each listed workplace (5) An explanation of these figures See the Factsheet ***Simplifying Industrial Action and Ballot Notices***.	N/A	
18 February 2026	Extended protection against dismissal for taking industrial action	The Act has removed the 12-week cap that an employee is protected for when taking industrial action, where the reason for the dismissal is taking protected industrial action. Employees will now be protected regardless of the length of the strike action against unfair dismissal when taking protected industrial action. Should an employer wish to dismiss an employee during long-running protected industrial action, the dismissal would have to be for reasons other than participating in industrial action. See the Factsheet ***Protection for taking Industrial Action***.	N/A	

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WINTER 2026 CONSULTATIONS				
Winter / Early 2026 • **Alternative threshold for triggering collective redundancy consultation** – Consultation published here - *closing date 21 May 2026* • **Flexible working** – Consultation on proposed flexible working changes published here – *closed 30 April 2026* • **Tipping policies** - Consultation on strengthening the existing law on tipping published here – *closed 1 April 2026* • **Trade union measures** - Protection against **detriments for taking industrial action –** Consultation published here – *closed 23 April 2026* - Updating **blacklisting** regulations to protect a wider range of people [**AWAITED**]				
APRIL 2026 IMPLEMENTATION				
6 April 2026	Maximum period of protective award has doubled from 90 to 180 days	Doubling the maximum period of the protective award means that whenever an employer fails to fulfil their collective redundancy obligations and a complaint is made, an Employment Tribunal is now able to award up to 180 days' pay against the employer instead of the previous maximum of 90 days. Government guidance confirms that the change applies to dismissals taking place on or after 6 April 2026. See the Factsheet ***Collective Redundancy***.	Previous consultation concluded at the end of 2024.	
6 April 2026	Day 1 right to paternity leave and to unpaid parental leave The Employment Rights Act 2025 (Parental and Paternity Leave) (Removal of Qualifying Periods etc) (Consequential Amendments) Regulations 2026	The Act makes paternity leave a day one right by removing the current qualifying period of 26 weeks for fathers. Measures have also been introduced to make unpaid parental leave a day one right, instead of parents only being eligible if they have been with their employer for more than one year. See the Factsheet ***Bereavement, Paternity and Unpaid Parental Leave***. The Employment Rights Act 2025 (Parental and Paternity Leave) (Removal of Qualifying Periods etc) (Consequential Amendments) Regulations 2026 (SI 2026/15) implements sections 15 to 17 of the Act by abolishing the minimum service thresholds for both parental and paternity leave and removing the restriction that prevented employees from taking paternity leave following shared parental leave, from 6 April 2026. They took effect on 18 February 2026 to allow employees to give advance notice for the parental or paternity leave that they are now entitled to take from 6 April 2026 onwards (regulation 1(2)).	N/A	
6 April 2026	Whistleblowing protections for those	Sexual harassment has been added to the list of relevant failures under s.43B of the Employment Rights Act 1996 (**ERA**) that can form the subject-matter of a protected disclosure. The change means that workers no longer need to identify an existing legal obligation, criminal offence or breach of health and safety to make a qualifying	N/A	

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	reporting sexual harassment	disclosure about sexual harassment, provided they've complied with the other requirements in the legislation, such as holding a reasonable belief that the issue is in the public interest. See the Factsheet ***Strengthening Protections for Whistleblowers***.		
6 April 2026	Day 1 right to statutory sick pay (no 3-day waiting period) and removal of the lower earnings limit	Statutory Sick Pay (**SSP**) has become a day one right for all employees through removal of the current three-day waiting period and the requirement to earn at or above the Lower Earnings Limit (**LEL**). Eligible employees are entitled to SSP from their first full day of sickness absence, rather than the fourth. The newly established FWA will be responsible for enforcement. Following consultation, the Act was amended to allow employees on low wages or unable to work due to sickness to receive **either** 80% of their normal weekly earnings **or** the current rate of SSP (£123.25 from April 2026), whichever is lower. Removing the LEL means that up to 1.3 million of the lowest-paid employees (such as part-time or casual workers and other low earners) will become entitled to SSP. The Department of Work and Pensions estimates the cost to businesses of removing SSP waiting days and the LEL (with a percentage rate of 80%) as £450 million annually, about £15 more per employee (see impact assessment here). See the Factsheet ***Statutory Sick Pay***.	Previous consultation concluded at the end of 2024.	
6 April 2026	A simplified statutory union recognition process	The Act makes significant changes to the trade union recognition process to simplify and improve fairness. Recognising a non-independent union will no longer prevent an independent union from applying for recognition. Other changes include: 1. **Simpler ballot threshold**: Unions no longer need 40% workforce support in a recognition ballot, but just a simple majority of those voting. New recruits added to a bargaining unit after a recognition application is submitted do not count towards the process nor are allowed to vote in the ballot. 2. **Membership threshold for applications**: Unions applying for recognition only need to show 10% membership of the bargaining unit, instead of proving they are likely to win a ballot. Ministers are able to adjust the 10% membership requirement through regulations, within a range of 2% to 10%. 3. **Timetable for access negotiations**: Employers and unions have 20 working days to agree on access terms. If no agreement is reached, the CAC has 10 working days to set a reasonable access agreement. The changes aim to make the recognition process fairer, reduce employer interference, and ensure unions can effectively represent workers. See the Factsheet ***Simplifying the Trade Union Recognition Process***.	Delayed from Autumn 2025, on 4 February 2026, the Government announced a consultation on: (1) An updated Draft Code of Practice on access and unfair practices during recognition and derecognition processes; and (2) Potential updates to the law	

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		On 4 February 2026, the Government published a consultation on: 1. An updated Draft Code of Practice on access and unfair practices during recognition and derecognition processes, to help ensure that the process of statutory recognition and derecognition for trade unions is clearer and affords workers across the country greater opportunity to organise within the workplace; and 2. Potential updates to the law on unfair practices, that would enable the use of electronic balloting via workplace email addresses for statutory recognition and derecognition ballots.	on unfair practices. *The consultation closed on 1 April 2026.*	
6 April 2026	Voluntary gender pay gap and menopause support equality action plans (for employers with 250+ employees) ***NB: Mandatory from Spring 2027*** Publication of new menopause guidance for employers	The Act expands equality and pay transparency duties, introducing Equality Action Plans. In time, gender pay gap reporting will also be extended to outsourced workforces. **Equality Action Plans** ***(voluntary from April 2026, mandatory from 2027)*** The Act allows regulations to require large employers (250+ employees) to publish "Equality Action Plans" detailing the evidence-based actions they are taking to improve gender equality and to support employees during the menopause. By having access to information and guidance about effective actions that are backed up by evidence, employers are supported to select appropriate actions. Employers will publish their plans on the gender pay gap reporting service. The changes are voluntary from 6 April 2026 (for the 2026-2027 reporting year) becoming mandatory from Spring 2027 (for the 2027-2028 reporting year). **Gender Pay Gap Outsourcing Measure** ***(timing tbc)*** To motivate employers to support efforts to improve gender equality in organisations that they are linked to, future regulations will also require employers to name who they received outsourced work from, which will be visually reflected on the gender pay gap reporting service. ***NB: The Government's Roadmap to the reforms notes that implementation of this measure will be dependent on timelines for broader changes to pay gap reporting, including related measures in the draft Equality (Race & Disability) Bill.*** See the Factsheet ***Equality Action Plans and Outsourcing*** for details on both measures.	N/A	
6 April 2026	Employers required to keep records of compliance with the WTR on annual leave and pay for six years	Section 35 of the Act has introduced a new Regulation 16B into the Working Time Regulations 1998 (**WTR**) requiring employers to keep records that are 'adequate to show' whether they have complied with their obligations in relation to annual leave and to keep such records for six years from the date on which they were made. Such records may be created, maintained and kept in such manner and format as the employer reasonably thinks fit. Failing to keep adequate annual leave records will amount to a criminal offence and result in a fine, which could be unlimited.	N/A	

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	(failure punishable as an offence with a fine).	Until the Employment Rights Act 2025 (Commencement No. 2 and Transitional and Saving Provisions) (Amendment) Regulations 2026 (SI 2026/323) were published in March 2026, it was not clear when this provision would come into force as it did not appear on the Government's Roadmap in July 2025, nor the updated timetable in February 2026. It took effect on 6 April 2026. Enforcement will be by the new Fair Work Agency, which was established on 7 April 2026 although has not yet been granted the power to enforce these measures (expected in 2027).		

7 April 2026	The Fair Work Agency brings together existing state enforcement functions including:
	• Regulating employment agencies and employment businesses
	• Unpaid Employment Tribunal (**ET**) award penalty scheme
	• Enforcing the National Minimum Wage Act 1998 (**NMW**)
	• Enforcing the WTR (including holiday pay)
	• Statutory Sick Pay (**SSP**)
		The Fair Work Agency (**FWA**) was established in April 2026, bringing together existing enforcement bodies. IN time, it will take on the enforcement of other employment rights, such as holiday pay and statutory sick pay. The Act abolishes the Gangmasters and Labour Abuse Authority and the Director of Labour Market Enforcement, although their work will carry on under the FWA. The FWA's remit includes:
		• **Powers to inspect workplaces** and require employers to produce documents evidencing compliance with employment law, based on powers of the existing bodies.
		• A **civil penalty regime** based on the NMW. Where employers have underpaid workers, enforcement officers will be able to issue Notices of Underpayment requiring payment of what is due and a penalty to government.
		  ◦ The FWA will be able to issue notices of underpayment of non-payment of any statutory payment (e.g. SSP, holiday pay or NMW) requiring payment of the amount within 28 days. Underpayments may go back 6 years from the date of giving notice and can relate to sums due before the Act comes into force.
		  ◦ Notices may also impose a penalty up to a maximum of £20,000 which may be discounted by 50% if sums due are paid within 14 days of the notice, with courts able to enforce a failure to comply with a notice.
		• A **civil proceedings power** to bring proceedings in the ET on a worker's behalf, and to offer legal advice and assistance or representation where someone is/may be party to civil legal cases related to employment or trade union law.
		• **Cost recovery** - the FWA is able to require the employer to pay a charge so that the FWA can recover the cost of taking enforcement action against non-compliant employers (to be set out in regulations). It remains to be seen how this will work in practice or how often the powers will be used or funded. We await further details.
		• An **enforcement regime** in respect of labour market criminal offences involving voluntary Labour Market Enforcement Undertakings and compulsory Labour Market Enforcement Orders (breach of which is an offence that can result in fines or imprisonment).
			N/A	

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	• Licensing regime for businesses operating as 'gangmasters' in certain sectors.	The Act is the first phase of laying the foundation for the creation of the FWA, with implementation taking place in phases following Royal Assent. On 7 April 2026, the Government published a strategic steer to the FWA, detailing the transitional arrangements during 2026. This confirms that, during 2026/27, NMW enforcement will continue to be delivered by HMRC under a contracting arrangement with the FWA to ensure continuity of service while the FWA prepares for the full transfer of NMW functions in April 2027. The Government has committed to giving the FWA the tools and resources it needs to do its job effectively, with details around implementation and funding to be provided in due course. On 24 March 2026, The Times reported Matthew Taylor (Chairman) as saying that the FWA will focus on persuading employers to comply with employment reforms rather than using its enforcement powers, noting that the threshold for deploying these powers is "quite high" and stressing the need for proportionality. The Government's updated Factsheet: ***Fair Work Agency*** notes "*The FWA will aim to "resolve issues upstream by supporting employers that want to comply with the law. But it will also have strong powers to investigate and take action against businesses that flout the law, to level the playing field for compliant businesses*."		
AUGUST 2026 IMPLEMENTATION				
August 2026	Electronic and workplace balloting **(Phase 1)** • Hybrid electronic balloting for all statutory union ballots • Pure e-balloting for all statutory union ballots other than recognition and	The Government is committed to introducing the use of modern and secure electronic balloting for trade union statutory ballots. By repealing the Trade Union Act 2016, the Act removes the requirement to consult and publish a review on electronic balloting. The government plans to provide for two methods of electronic balloting: (1) **Pure e-balloting**, where both ballots are distributed and voting is done electronically; and (2) **Hybrid e-balloting**, where ballots are distributed via post and voting is done either electronically or via post. The Government consulted on 19 November 2025 and published a draft Code of Practice (*closed on 28 January 2026).* A further consultation on unfair practices in recognition ballots published on 4 February 2026 explains that electronic balloting will be introduced in two phases. 1. **Phase One (August 2026):** Trade unions will be able to use hybrid electronic balloting for all statutory union ballots and pure e-balloting for all statutory union ballots other than recognition and derecognition ballots. ***NB: Recognition and derecognition ballots involve balloting workers who are not union members, which differentiates them from other statutory union ballots. It means that any use of 'pure' electronic balloting for a recognition or derecognition ballot will involve the use of workers' workplace emails, as unions and employers may not have personal email addresses for the entire potential bargaining unit.***	Consultation published here on 19 November 2025 alongside a draft Code of Practice – *closed 28 January 2026.* Consultation on e-balloting unfair practices *closed 1 April 2026.*	

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	derecognition ballots	2. **Phase Two (2027)** will allow pure electronic balloting to be used in recognition and derecognition once the following changes to legislation have been made: a. To amend Schedule A1 to the Trade Union and Labour Relations (Consolidation) Act 1992 (**1992 Act**) allowing the CAC to request workplace email addresses for all workers in a bargaining unit from employers. b. Adding to the list of unfair practices that parties are prohibited from engaging in during recognition and derecognition ballots (set out in Schedule A1 to the 1992 Act). See the Factsheet ***Trade Unions in the Employment Rights Act***.		
August 2026	Industrial action ballots	Unions will only require a simple majority of voting members for lawful industrial action (rather than a 50% turnout threshold). ***NB: Will be brought in by regulations on a date that aligns with the introduction of e-balloting.***		
OCTOBER 2026 IMPLEMENTATION				
October 2026	Amend the Procurement Act 2023 to protect transferring workers on outsourcing contracts and introduce a two-tier workforce code of practice for outsourced workers	Previously, the *Code of Practice on Workforce Matters in Public Sector Service Contracts* (known as the "***two-tier Code***") sought to ensure fair and equitable employment conditions between public sector staff who had been transferred under TUPE and private sector employees working on the same outsourced public sector service contracts. However, this was withdrawn in 2010 and replaced with less stringent *Principles of Good Employment Practice* which could be applied on a voluntary basis. The Act proposes to **reinstate the "two-tier Code"** to address disparities in terms and conditions and ensure fair employment conditions for private sector employees working on outsourced public sector contracts, aligning them with those transferred under TUPE from the public sector. In particular: • The Government will set regulations (which may include model contract terms and guidelines for their application), specifying provisions for outsourcing contracts to ensure private sector workers are treated no less favourably than their TUPE-transferred counterparts. Contracting authorities must take "all reasonable steps" to include these provisions in relevant contracts. • A new statutory code of practice will enhance the legal weight of these measures compared to the previous code (which was non-statutory for Government departments) and allow the government the opportunity to align with the development of the UK's international trade obligations and reflect domestic employment laws which have evolved since 2010. See the Government's Factsheet ***Public Sector Outsourcing (Protection of Workers)***.		

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October 2026	Employers required to consult workers/any recognised trade union about the allocation of tips and gratuities	The Act will strengthen the law on tipping to make it mandatory for employers when developing tipping policies to consult with workers at the place of business. Currently, consultation should take place with recognised trade union or other elected representatives where possible, unless, if they are absent, directly with the workers affected. Employers will be required to review their policy on tipping at least once every three years and to make an anonymised summary of the views expressed in the consultation available to all workers of the employer at the place of business where the policy applies. Measures will be enforced via the ET system, with employers who fail to consult properly with their workers liable to compensate workers by up to £5,000 for financial loss sustained by the worker that is attributable to the employer's failure. The Government consulted in early 2026, so some of these measures may be adjusted when the outcome of that consultation is published. See the Government's Factsheet ***Tips and Gratuities*** for more detail.	Consultation on strengthening the existing law on tipping published here – *closed 1 April 2026.*	
October 2026	New duty to inform new employees of their right to join a trade union in a written statement (and all staff on a regular basis)	A new duty on employers to inform workers of their right to join a trade union in a written statement alongside the statement of particulars of employment that they are already required to produce for new workers under section 1 of the Employment Rights Act 1996 and to inform them of their right to join a trade union on a regular basis after that. See the Factsheet ***Right to Statement of Trade Union Rights.*** Specific details of this requirement, including the form, the frequency and manner of communication, will be set out in secondary legislation, following consultation. The prescribed information may include that the worker has rights conferred by Part 3 of TULRCA. These are right associated with being, or potentially being, a trade union member. The Government will be adopting the existing enforcement mechanism that applies to a failure to provide the written statement of particulars of employment, set out in Section 38 of the Employment Act 2002.	**Autumn 2025** Consultation published here on 23 October 2025 – *closed 18 December 2025.*	
October 2026	New rights for trade unions to access the workplace for recruitment and organising purposes	A new right for trade unions with a certificate of independence issued by the Certification Officer to make applications to physically **access the workplace** or communicate with workers 'digitally' or via other means for the purposes of meeting, representing, recruiting or organising workers and to facilitate collective bargaining. If an employer refuses such a request, the union can apply to the CAC to determine whether access can be granted. The changes will provide an opportunity for unrecognised unions to recruit and organise within a workplace with the aim of gaining recognition. See the Factsheet ***Right To Statement of Trade Union Rights***.	**Autumn 2025** Consultation published here on 23 October 2025 – *closed 18 December 2025.*	
October 2026	Requirement for employers to take **all** reasonable steps to	On 26 October 2024, the Worker Protection (Amendment to the Equality Act 2010) Act 2023 introduced a legal duty on employers to take "reasonable steps" to prevent sexual harassment of their employees.	N/A	

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	prevent sexual harassment at work	The Act will amend the duty to require employers to take "**all** reasonable steps" to prevent sexual harassment of their employees. What constitutes "all reasonable steps" will depend on the specific circumstances of the employer, such as their size, sector, and other relevant facts. The amended duty will mirror the existing concept of the "all reasonable steps" defence in section 109(4) of the Equality Act 2010, so that the threshold in the preventative duty is consistent with the existing statutory defence against an employer's vicarious liability for the actions of their employees, which can be used in sexual harassment claims. Removing the discrepancy seeks to ensure that there's no confusion or perception of a lower threshold for sexual harassment. See the Factsheet ***Employers to take all reasonable steps to prevent sexual harassment.***		
October 2026	Power to enable regulations to specify steps to be regarded as 'reasonable' to determine whether an employer has taken all reasonable steps to prevent sexual harassment	The Act introduces a power to allow the Government to make regulations at a later date to specify steps that are to be regarded as "reasonable" for the purpose of determining whether an employer has taken, or failed to take, all reasonable steps to prevent sexual harassment of an employee. A non-exhaustive list of obligations will be set out what are to be regarded as reasonable steps an employer must take in order to prevent workplace sexual harassment. Employers to which the duties apply must take these steps while also taking all other preventative steps that are reasonable in the particular circumstances. Any requirements specified will be reasonable for the employers to which they apply. The steps that may be specified in regulations include carrying out assessments of a specified description, publishing plans or policies of a specified description, steps relating to the reporting of sexual harassment and steps relating to the handling of complaints. See the Factsheet ***Power to make provision about "reasonable steps".***	N/A	
October 2026	Reintroduce employer liability for third party harassment for all relevant protected characteristics	The Act will introduce **protection from third-party harassment** for all three forms of harassment in section 26 of the Equality Act 2010 (sexual harassment, treating someone less favourably because he or she has either submitted to or rejected sexual harassment or harassment related to sex or gender reassignment). All protected characteristics in scope of the existing harassment provisions are in scope of this clause: age, disability, gender reassignment, race, religion or belief, sex, and sexual orientation. An employer will be held vicariously liable where an employee is harassed by a third party in the course of their employment and it is shown that the employer failed to take all reasonable steps to prevent the third party from harassing them. Individuals will be able to take a claim against their employer to an Employment Tribunal, and the Equality and Human Rights Commission may also use its enforcement powers to take action. Employment Tribunals will take into account that the steps an employer can reasonably take in respect of the actions of third parties in their workplace are more limited than the steps they can take in respect of their employees. Employers will need to do what is reasonable; for example, consider the nature of any contact with third	N/A	

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		parties, including the type of third party, frequency, and environment. See the Factsheet ***Harassment by third parties***.		
October 2026	Sufficient access to facilities and strengthened right to facility time off for trade union reps and statutory rights for trade union equality reps	The Government wants to ensure that union workplace representatives can take sufficient paid facility time with sufficient access to facilities to enable them to fulfil their union representative duties. The Act will: 1. **Strengthen the existing right to reasonable paid facility time** for union representatives by establishing a presumption that the employee's view on what constitutes "reasonable" paid time off for union duties is correct (with regard to an ACAS Code of Practice), unless the employer can prove otherwise in a tribunal; 2. Require employers to provide union representatives, where permitted to take time off as required, with **access to facilities** (e.g. office and meeting space and access to the internet / intranet) as is reasonable in all the circumstances to enable them to carry out their duties or undergo training, having regard to any relevant provisions of a Code of Practice issued by ACAS; 3. Provide a **new statutory right for trade union equality representatives to take time off** (as is reasonable in all the circumstances having regard to an ACAS Code of Practice) during the employee's working hours for the purposes of: o Carrying out activities for the purpose of promoting the value of equality in the workplace; o Arranging learning or training on matters relating to equality in the workplace; o Providing information, advice or support to qualifying members of the trade union in relation to matters relating to equality in the workplace; o Consulting with the employer on matters relating to equality in the workplace; o Obtaining and analysing information on the state of equality in the workplace; and o Preparing for any of the things mentioned above. See the Factsheet ***Access to Facilities and Facility Time***.	ACAS consultation on updates to its Code of Practice on time off for trade union duties and activities – *closed 17 March 2026*. See consultation here.	
October 2026	Provide protection against detriment for taking part in protected industrial action	In *Secretary of State for Business and Trade v Mercer [2024],* the Supreme Court accepted that the UK is not required to provide universal protection in all circumstances to all workers against any detriment (however slight) intended to dissuade or penalise workers from participating in a lawful strike. To address this, the Act will amend TULRCA by inserting new section 236A into Part V (Industrial Action) to provide that a worker has the right not to be subject as an individual to detriment of a prescribed description by an act, or any deliberate failure to act, by the worker's employer, if the act or failure takes place for the sole or main purpose of preventing or deterring the worker from taking protected industrial action, or penalising the worker for doing so.	**Winter/Early 2026** Consultation on protection against detriments for taking industrial action (including what should be	

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		The prescribed detriment(s) will be set out in secondary legislation following consultation. The power in the Act enables the Secretary of State to prohibit all detriments in secondary legislation, should that be the preferred approach following consultation. See the Government's Factsheet ***Protection for Taking Industrial Action***.	prescribed as a detriment) – published here – *closed 23 April 2026.*	
October 2026	Bringing forward regulations to establish the Fair Pay Agreement Adult Social Care Negotiating Body	The Act allows the Government to establish an industry-wide body composed of representatives of employers and unions in the social care sector (the Adult Social Care Negotiating Body). The Government will be able to 'ratify' agreements reached within this negotiating body relating to the terms and conditions of all staff employed in the provision of adult social care in England, when they would become binding on all employers in the sector.	Consultation published here – *closed 16 January 2026.*	
October 2026	Unfair practices in the trade union recognition process	The Act makes changes to deal more effectively with unfair practices during the recognition and derecognition processes. The Government is updating the Code of Practice on access and unfair practices during the recognition process to reflect these changes and to help foster a new partnership of cooperation between trade unions and employers. On 4 February 2026, the Government published a consultation on (1) An updated Draft Code of Practice on access and **unfair practices during recognition and derecognition processes**; and (2) **Potential updates to the law on unfair practices**. The consultation closed on 1 April 2026. The Government intends to publish further guidance on the whole recognition and derecognition process when they implement the provisions in the Act and this Code later in 2026. The access and unfair practices provisions reflected in the revised Code of Practice relate solely to the recognition and derecognition process.	The Government has consulted on: (1) An updated Draft Code of Practice on access and unfair practices during recognition and derecognition processes; and (2) Updating the law on unfair practices – *closed 1 April 2026.*	
Not before October 2026	Extend time for bringing an employment claim from 3 to 6 months	The Act will increase the time limit for making a claim to an employment tribunal from 3 months to 6 months for all claims. The new 6-month time limit will only apply to causes of action arising on or after the implementation date and will not have retrospective effect, meaning the 3-month time limit will apply to all earlier claims.	N/A	

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DECEMBER 2026 IMPLEMENTATION				
December 2026	Commencement of the Mandatory Seafarers Charter	A new mandatory charter for seafarers will require with higher standards around health and safety, pay, job security and rest breaks. Operators of services in scope will be requested by the harbour authority to declare that they are meeting these requirements to continue accessing the port. Failure to do so will incur a charge on each occasion that the vessel providing the service enters the port. If the surcharge is not paid, access to the port will be denied.		
JANUARY 2027 IMPLEMENTATION				
1 January 2027	Reduce the unfair dismissal qualifying period from 24 months to 6 months for dismissals from 1 January 2027 **and** remove the current cap on compensation	On 27 November 2025, the Government announced that it is dropping the pledge for day-one unfair dismissal protection. Instead, it will reduce the qualifying period to 6 months and lift the cap on compensation. The amendments included a clause to: • reduce the qualifying period for unfair dismissal protection to six months (rather than making it a day one right as had originally been proposed, but still a substantially shorter period than the current two years). • remove the overall limit on the compensatory award for unfair dismissal (both the 52-weeks' pay and the compensation cap (currently £123,543)); and • remove the power to vary the qualifying period by regulations, (meaning that the six-month limit could only be amended by primary legislation). The new six-month unfair dismissal right will begin from 1 January 2027 (confirmed in the latest implementation timetable published on 3 February 2026). The complete removal of the limit on the compensatory award for unfair dismissal is likely to have far-reaching consequences leading to higher compensation awards in some cases as well as affecting settlement expectations and negotiations. We could see an increase in disputes over the loss of valuable benefits and changes in litigation tactics as well as employers needing to act promptly within the first six months of employment on any capability or conduct issues. See the Factsheet: ***Unfair dismissal.***	Consultation is no longer required. In January 2026, the Government published an impact statement regarding the removal of the cap on compensation for unfair dismissal.	
January 2027	Ban on fire and rehire for restricted variations (e.g. reduction in pay or holiday, changes to	The Act will **end 'Fire and Rehire' and 'Fire and Replace'** save in very limited circumstances where an employer has no alternative to remain a viable business. An amendment ensures that failure to agree to a variation of contract does not apply to employees who have not yet started work.	Delayed from Autumn 2025, a consultation was published here on	

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	hours) except where no alternative to remain viable.	In July 2025, in response to concerns that the new provisions could apply to relocation situations (requiring employers to have to budget for significant automatic unfair dismissal costs if not all employees agreed to the change of place of work) the Government amended the Act so that: • The ban will only apply to 'restricted variations', including reductions in an employee's pay or holidays, changes to hours, pension and other changes defined in regulations (which may include benefits), but not location or duties. The ban will also include any dismissals relating to an attempt to impose a new flexibility clause covering any of these changes. • Where an employee is dismissed for failing to agree to a variation of their contract that is not a 'restricted variation', the dismissal will no longer be automatically unfair and the matters that must be considered in determining whether the dismissal is fair or unfair are set out in a new provision, which requires tribunals to take account of the reason for the variation, any individual or collective consultation and anything the employee was offered in return for the change. Dismissals will be automatically unfair if the reason for dismissal is to replace an employee with someone who is not employed (e.g. self-employed independent contractors, agency workers or any other individuals who are not employed by the employer), if any such replacement is going to do substantially the same work. This is provided that the 'financial difficulty' exemption does not apply and the employer could not reasonably have avoided the need to replace the employee. See the Factsheet ***Fire and Rehire***. The Government's original implementation timetable published in July 2025 scheduled this change to take place in October 2026. However, on 3 February 2026, the Government published an updated timetable moving it to January 2027.	4 February 2026 seeking views on: 1. **Which expenses and benefits in kind should be excluded** from the scope of the restricted variation of reductions to pay; and 2. **Whether there are any types of changes to shift patterns which should be protected** as a restricted variation *– closed 1 April 2026.*	
2027 IMPLEMENTATION				
2027	Ban 'exploitative' zero hours contracts and introduce: 1. A right to a guaranteed hours contract reflecting regular hours (12-week reference period); and	The Act will ban "exploitative" zero hours contracts. Those on zero hours or low hours contracts who regularly work more than these hours will have the right to a **guaranteed hours contract** which reflects the hours they regularly work over a 12-week reference period. If more hours become regular over time, subsequent reference review periods will provide workers with the opportunity to reflect this in their contracts. Those who wish to remain on zero hours contracts will still be able to do so. Measures will also be introduced to ensure workers get **reasonable notice of changes in shifts or working time, with proportionate compensation for any shifts cancelled or curtailed at short notice**.	**Autumn 2025** [**AWAITED**] The consultation is likely to include: • The reference period for calculating average hours.	

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	2. Reasonable notice of shift changes, with compensation for curtailed or cancelled shifts.	The Act was amended in March and July 2025 to: (i) Include agency workers on a zero or 'low hours' contract in the zero hours contracts measures; (ii) Allow contracting out from the zero hours measures under the terms of a collective agreement. For agency workers, the collective agreement can be with the person who has the contract with the agency worker; (iii) Introduce anti-avoidance provisions to prevent employers from manipulating the hours made available to a worker with the intention of making a lower guaranteed hours offer or avoiding the obligation; (iv) Require end-hirers to make a guaranteed hours offer to an agency worker that protects the agency worker's pay and conditions, so that these are no less favourable than they had previously been working under (or those of comparable workers doing broadly similar work); (v) Clarify that when an agency worker accepts a guaranteed hours offer from an end-hirer, they will become a worker (rather than an employee); (vi) Place responsibility on both the employment agency and the end hirer for providing an agency worker with reasonable notice of shifts, with tribunals able to apportion liability appropriately; (vii) Allow regulations to prescribe how agency workers should receive notice of shifts and any cancellations, curtailments or movements; (viii) Allow employment agencies to be responsible for paying short notice cancellation, movement or curtailment payments to eligible agency workers (subject to recouping these from the hirer where it is their responsibility for up to two months after the Act is passed, after which this will need to be provided for in the agreement between the hirer and the agency). The reference period for calculating average hours has still not been defined, although a period of 12 weeks has previously been mentioned. New guidance about the application of zero hours measures to agency workers will be published before the measures come into force.	• How to ensure agency workers receive reasonable notice of shifts. • Rights to payments for short notice cancellation, curtailment and movement of shifts. • What is a temporary need (defined in regulations, regarding concerns about seasonal/temporary work).	
2027	Duty to collectively consult triggered by number of people impacted across the business rather than in one workplace	Currently, the duty to collectively consult arises where an employer is proposing to dismiss as redundant 20 or more employees at one establishment within a period of 90 days or less. Initially, the Act proposed removing the words "at one establishment" so that the number of proposed redundancies for collective redundancy consultation purposes would be determined across the business. However, responding to concerns from multi-site employers about the scope for being in a continual state of collective consultation, the Government amended this in March 2025 to instead allow further regulations to specify an **alternative, organisation-wide threshold number for collective consultation.** This means that collective consultation will only be triggered if: (a) there are 20 or more redundancies at one establishment; OR (b) the alternative threshold is met.	**Winter / Early 2026** Consultation on alternative threshold for triggering collective consultation published here -	

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		The Government is currently consulting on where to set this level for triggering collective redundancy obligations, with options including either a single fixed organisation-wide threshold or different tiered thresholds depending on the size of the employer. The consultation closes on 21 May 2026, with the new, alternative, threshold set to come into force in 2027. The Act was also amended to clarify that employee representatives will not all need to be consulted together, nor the same agreement reached with all of them in relation to separate batches of redundancies. Further guidance will be issued for employers on consultation processes for collective redundancies. See the Factsheet ***Collective Redundancy***.	***closing date 21 May 2026***.	
2027	Day 1 right to flexible working as the default for all workers (refusal of requests only if reasonable on prescribed grounds)	The Act aims to support access to flexible working by ensuring that employers accept reasonable and feasible requests. Currently, employers only have to deal with the request in a reasonable manner and base the refusal on one of a list of reasons. Under the new regime, employers will only be able to reject a flexible working request where it is reasonable to do so on the grounds of one (or more) of the eight business reasons already set out in primary legislation. If an employer wants to reject a request, they will need to consult with the employee (as they currently do), but by following a specified process, to be set out in secondary legislation. If an employer rejects a request, they must explain to the employee in writing what the ground for any refusal is and why their refusal is considered reasonable. The changes will make refusal of flexible working requests more difficult for employers as the employer has to be reasonable in its reliance on the factors. There is no change to the penalty for a breach of the requirements (currently, 8 weeks' pay). See the Factsheet ***Flexible Working***.	A consultation on proposed flexible working changes published here – *closed 30 April 2026.*	
2027	Day 1 right to new statutory bereavement leave going beyond existing parental bereavement leave (to include pregnancy loss before 24 weeks)	The Act establishes a statutory 'day one' right to at least one week of unpaid bereavement leave for those in a qualifying relationship to the deceased. A "bereaved person" will be defined under separate regulations. Originally, the Act did not reference pregnancy losses before 24 weeks. However, in July 2025, the Government extended the new statutory bereavement leave to employees who experience pregnancy loss before 24 weeks. This will entitle mothers and their partners to at least one week of leave, although the exact amount of leave is still to be consulted on. The amendments clarify that the definition of "pregnancy loss" will cover the ending of a pregnancy before 24 weeks in any way other than a live birth, including abortions and implantation failure following IVF treatment. See the Factsheet ***Bereavement, Paternity and Unpaid Parental Leave.***	**Autumn 2025** Consultation published here – *closed 15 January 2026.*	

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2027	Mandate gender pay gap and menopause support equality action plans (for employers with 250+ employees)	The Act expands equality and pay transparency duties, by allowing regulations to require large employers (250+ employees) to publish "Equality Action Plans" detailing the evidence-based actions they are taking to improve gender equality and to support employees during the menopause. Employers are supported to select appropriate actions by having access to information and guidance about effective actions that are backed up by evidence. Employers will publish their plans on the gender pay gap reporting service. Having been voluntary for the 2026-2027 reporting year, the changes will be mandatory from Spring 2027 (for the 2027-2028 reporting year). NB: Future regulations will also require employers to name who they received outsourced work from, which will be visually reflected on the gender pay gap reporting service. *However, the Government's Roadmap to the reforms notes that implementation of the gender pay gap outsourcing measure will be dependent on timelines for broader changes to pay gap reporting, including related measures in the draft Equality (Race & Disability) Bill.* See the Factsheet ***Equality Action Plans and Outsourcing***.	N/A	
2027	Make it unlawful to **dismiss** a woman during pregnancy and up to 6 months after her RTW (except specific circumstances)	Currently, it is automatically unfair to dismiss an employee because they are pregnant or on maternity leave and women have the right to be offered suitable alternative employment (if available) in a redundancy situation starting from when they notify their employer of their pregnancy and ending 18 months after the baby's birth. The Act will allow the government to introduce regulations to cover other dismissals (which are not redundancies) taking place during pregnancy, maternity leave or following a return to work, so that it will be unlawful for employers to dismiss pregnant women, and mothers on maternity leave, in the six months after they return to work - except in specific circumstances. This will extend the current protection from redundancy during or after a protected period of pregnancy so that it applies to redundancy **or dismissal** during or after a protected period of pregnancy. Following consultation, regulations will set out details of the enhanced dismissal protection policy, including: • the circumstances in which it will be fair to dismiss a pregnant woman or new mother; • the six-month period of protection after the employee has returned to work; and • any procedural elements, such as notice and evidence requirements. Other powers in the Act will allow regulations to extend the enhanced dismissal protections to parents returning from other types of family-related leave such as adoption leave and shared parental leave. This will be explored through consultation. See the Factsheet ***Enhanced dismissal protections for pregnant women and new mothers***.	The Government is consulting on the detail of the enhanced dismissal protections before finalising the approach. Consultation published here – *closed 15 January 2026.*	

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2027	Specifying steps that are to be regarded as 'reasonable', to determine whether an employer has taken all reasonable steps to prevent sexual harassment	A non-exhaustive list of obligations will specify steps to be regarded as reasonable to determine whether an employer has taken all reasonable steps to prevent workplace sexual harassment. Any requirements specified will be reasonable for the employers to which they apply. The steps that may be specified in regulations include, among others: • carrying out assessments of a specified description • publishing plans or policies of a specified description • steps relating to the reporting of sexual harassment • steps relating to the handling of complaints carrying out assessments of a specified description, publishing plans or policies of a specified description, steps relating to the reporting of sexual harassment and steps relating to the handling of complaints. See the Factsheet ***Power to make provision about "reasonable steps".***		
2027	Strengthen protections against blacklisting by updating blacklisting regulations to protect a wider range of people	The Act extends amends the Employment Relations Act 1999 to allow strengthened protections against blacklisting to be delivered by secondary legislation and guidance. Currently, lists prepared for the purposes of discrimination are prohibited. This Act will extend prohibitions to lists that are not prepared for the purposes of discrimination but later used for that purpose. The Government will also bring forward secondary legislation and guidance to make it clear that blacklisting prohibitions extend to lists created by predictive technology. The Act also removes references to employers or employment agencies within the blacklisting legislation, widening the scope of the existing power so that regulations can be made to strengthen protections in relation to third parties compiling blacklists, for example, those who do not have a direct employment relationship with the individual being blacklisted. See the Factsheet ***Blacklisting***.	**Winter/Early 2026** [**AWAITED**]	
2027	Industrial relations framework	The Government intends to establish a new industrial relations framework, to modernise the legal framework that underpins trade unions.		
2027	Electronic and workplace balloting **(Phase 2)** – *electronic balloting in recognition*	The Government is committed to introducing the use of modern and secure electronic balloting for trade union statutory ballots through p**ure e-balloting**, where both ballots are distributed and voting is done electronically, and **hybrid e-balloting**, where ballots are distributed via post and voting is done either electronically or via post. As the consultation on e-balloting unfair practices explains (published 4 February 2026 and closes 1 April 2026), the Government intends to introduce electronic balloting in two phases.	The consultation was published here on 19 November 2025 alongside a draft	

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	and derecognition ballots	Once Phase One has been implemented in August 2026 (allowing hybrid electronic balloting to be used for all statutory union ballots and pure e-balloting to be used for all statutory union ballots other than recognition and derecognition ballots), **Phase Two (2027)** will allow pure electronic balloting to also be used in recognition and derecognition ballots once the following changes to legislation have been made: i. Amending Schedule A1 to the **1992 Act** to allow the CAC to request workplace email addresses for all workers in a bargaining unit from employers. ii. Adding to the list of unfair practices that parties are prohibited from engaging in during recognition and derecognition ballots (set out in Schedule A1 to the 1992 Act). See the Factsheet ***Trade Unions in the Employment Rights Act***.	Code of Practice – *closed 28 January 2026.* The consultation on e-balloting unfair practices- *closed 1 April 2026.*	
2027	Confidentiality clauses / Non-Disclosure Agreements (**NDAs**)	Section 24 of the Act bans clauses/non-disclosure agreements that seek to prevent **allegations or disclosures of information relating to work-related harassment or discrimination** (see our report here). These rules will mean that any confidentiality clauses in settlement agreements or other agreements that seek to prevent a worker speaking about an allegation of harassment or discrimination will be null and void. This is likely to have major implications for employers who will need to review and amend confidentiality wording in contracts, policies and settlement agreements and who may be less willing to settle as many harassment and discrimination claims in the future without confidentiality. However, the Government recognises that in some cases, both parties may genuinely wish for confidentiality about certain details. An amendment therefore gives the Secretary of State powers to: • set criteria for "excepted NDAs" in limited, legitimate circumstances; and • specify situations where disclosures will always be allowed, even if an "excepted NDA" exists. On 15 April 2026, the Government published a consultation seeking views on the conditions which need to be met for a non-disclosure agreement (**NDA**) to still be validly entered into ('excepted agreement') in cases of harassment and discrimination. For example: • that an NDA may be valid if requested in writing by the worker; • prior to entering into the agreement, the worker has received independent advice on the agreement;	On 15 April 2026 the government published a consultation on the misuse of non-disclosure agreements, - ***closing date 8 July 2026.***	

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		• there should be a cooling off period; • a written copy of the excepted agreement should be provided to all parties; • only for incidents which have already taken place. The consultation also looks at other issues, such as (1) Whether an excepted agreement should be time-limited, (2) The individuals or bodies who workers covered by an excepted agreement can speak to about the harassment and discrimination, irrespective of what their NDA says ('permitted disclosure'); and (3) Expanding the types of individuals the legislation applies to beyond the definitions of employee and worker used in the Employment Rights Act 1996, e.g. whether this include some types of self-employed individuals.		
2027	Expand the legal definition of "employment business" to include umbrella companies to enable them to be regulated	The Government wants to ensure that workers get comparable rights and protections when working through an umbrella company as they would when taken on directly by an employment business. The Act will expand the legal definition of "employment business" to include umbrella companies, bringing them within scope of the Employment Agency Standards Inspectorate's (and later, the FWA's) remit, allowing enforcement action to be taken against any umbrella companies that do not comply. The Government will consult on amending the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (**Conduct Regulations**) to ensure they are appropriate for application to umbrella companies and to address the main harms identified in the sector (e.g. lack of pay transparency and difficulty in enforcing employment rights and obligations). The new regulations will apply to the expanded definition of employment businesses. See the Factsheet ***Umbrella Companies***. ***NB: Outside of the Act, separate legislation that took effect in April 2026 has now moved the responsibility to account for PAYE from the umbrella company that employs the worker to the recruitment agency that supplies the worker to the end client. Where there's no agency in the supply chain, this responsibility now sits with the end client.***	Consultation published here on modernising the Agency Work Regulatory Framework to account for the activities of umbrella companies – *closed 1 May 2026.*	

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