

Date	What preparatory steps should employers be taking?	What legal changes are coming into force?
November 2025	<p>Review the EHRC's guidance on sexual harassment and your sexual harassment risk assessment. Consider what further reasonable steps could be taken to prevent sexual harassment. Devise a plan for full implementation of those steps by October 2026.</p> <p>Consider the circumstances in which your staff come into contact with third parties, the risk of discriminatory harassment by such third parties and what reasonable steps you could take to prevent such harassment. Devise a plan for full implementation of those steps by October 2026.</p> <p>Begin auditing your compliance with the areas of law to be enforced by the Fair Work Agency (to the extent that they apply to your business) and plan how to address any shortcomings.</p> <p>Consider ways of strengthening dialogue with staff about matters such as pay, benefits, working hours etc. to combat the risk of statutory recognition of a trade union.</p>	Nothing expected.
January 2026	<p>Update the following internal policies and guidance, ready to reflect the April 2026 reforms:</p> <ul style="list-style-type: none"> <li>• Sickness Absence policy</li> <li>• Redundancy policy and/or internal guidance on redundancies (if any)</li> <li>• Paternity Leave policy</li> <li>• Parental Leave policy</li> <li>• Whistleblowing policy and/or internal guidance (if any)</li> </ul>	Nothing expected.
March 2026	Remind your payroll team of the Statutory Sick Pay reforms ( <b>SSP</b> ) coming into force in April 2026.	Nothing expected.

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March 2026 (cont)	<p>Notify staff of forthcoming updates to the Sickness Absence, Redundancy, Paternity Leave, Parental Leave and Whistleblowing policies and guidance (as applicable).</p> <p>If you are in scope to publish an Equality Action Plan from 2027, consider whether you would wish to report on a voluntary basis in 2026. If so, begin collating information needed for the report on your gender pay gap and measures in place to support menopausal workers.</p> <p>Audit your employment terms and identify any terms requiring variation to meet your business needs. Where any such a variation would be "restricted" under the new fire and rehire rules (i.e. variation of terms relating to pay, pensions, working hours, timing or duration of shifts, a reduction in the amount of time off work and/ or the inclusion of a unilateral flexibility term), seek to make the variation before October 2026.</p>	Nothing expected.
April 2026		<ul style="list-style-type: none"> <li>• <b>SSP:</b> SSP payable from the first day of sickness (rather than the fourth) and the requirement for the employee to earn at least the lower earnings limit (currently £125 per week) will be removed.</li> <li>• <b>Collective redundancies:</b> Protective award for failure to collectively consult to rise from 90 to 180 days.</li> <li>• <b>Whistleblowing:</b> Sexual harassment to become a standalone category of whistleblowing malpractice.</li> <li>• <b>Paternity Leave:</b> (1) To become a Day 1 employment right; (2) May be taken after a period Shared Parental Leave without being lost.</li> <li>• <b>Parental Leave:</b> To become a Day 1 employment right.</li> <li>• <b>Trade union recognition:</b> (1) Percentage of workers in a proposed bargaining unit who must be trade union members before a union can apply for statutory recognition to be reduced from 10% to anywhere between 2% and 10%. <i>(subject to consultation)</i>;</li> </ul>

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April 2026 (cont)		<p>(2) To obtain recognition, a trade union will only need a simple majority of the votes cast to succeed (currently, they need the support of at least 40% of the workers in the proposed bargaining unit).</p> <ul style="list-style-type: none"> <li>• <b>Fair Work Agency (FWA):</b> To be established and have responsibility for enforcement of the following areas: National Minimum Wage; SSP; holiday pay; regulation of employment agencies and businesses; the unpaid Employment Tribunal financial penalties scheme; the licensing of gangmasters; section 1 of the Fraud Act 2006; and parts 1 and 2 of the Modern Slavery Act 2015 (<i>currently unclear when the FWA's enforcement powers will come into force</i>).</li> <li>• <b>Equality action plans:</b> Voluntary publication for employers with 250+ employees, and menopause guidance to be published.</li> </ul>
July 2026	<p>Remind managers and HR of the increased time limit for bringing Employment Tribunal claims from October 2026 and ensure that relevant documents are retained accordingly and not destroyed.</p> <p>Amend any template employment contracts to include wording about the employee's right to join a trade union.</p> <p>Ensure all reasonable steps to prevent sexual harassment have been taken. Update your Sexual Harassment policy accordingly.</p> <p>Ensure all reasonable steps to prevent discriminatory harassment by third parties have been taken. Update your Harassment policy accordingly.</p> <p>Notify staff of updates to Sexual Harassment and Harassment policies, and arrange training to ensure all employees are aware of expected standards of behaviour and how to report any concerns.</p>	Nothing expected.
September 2026	Ensure that any employees who may have missed harassment and sexual harassment training have now received it.	Nothing expected.

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October 2026		<ul style="list-style-type: none"> <li>• <b>Right to written statement of trade union rights:</b> Requirement to give workers a written statement advising that they have the right to join a trade union (to be given at the same time as providing their section 1 statement and at other prescribed times which are, as yet, unknown, but will need to be diarised and actioned accordingly) <i>(subject to consultation)</i>.</li> <li>• <b>Preventing sexual harassment:</b> Duty on employers to take <u>all</u> reasonable steps to prevent sexual harassment into force.</li> <li>• <b>Third party harassment:</b> Employers to become liable for discriminatory harassment of workers by third parties.</li> <li>• <b>Employment Tribunal claims:</b> Time limit to bring most Employment Tribunal claims to rise from three to six months (this change will take effect no earlier than October 2026).</li> <li>• <b>Tipping practices:</b> Requirement to consult about initial tips policy with union/worker representatives/workers and to further consult every three years <i>(subject to consultation)</i>.</li> </ul>
<b>November 2026</b>  <i>(Further action points to prepare for the 2027 changes will arise once the full details of those reforms and the implementation dates are known)</i>	<p>Audit your recruitment practices and consider additional steps you can take to limit the risk of a bad hire.</p> <p>Deliver training to line managers on how to manage performance and conduct issues.</p> <p>Review your contractual probationary period and consider aligning it with the new six-month qualifying period for unfair dismissal.</p> <p>Consider how you will track the number of redundancies across different sites within a rolling 90-day period.</p> <p>Benchmark your reasonable steps to prevent sexual harassment against new regulations.</p>	Nothing expected.

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<p><b>November 2026 (cont)</b></p> <p><i>(Further action points to prepare for the 2027 changes will arise once the full details of those reforms and the implementation dates are known)</i></p>	<p>If you are in scope to publish an Equality Action Plan from 2027, begin collating information needed for the report on your gender pay gap and measures in place to support menopausal workers.</p> <p>If you are in scope to publish gender pay information, audit your use of outsourced workers.</p> <p>Benchmark any existing Bereavement Leave policy against the new statutory right expected in 2027 (or, if none, create a new policy).</p> <p>Audit use of zero and low hours workers and consider alternative flexible workforce solutions.</p> <p>Where zero and low hours workers are used and regularly work in excess of their contracted hours, consider regularising the position before the new duty to offer a guaranteed hours contract comes into force.</p> <p>Update any confidentiality provisions in template documents (e.g. employment contracts and settlement agreements) to comply with new NDA restrictions.</p> <p>Audit holiday pay record-keeping practices to ensure compliance with forthcoming reform and address any shortcomings.</p> <p>Update any Parental Leave and Pregnancy and Maternity Leave policies and/or guidance ahead of new dismissal protections.</p>	<p>Nothing expected.</p>
<p><b>January 2027</b></p>		<ul style="list-style-type: none"> <li>• <b>Unfair dismissal:</b> Reduction of qualifying period to six months and removal of the cap on compensation (both the 52-week cap and the overall cap) into force.</li> <li>• <b>Fire and rehire:</b> Dismissal of an employee for refusing to agree a "restricted variation", or to replace them with a non-employee, to become automatically unfair (<i>subject to consultation</i>).</li> </ul>

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<p><b>In 2027</b></p> <p><i>(Likely to be split across April and October)</i></p>		<ul style="list-style-type: none"> <li>• <b>Collective redundancies:</b> Collective redundancy consultation to be triggered when a threshold number of redundancies across the business are proposed within a 90-day period (in addition to the existing trigger of 20+ redundancies at one establishment within a 90-day period <i>(subject to consultation)</i>).</li> <li>• <b>Pregnancy and family leave:</b> New dismissal protection during pregnancy and after family leave into force <i>(subject to consultation)</i>.</li> <li>• <b>Preventing sexual harassment:</b> New regulations may be published specifying reasonable steps for the purposes of duty to prevent sexual harassment <i>(not yet published)</i>.</li> <li>• <b>Equality action plans:</b> Compulsory publication for employers with 250+ employees.</li> <li>• <b>Gender pay gap:</b> Requirement for employers that are in scope to report their gender pay information to publish new information in relation to their use of outsourced workers.</li> <li>• <b>Flexible working:</b> Refusal of requests to be objectively reasonable <i>(subject to consultation)</i>.</li> <li>• <b>Bereavement leave:</b> Right to take bereavement leave into force <i>(subject to consultation)</i>.</li> <li>• <b>Zero and low hours:</b> (1) Duty to offer qualifying workers a guaranteed hours contract; (2) Duty to give qualifying workers reasonable notice of shifts and changes of shifts <i>(subject to consultation)</i>.</li> <li>• <b>Umbrella companies:</b> Definition and regulation of umbrella companies <i>(subject to consultation)</i>.</li> </ul>
Unclear		<ul style="list-style-type: none"> <li>• <b>NDAs:</b> Ban on using NDAs to restrict disclosures about discrimination or harassment <i>(subject to consultation)</i>.</li> <li>• <b>Holiday pay records:</b> Requirement to keep certain records relating to annual leave and pay for annual leave.</li> </ul>

\*This timetable does not cover the following aspects of the Act relating to trade unions, industrial action and certain sector-specific reforms.

- Repeal of the Strikes (Minimum Service Levels) Act 2023.
- Repeal of changes to public sector check off.
- Repeal of changes to facility time.
- Strengthening of blacklisting protection.
- Industrial action ballot reforms (turnout, support, provision of information, notice and duration).
- Electronic balloting.
- Union supervision of picketing.
- Protection against detriment and dismissal for taking industrial action.
- Trade union right of access to workplaces.
- Facilities for trade union officials and learning representatives.
- Time off and facilities for union equality representatives.
- Seafarers - collective redundancies.
- Seafarers - wages and working conditions.
- Public sector - outsourcing contracts protection for outsourced workers.
- Public sector - collective bargaining bodies.

Please contact us should you require advice on any of these reforms.