



Legislation Update

April 2026

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Foreword

When the Building Safety Act 2022 came into force, it brought about a transformative change to building safety regulations particularly for higher risk buildings (HRBs). Starting in October 2023, it created strong ongoing duties to manage risks for those responsible for existing HRBs and it introduced the Building Safety Regulator (BSR) as the building control authority for higher-risk building work. On 27 January 2026, the BSR was established as a standalone body under Regulations that moved it from under the HSE. Established in 2021 as a response to the Grenfell Tower tragedy, BSR is central to the government's building safety reforms. Since the Building Safety Act came about, there have been many legal duties introduced and amendments published, which makes it critical that dutyholders stay well informed of latest updates.

Established in 2021 as a response to the Grenfell Tower tragedy, the Building Safety Regulator (BSR) is central to the government's building safety reforms

Another recent landmark piece of legislation is the Employment Rights Act 2025, which received Royal Assent in December and introduces major reforms that will reshape the employment law landscape. The reforms will be phased in until 2027, and April 2026 is a significant month for measures under the Act, including new day one rights coming into force and a changing enforcement model. With these, and other upcoming changes coming into play, the message for employers remains staying on top of changes and adjusting and updating policies and training accordingly. April 2026 will see the creation of a new state enforcement body—the Fair Work Agency (FWA). The aim of the FWA is to bring the enforcement powers of several bodies under one roof. While many of its functions may not be new, employers should familiarise themselves with its remit to ensure compliance under the newer measures coming into force. In

February, the government updated its implementation timeline (detailed below), to help give workers, employers, and businesses visibility of the upcoming changes.

In early March, the Security Industry Authority (SIA) Executive Director for Martyn's Law offered a perspective on the regulatory progress of the statutory guidance due to be published to help organisations implement the new requirements. Reports have suggested the Home Office statutory guidance can be expected during the Summer of 2026 (instead of Spring 2026 as first suggested). Organisations are advised to use any extra time to establish which premises fall within scope, review emergency and security plans, and strengthen staff training.

Significant updates to several core ISO management system standards are underway and due from 2026 onwards, with the first being the revision to ISO 14001, the Environmental Management Systems (EMS) standard. The revision aims to bring clarity for users and is expected to be published in April 2026. Some of the changes made are editorial, while others expand existing concepts. In terms of leadership, ISO 14001 will require top management to now support all relevant roles and not just management positions, extending the level of personal involvement, responsibility and accountability. The premise of the 14001 revision is that organisations must demonstrate a deeper understanding of how they both influence and are influenced by environmental change. With more than 500,000 certifications in over 180 countries around the world, ISO 14001 plays an important part in providing a structure for a net zero roadmap and benchmarking progress toward achieving it. Organisations should familiarise with the proposed changes and ensure the relevant personnel understand the revisions and their implications.

Finally, workplace recycling obligations change in Wales from 6 April 2026. From this date, workplaces must separate any unwanted, small waste electrical items for onward recycling. And NHS and private hospitals will need to comply with wider recycling obligations from April 2026 too.

Health and Safety

REACH (Amendment) Regulations 2026

These Regulations apply to manufacturers and suppliers (including importers) of certain dangerous substances, specifically lead in projectiles. They came into force on 1 April 2026. Transition periods apply for the changes set out.

The Instrument makes amendments to UK REACH, which regulates chemicals in Great Britain (GB). The amendment to UK REACH made by this legislation adds further restrictions on the use and placing on the market of lead and its compounds to entry 63 of Annex 17.

The restriction:

- Prohibits the placing on the market and use of shot containing lead in a concentration equal to or greater than 1% by weight, after a three-year transition period. There is an exception allowing elite athletes to train with lead shot for the Olympic or Paralympic games.
- Prohibits the placing on the market and use of projectiles other than shot with a concentration of lead equal to or greater than 3% by weight. This will include large calibre bullets ($\geq 6.17\text{mm}$ / 0.243 calibre) for live quarry shooting and will apply after a transition period of three years. Small calibre bullets below that threshold are not included in the restriction.
- Includes the use of lead bullets for outdoor target shooting, but with a derogation allowing that use to continue at outdoor shooting ranges with appropriate risk management measures in place. Outdoor shooting ranges will have a two-year transition period to put in place such risk management measures.

There are also labelling requirements set out for projectiles other than shot which can continue to be placed on the market.

Chemicals (Health and Safety) (Amendment, Consequential and Transitional Provision) Regulations 2026—draft

These draft Regulations apply to manufacturers, downstream users, distributors (e.g. retailers), importers and exporters of hazardous chemicals and the general public. They are also relevant to authorisation holders of biocidal active substances and suppliers of approved biocidal products. They were laid on 24 February 2026.

The Instrument implements some of the changes that formed part of the HSE's public consultation on proposed reforms to chemicals legislation in Great Britain. The consultation covered the following HSE led chemicals policy areas:

- Biocides
- Classification, Labelling and Packaging (CLP)
- export and import of hazardous chemicals (Prior Informed Consent (PIC)).

This Instrument makes changes to the three EU regulations that were assimilated into domestic law by the Retained EU Law (Revocation and Reform) Act 2023 (the REUL Act) following EU Exit. It rectifies several issues that could not be addressed at EU Exit due to the nature of the legal powers in the European Union (Withdrawal) Act 2018.



Control of Mercury (Amendment) Regulations 2025

These Regulations, which came into force on 23 December 2025, apply to businesses, manufacturers, importers and users of mercury-added products.

They introduce new entries and phase-out dates for specific mercury-containing products and add to the list of mercury added products whose export, import and manufacture is already prohibited in Great Britain. These additional products will be phased out over the period 31 December 2025 to 31 December 2027.

The Regulations introduce new entries and phase-out dates for specific mercury-containing products

Ireland: Safety, Health and Welfare at Work (Exposure to Asbestos) (Amendment) Regulations 2025

These Regulations apply to various stakeholders in settings with asbestos, including employers, building owners, landlords, self-employed persons, and workers. They came into force on 21 December 2025.

The Regulations seek to strengthen protections for any workers who may be exposed to asbestos at work by setting more stringent exposure limits and strengthening preventive measures. They lower the maximum exposure limit value for asbestos exposure at work and update the methods for measuring asbestos.

The Regulations implement in Ireland Directive 2023/2668 of the European Parliament and of the Council of 22 November 2023:

- Setting out additional general measures relating to exposure to asbestos.
- Governing the measuring of samples for asbestos fibres.
- Introducing additional provisions for training of employees.
- Introducing additional provisions for gathering of data in regard to health surveillance involving exposure to asbestos.
- Setting out additional requirements in regard to the notification system for work involving a risk of exposure to asbestos.

The Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006 (the Principal Regulations) are amended.

The Code of Practice accompanying the Regulations has also been published, replacing the 2024 version.

Scotland: Investigation and Commencement of Repair (Scotland) Regulations 2026

This Statutory Instrument introduces new duties on social and private landlords to investigate reports of damp and mould and commence any required repairs within a set timescale, unless, for reasons beyond the control of the landlord, the landlord is unable to do so. The new duties are set to come into force on 6 October 2026.

This is the first set of regulations for the implementation of Awaab's Law, which came into force in England on 27 October 2025.

The Regulations aim to provide greater certainty to tenants and seek to reduce instances of long-term exposure to damp and mould, which can pose significant risks.

The Regulations amend the Housing (Scotland) Act 2006 and the Scottish Secure Tenants (Right to Repair) Regulations 2002 to introduce the new duties.

The 2006 Act is amended to:

add "the house is substantially free from damp and mould" to the repairing standard. It also amends section 13 to introduce a modified guidance-making power for the Scottish Ministers

- set out a private landlord's duties to investigate and commence repairs in relation to damp or mould.
- require the First-tier Tribunal to consider whether the landlord has complied with the new duties under section 14 when considering whether a landlord has complied with the repairing standard.

The 2002 Regulations are amended to:

- set out a social landlord's duties to investigate and commence qualifying repairs in relation to damp or mould.
- add new Regulation 8A(6), which provides that the landlord must ensure that following a qualifying repair, the house is substantially free from damp and mould, and so far as reasonably practicable, the house will continue to be substantially free from damp and mould
- add new Regulation 8A(7), (8), and (9) to make provision for when a social landlord cannot comply with these duties for reasons beyond their control – the landlord must inform the tenant in writing that the landlord cannot comply with the relevant duty, the reason why the landlord cannot comply, and the reasonable timescale within which the landlord is able to comply with the duty. They must also ensure that, until the landlord is able to comply with the duty, reasonable steps are taken where practicable to minimise the extent to which the house is affected by damp or mould.

Consequential changes are also made to the 2002 Regulations.

Health and Safety at Work etc. Act 1974 (Application outside Great Britain) (Variation) Order 2026

These Regulations apply to employers, self-employed persons, and employees working in specific offshore areas. They come into force on 6 April 2026.

The Health and Safety at Work etc. Act 1974 (Application Outside Great Britain) Order 20131 (AOGBO) extends the application of specified health and safety regulations to specified activities when they take place offshore.

This Statutory Instrument varies the AOGBO to extend the specified health and safety regulations to offshore hydrogen production. This is to ensure there is a suitable regulatory framework in place and that the HSE has appropriate powers to ensure that duty holders are managing health and safety risks appropriately, including by means of enforcement action where required.

Carbon Capture Utilisation and Storage and Offshore Hydrogen Production (Miscellaneous Amendments) Regulations 2026

These Regulations apply to operators of offshore installations, pipelines, and wells involved in carbon capture, utilisation, and storage (CCUS) and offshore hydrogen production. They come into force on 26 April 2026.

The Regulations support a fundamental purpose of the Health and Safety at Work etc. Act 1974 to secure the health, safety and welfare of persons at work. They also recognise the approach of the HSE, as a regulator, towards industries and technologies such as Carbon Capture Utilisation and Storage (CCUS) operations and offshore hydrogen production which have the potential to cause significant damage to people or the environment, to be regulated as major hazard risks.

The Regulations:

- Amend existing offshore installations and pipeline regulations to extend their scope to CCUS operations offshore and transport of CO₂ by pipeline, and offshore hydrogen production.
- Extend a requirement to provide appropriate transport, subsistence and accommodation to inspectors at offshore installations to offshore wind and marine energy facilities.
- Clarify who has the responsibility for reporting accidents or incidents at wells to the HSE.



Railways Bill

This Bill was introduced to Parliament on 5 November 2025. It is relevant to various stakeholders including ticketing platforms, rolling stock manufacturers and financiers, infrastructure and technology suppliers, and public bodies involved in rail operations and regulation.

The Bill makes provision about railways and railway services. It creates Great British Railways (GBR)—a new publicly owned company, which will be the directing mind taking responsibility for the railway infrastructure (e.g. tracks, bridges, tunnels and stations) and most passenger train services.

The new rail system that is established by the Bill is designed to better meet the needs and expectations of those who rely on it and support the government's growth agenda.

EU Toy Safety Regulation

The new EU Toy Safety Regulation ((EU) 2025/2509) was adopted in late 2025 and seeks to strengthen child protection by banning harmful chemicals (including PFAS, endocrine disruptors, and bisphenols) and introducing a mandatory Digital Product Passport (DPP) for all toys. It entered into force on 1 January 2026, with full application required by 1 August 2030.

Under the Regulation, substances will be banned from toys as soon as they are identified as hazardous, including chemicals that disrupt hormones, harm the lungs, cause skin allergies, or damage specific organs, with the ban also covering per- and polyfluoroalkyl substances (PFAS) and bisphenols. The new rules also strengthen the existing ban on substances that can cause cancer, genetic damage, or harm reproduction (carcinogenic, mutagenic or reprotoxic substances).

Before placing a toy on the market, manufacturers will have to carry out a safety assessment on all potential hazards – chemical, physical, mechanical, and electrical. The assessment will also have to test toys' flammability, hygiene, and radioactivity, and take children's specific vulnerabilities into account.

All toys must have a clearly visible DPP, showing compliance with the relevant safety rules. The DPP will contain key safety information, which will facilitate customs control and market surveillance. It will also offer consumers easy access to safety information and warnings, via a QR code, for example.



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Guidance

Martyn's Law—guidance expected

The Home Office will publish statutory guidance during the implementation period of the Terrorism (Protection of Premises) Act 2025 (Martyn's Law). The guidance will assist those responsible to understand the requirements set out in the legislation.

The Act requires the production of two separate pieces of statutory guidance: guidance for the public to understand how they might meet the requirements of the legislation; and operational guidance which will set out how the regulator will discharge its duties.

The SIA, as regulator, will issue guidance (known as Section 12 guidance) that will set out how it will operate as a regulator in more detail, including its approach to investigations and use of powers. At time of writing, the Home Office guidance is being finalised; once published, the SIA will share their guidance for consultation.

PD ISO/PAS 45007:2026 Occupational health and safety management—risks arising from climate change and climate change action—guidance for organisations

Climate change poses significant challenges to organisations worldwide, impacting not only the environment but also occupational health and safety (OH&S), meaning that it is important that organisations proactively address the OH&S challenges arising from climate change and climate change actions.

This BSI document (ISO/PAS 45007:2026) provides comprehensive guidance for organisations to manage these risks and opportunities effectively.

It is intended for all organisations, whether or not they have implemented informal or formal OH&S management system such as ISO 45001. Such a management system includes the relevant elements of a Plan-Do-Check-Act (PDCA) system. Taking a systems approach facilitates the coordination of resources and efforts, which is important in managing climate change.

This document aims to assist organisations to better understand the impacts of climate change and climate change actions on OH&S and to create resilient and sustainable work environments that protect the health and safety of workers.

BS 30480:2025 Suicide and the workplace—intervention, prevention and support for people affected by suicide—guide

This is the UK's first standard dedicated to suicide in workplace contexts. It provides comprehensive, principles-based guidance to help organisations plan for, respond to, and support people affected by suicide.

The Standard has been developed on the consensus of a large group of stakeholders from government, charities and industry sectors, to reduce stigma, raise awareness, and enable employers to take effective and responsible action across prevention, intervention, and support for people affected by suicide.

BS 30480:2025 is intended for all organisations, regardless of size, sector, or type.

The Standard provides guidance on:

- Policies and practices to identify and manage suicide risk within workplace settings.

The regulations require that landlords have the electrics in their rented properties checked at least every five years by a properly qualified person

- Intervention processes to respond appropriately when someone is experiencing thoughts of suicide or suicide behaviours.
- Support for those affected by suicide (postvention): including colleagues, families, service users, customers, contractors, and others who may be impacted.
- Sensitive communication with people directly or indirectly affected, ensuring compassion and reducing stigma.
- Monitoring and review systems to ensure effectiveness and adapt approaches over time.
- When and where to seek specialist advice beyond the workplace context.

Electrical safety standards in the private and social rented sectors: guidance

This guidance sets out how electrical safety standards regulations for the private and social rented sectors affect landlords, tenants and local authorities.

The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 were updated in 2025 to include the social rented sector: Electrical Safety Standards in the Private Rented Sector (England) (Amendment) (Extension to the Social Rented Sector) Regulations 2025. The regulations came into force for the social rented sector on 1 November 2025 and will apply to social housing tenancies granted after 1 December 2025.

The regulations require that landlords have the electrics in their rented properties checked at least every five years by a properly qualified person. Social landlords who provide electrical equipment must also have this tested. Landlords must give their tenants proof of that they have had installations and equipment inspected, tested and checked.

Consultations

Legislative and guidance proposals for the Control of Asbestos Regulations 2012

The HSE launched a consultation in November 2025 on proposals to improve the application of the Control of Asbestos Regulations and guidance around asbestos management to help protect workers and building users.

The consultation is intended for all those engaged in the asbestos regulatory system—in particular dutyholders, asbestos analysts, asbestos removal contractors (including licensed) and asbestos surveyors. It is also relevant to associated professions, including facilities management and construction. Certain proposals, however, may apply more specifically to particular roles than to others.

There are three proposals put forward:

- Regulatory:
 - amending the Control of Asbestos Regulations 2012 and associated guidance.
- Non-regulatory:
 - improving the standard of asbestos surveys by improving guidance and other interventions
 - improving guidance and other interventions to clarify the type of work that constitutes work with asbestos (known as Notifiable Non-Licensed Work (NNLW)).

The consultation closed on 9 January 2026.

Draft BS ISO 45008 Occupational health and safety management—guidelines for remote working

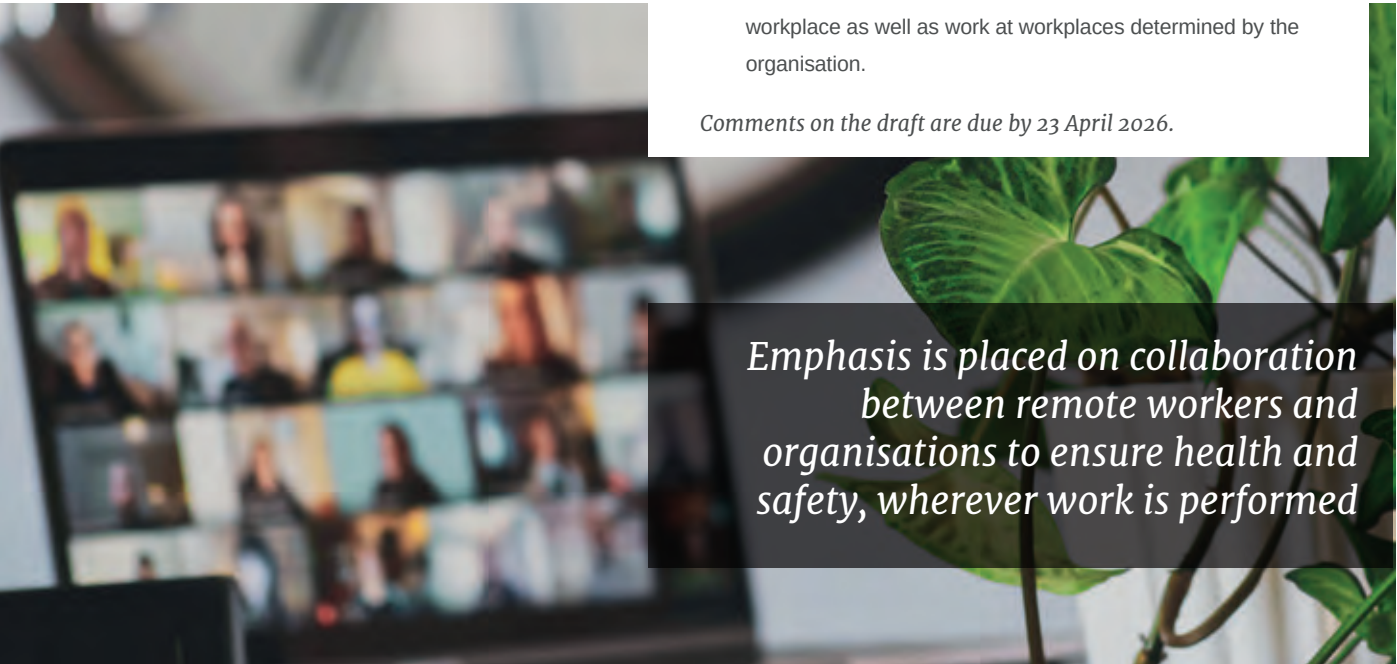
This draft British Standard gives guidelines for an organisation to manage the health, safety, and well-being at work of remote workers. It recognises that remote working is a growing and evolving form of work that is performed in workplaces not under the direct control of the organisation. These can include the remote worker's home, isolated external sites, sites controlled by other organizations, or private homes where services are delivered.

The guidance aims to support organisations in meeting their responsibilities by providing practical guidance for assessing, preventing, and responding to OH&S risks in diverse remote working situations. Emphasis is placed on collaboration between remote workers and organisations, shared responsibility, and the development of competence to ensure health and safety wherever work is performed.

This draft Standard:

- Gives guidelines for an organisation to manage the health, safety, and well-being at work of remote workers.
- Is applicable to any organisation regardless of its size, type and activities. It can be used independently or as part of a OH&S management system, including those based on ISO 45001.
- Covers work that is performed at workplace(s) not under the direct control of the organisation.
- Includes work for which the remote worker selects the work workplace as well as work at workplaces determined by the organisation.

Comments on the draft are due by 23 April 2026.



Emphasis is placed on collaboration between remote workers and organisations to ensure health and safety, wherever work is performed

Machinery safety legislation: call for evidence—government response

The Office for Product Safety and Standards (OPSS) issued a consultation between July and October 2025, inviting comments on the introduction across the UK of measures in the EU Machinery Regulation 2023/1230.

EU Machinery Regulation 2023/1230 applies in the EU from January 2027, bringing in changes intended to clarify and future-proof the legislation in this area, including the creation of common specifications, a move to paperless documentation, and obligations on all actors in the supply chain. The government is considering whether to introduce these measures across the UK.

Views were sought on the issues associated with the continued recognition of new EU product requirements for machinery, and the implementation of the same approach.

There was strong support for the continued recognition of CE marking and alignment of approach. Accordingly, the government intends to lay legislation to continue CE recognition for machinery products in Great Britain and update the Supply of Machinery (Safety) Regulations 2008 as they apply in Great Britain to introduce similar measures to the EU.

Restricting PFAS in firefighting foams

In August 2025, the HSE launched a six-month consultation inviting views on per- and polyfluoroalkyl substances (PFAS) in firefighting foams (FFFs).

PFAS are persistent chemicals covering thousands of substances used across many industrial sectors. The consultation focused solely on PFAS in FFFs and did not cover other PFAS uses or legacy contamination.

Providing an opportunity for those who use foams from industry, and other stakeholders, such as trade associations, to comment on the proposals, the consultation was held before the opinions are made and sent to the Defra Secretary of State, and the Scottish and Welsh Governments for a decision on whether to bring a restriction into law.

An assessment and a proposed restriction were set out in a detailed document called an 'Annex 15' report. The report examines the risks PFAS in FFF may pose to human health and the environment and suggests measures to reduce those risks.

The consultation invited comments on the proposed restriction on the placing on the market and use of PFAS in FFF, along with any relevant evidence or information. It closed on 18 February 2026.



The government issued a series of consultations supporting the Road Safety Strategy

Road Safety Strategy—various consultations launched

In January 2026, the Department for Transport published its Road Safety Strategy which presents a plan to reduce deaths and serious injuries on Britain's roads by 65% by 2035.

The government issued a series of consultations supporting this, proposing:

- changes to motoring offences
- mandating vehicle safety technologies in GB type approval
- mandatory eyesight testing for those over 70
- minimum learning period for learner drivers
- reviewing the law for powered mobility devices
- reforms to motorcycle training, testing and licensing.

Northern Ireland: Proposals for amendments to the Gas Safety (Installation and Use) Regulations (Northern Ireland) 2004

The HSENI launched a consultation document containing amendment proposals to revise the Gas Safety (Installation and Use) Regulations (Northern Ireland) 2004 (GSIUR).

The GSIUR make provisions in respect of the installation and use of gas fittings for the purpose of protecting the public from dangers arising from the distribution, supply or use of gas.

Views were sought, among other things, on:

- Introducing flexibility in the timing of landlords' annual gas safety checks.
- Clarifying that only gas safety defects should be recorded.
- Disapplication for compressed natural gas (CNG) filling stations fed by a dedicated metered gas supply from the majority of the requirements of GSIUR, bringing them in line with other industrial premises.

The HSENI published its response to the consultation following its conclusion in February 2026.

Developing the automated vehicles regulatory framework

The government issued a call for evidence on several sections of the Automated Vehicles Act 2024 (the AV Act) to support development of the regulatory framework. This framework will include rules, guidance and principles. The exercise also sought to develop understanding around accessibility, environmental and cost-benefit considerations.

Views were sought on several aspects of the automated vehicles regulatory framework, including:

- type approval
- authorisation, user-in-charge and transition demands
- no-user-in-charge operator licensing
- insurance
- data collection
- cyber security
- in-use regulation
- monetary penalties
- incident investigation.

The call for evidence closed on 5 March 2026.



The government issued a call for evidence on several sections of the Automated Vehicles Act 2024

Building and Fire Safety

Building Safety Regulator (Establishment of New Body and Transfer of Functions etc.) Regulations 2026

These Regulations came into force on 27 January 2026 and apply to the governance and operation of the Building Safety Regulator (BSR). They are relevant to the broader building industry, including building control professionals, and building owners.

The Regulations establish the Building Safety Regulator (BSR), transferring BSR functions from the HSE.

The transfer of functions aims to strengthen lines of accountability and give a dedicated focus to BSR operations. It signifies an important first step towards establishing a single construction regulator—the lead recommendation of the Grenfell Tower Inquiry Phase 2 report.

Building Safety Levy (England) Regulations 2025

These Regulations apply to developers, local authorities, and Registered Building Control Approvers. They came into force on 1 October 2025.

The Regulations impose the the building safety levy (the levy) and make provision for the levy to be charged on specified applications for building control approval made on or after 1 October 2026. Local authorities are designated as collection agency for the levy, and both the process for collection and the consequences of failing to pay are set out.

The levy forms part of a package of measures brought forward after the Grenfell Tower fire in 2017 to fund the remediation of building safety defects in residential buildings. The Regulations set out the levy rate per metre squared of floorspace in new residential development in each local authority in England.

In order to ensure the levy operates effectively as part of the building control process, these Regulations make amendments to the Building Regulations 2010, the Building (Registered Building Control Approvers etc.) (England) Regulations 2024, and the Building (Higher-Risk Buildings Procedures) (England) Regulations 2023.



Fire Safety (Residential Evacuation Plans) (England) Regulations 2025

These Regulations apply to Responsible Persons (RPs) who are typically building owners or managers and are defined under Article 3 of the Regulatory Reform (Fire Safety) Order 2005 (the Fire Safety Order). These Regulations come into force on 6 April 2026.

They aim to support the fire safety of “relevant residents” of specified residential buildings. These are residents whose only or principal residence is the domestic premises in which they reside, and whose ability to evacuate the building without assistance in the event of a fire is compromised as a result of a cognitive or physical impairment or condition.

The Instrument applies to high-rise residential buildings (these are residential buildings that are at least 18 metres above ground level or have at least seven storeys) and residential buildings over 11 metres in height that have simultaneous evacuation strategies in place. New duties are imposed on Responsible Persons (RPs) of such buildings.

Amongst other things, the new duties aim to improve the safety of relevant residents by requiring the RP to identify and engage them in order to:

- Conduct person-centred fire risk assessments (where one is requested).
- Consider potential fire safety measures to implement.
- Record and provide the resident with a statement, that is a written record of what the resident has agreed to do in the case of a fire.

Wales: Building (Higher-Risk Buildings Procedures) (Wales) Regulations 2025

These Regulations apply to stakeholders including the client, the principal contractor (or sole contractor) and the principal designer (or sole or lead designer) and any other person appointed in relation to the HRB work. They come into force on 1 July 2026.

The Regulations are part of a set implementing the Building Safety Act 2022 in Wales in respect of higher-risk buildings (HRBs). The meaning of HRB work for the purposes of these Regulations is set out, including the construction of new HRBs as well as work to an existing building that causes it to become higher-risk.

Provisions set out by the Regulations include those relating to:

- Procedures for applying for building control approval in relation to HRBs.
- The change control process where any document relating to the work which was approved by the building control authority at the application stage (or subsequently under a requirement or a controlled change) is to be changed.
- The golden thread information, mandatory occurrence reporting and the handover of information on completion of the work.
- Procedures for applying for completion certificates and partial completion certificates in relation to higher-risk buildings.

Wales: Building etc. (Amendment) (No. 2) (Wales) Regulations 2025

Coming into force on 1 July 2026, these Regulations apply to a range of stakeholders, including designers, contractors, and people who have building work carried out (clients), local authorities, registered building control approvers, and fire safety enforcing authorities.

They are part of a set of Regulations that implement Part 3 of the Building Safety Act 2022, which addresses the new building control regime and how the regulatory regime will regulate higher-risk buildings.

Key provisions introduced by these Regulations include:

- Those around new roles and responsibilities for those involved in building work, ensuring that individuals are competent and accountable.
- Clients must ensure they appoint competent designers and contractors—designers and contractors must demonstrate competence and cooperate throughout the project lifecycle.
- The replacement of the “deposit of plans” system with a new application-based process for building control approval.
- Stronger requirements for the provision and acknowledgment of fire safety information. The responsible person must confirm receipt and that the information is sufficient.



Building (Higher-Risk Buildings Procedures) (Wales) Regulations 2025 apply to stakeholders appointed in relation to the HRB work

Wales: Building etc. (Amendment) (Wales) Regulations 2026

These Regulations apply to dutyholders including clients, designers, and contractors involved in building work in Wales. There are various coming into force dates, namely as follows:

- Regulations 1, 2, 5, 6, 7 and 8(3) on 1 July 2026
- Regulation 4 at 12:01 am on 1 July 2026
- Regulations 3, 8(1), 8(2) and 8(4) on 4 March 2027.

This Statutory Instrument makes amendments to the following:

- Building Regulations 2010 (the 2010 Regulations) as they apply in relation to Wales.
- Building (Registered Building Control Approvers etc.) (Wales) Regulations 2024.
- Building (Restricted Activities and Functions) (Wales) Regulations 2024.

The amendments relate to areas including energy efficiency requirements and new notice requirements.

Wales: Building Safety Bill

This Bill applies to those who own and manage certain residential buildings in Wales, to residents of such buildings, and to local

authorities and fire and rescue authorities in terms of enforcement. It was introduced on 7 July 2025.

The main purpose of the Bill is to improve the safety of people living in multi-occupied residential buildings in Wales.

It establishes a comprehensive new building safety regime for residents of shared buildings across Wales, regardless of building height or tenure. Three core principles underpin the Bill:

- **Safety:** the Bill requires that fire risk assessments are carried out only by competent persons, with criminal penalties for those who do not comply—directly addressing a concern raised by the Grenfell Tower Inquiry.
- **Accountability:** the legislation establishes clear legal responsibilities for those who manage buildings, ending any confusion about who is answerable for building safety risks.
- **Resident voice:** the Bill empowers residents with clear routes of redress and a stronger say in matters affecting their homes, with appropriate responsibilities for residents supported by guidance to help them contribute to a safer living environment.

The Senedd passed the Building Safety (Wales) Bill on 10 March 2026.

At time of writing, it is in Post Stage 4 in the Senedd, awaiting Royal Assent, which is typically a four-week period.

The main purpose of the Bill is to improve the safety of people living in multi-occupied residential buildings in Wales



Construction Products (Amendment) Regulations 2025

These Regulations apply to a range of stakeholders involved with construction products in Great Britain, including manufacturers, suppliers and importers, authorised representatives, contractors, and installers. They came into force on 8 January 2026.

They aim to ensure continuity of the policy so that construction products can be placed on the market in Great Britain where they comply with the EU's Construction Products Regulation 2024 (EU-CPR 2024), without the need for additional testing or documentation. Without the amendments made by these Regulations, construction products assessed to the EU-CPR 2024 standards would need additional testing and marking to be placed on the market in Great Britain. This would create double regulation, creating barriers to trade and potential supply chain disruptions which could impact house building and infrastructure projects.

The Regulations therefore facilitate the ongoing recognition of construction products with the CE marking or CE marking accompanied by the UK(NI) indication, by amending the 2011 Regulation (Council Directive 89/106/EEC (EUR 2011/305)) to recognise compliance with EU-CPR 2024 rules.

Building Safety (Responsible Actors Scheme and Prohibitions) (Amendment) Regulations 2026

These Draft Regulations were laid on 10 February 2026 and apply to building control professionals. They make technical amendments to the Building Safety (Responsible Actors Scheme and Prohibitions) Regulations 2023 (the RAS Regulations).

The RAS Regulations established a scheme under which relevant residential developers needed to join the Responsible Actors Scheme and identify and remediate relevant potentially unsafe buildings, or face being subject to building control and planning prohibitions, which would involve significant commercial consequences for them, and entities they control.

These Regulations primarily correct technical drafting issues in relation to the building control prohibition. The main practical purpose of the Instrument is to ensure that exceptions to the building control prohibition (which are designed to mitigate against the risk of the prohibition having adverse impacts on third parties) work effectively, and are clear for the building control professionals who will need to operate them.

The key changes made are:

- Ensuring the main building control prohibition in Regulation 33 is clear.

This new framework from BSI is designed to strengthen product safety and support regulatory reform across the built environment sector

- Enabling emergency repair work done under Regulation 34 to receive a completion certificate.
- Ensuring that the Regulation 35 exception for occupied buildings works as intended.
- Extending the ability to apply for the Regulation 36 exception.
- Correcting drafting defects.

Guidance: PAS 2000, Construction products—bringing safe products to market—code of practice

This new framework from BSI is designed to strengthen product safety and support regulatory reform across the built environment sector, following a recommendation that came out of the Grenfell Inquiry.

It sets a practical framework for construction product manufacturers to adopt to demonstrate that they have taken reasonable steps to best ensure the products they place on the market are safe for their intended use.

The code of practice was developed following recommendations in the Morrell/Day Testing for a Safer Future report and the Grenfell Tower Inquiry final report. It also responds directly to the UK government's programme of construction product regulatory reform.

Aligning with Recommendation 3.3 of the Morrell/Day Review, which called for industry collaboration with BSI to produce guidance, the standard illustrates the due diligence expected when placing a construction product on the market.

The PAS aims to help organisations demonstrate robust product safety governance, embed clear and proportionate due diligence processes, improve transparency and accountability, and align with evolving regulatory expectations. It is designed to strengthen confidence across supply chains that products will be safe for their intended use.

Guidance: Residential PEEPs: guidance for Responsible Persons

The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 (the Regulations—as detailed above) come into force on 6 April 2026 and enact the Residential PEEPs proposals put forward in the government response to the EEIS+ consultation published on 2 December 2024.

Under the regulations, residents with disabilities or impairments will be provided with a person-centred fire risk assessment to identify necessary equipment and adjustments to aid their fire safety and evacuation and a 'Residential PEEPs statement' that records what they should do in the event of a fire.

This guidance provides an explanation of the responsible persons (RP) legal responsibilities under the Regulations, advises on how the RP can meet these responsibilities, and outlines considerations the RP will wish to be mindful of, and the role of residents and local Fire and Rescue Authorities regarding these Regulations.

The Regulations apply to premises in England, and the guidance is relevant to any RP with duties in respect of such premises.

Report: Grenfell Tower Inquiry government annual report: February 2026

In February, the government published an annual report on progress made in implementing the Grenfell Tower Inquiry's Phase 2 recommendations. It also updates on Phase 1 recommendations related to Personal Emergency Evacuation Plans (PEEPs).

Key progress and developments in 2025 covered by the report relate to:

- Strengthening the building and fire safety system.
- Driving system-wide reform through clearer rules and expectations.
- Raising competence and capability across the built environment.
- Improving accountability and strengthening enforcement.
- Supporting residents and placing their voices at the centre.
- Accelerating remediation and improving support for those living in affected buildings.
- Building national resilience and improving emergency preparedness.

In terms of PEEPs, the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 mandates Residential PEEPs and applies to all high-rise residential buildings and medium-rise residential buildings with simultaneous evacuation strategies in place. The Residential PEEPs: Guidance for Responsible Persons (as detailed above) was published in December 2025.



Consultations

Draft BS 9990 Non-automatic firefighting systems in buildings—code of practice

This draft British Standard gives recommendations for non-automatic firefighting systems, such as wet and dry fire mains, in buildings. It covers good practice in matters affecting the design, installation, testing and maintenance of such systems.

This British Standard does not cover hose reels, foam inlets, automatic foam systems and portable firefighting equipment.

This British Standard will supersede and replace BS 9990:2015.

Changes introduced include the following:

- The number of landing valve / outlets per fire main at each floor level has been increased from one to two.
- The nominal diameter of dry fire mains pipework has been increased to 150 mm in non-residential buildings above 18 m.
- More appropriate K-values have been applied to firefighting branches, to assist with fire service hose and nozzle configurations.

The consultation closed on 5 April 2026.

BSI announces fire safety standard open for consultation—BS 750

The British Standards Institute (BSI) issued the draft for the standard covering requirements for underground fire hydrants for comment in February. This, it says, marks an important step in responding to Recommendation 40 of the Grenfell Tower Inquiry Phase 2 report.

Underground fire hydrants. Surface box frames and covers. Specification (BS 750) specifies areas including surface box frames and covers, ensuring they are designed, manufactured and tested to deliver reliable performance. The standard is designed to provide a consistent technical framework for manufacturers, water companies and fire and rescue services, supporting durability, compatibility and effective operation.

By setting clear specifications and performance criteria, BS 750 aims to help maintain dependable hydrant infrastructure that is essential for public safety and effective emergency response across the UK.

The revised document is intended to provide greater clarity and strengthened requirements within the standard. The proposed amendment aims to improve clarity in definitions and figures to ensure that the measurement of the flow coefficient is clearly described, in



line with the Grenfell Tower Inquiry recommendation, as published in September 2024. It also strengthens requirements for third-party verification and certification, alongside enhanced technical specifications designed to support greater consistency, transparency and accountability across the industry.

The consultation process encourages stakeholders to respond by 13 April 2026.

PAS 9970-1:2026 Fire safety in construction—organisation and site fire safety—code of practice

This part of PAS 9970 applies to construction work conducted on construction sites that:

- are scheduled to last longer than 30 working days and employ more than 20 people working simultaneously at any point, or
- are scheduled to exceed 500 working days in total.

BSI issued this draft for comment. The document provides recommendations and guidance on strategic fire safety practices for construction contractors. This includes the development and implementation of proportionate fire safety management systems to suitably and sufficiently manage organisational and site-specific fire safety risks.

Comments were invited until 18 March 2026.

PAS 9970-2:2026 Fire safety in construction—design and installation of temporary fire alarm systems—specification

Issued for comment, this draft part of PAS 9970 specifies requirements and performance criteria for life-critical fire detection and fire alarm system (FDAS) products intended to be deployed in temporary installations during construction work.

This part of PAS 9970 is intended for use by manufacturers, suppliers and system specifiers. It might be of interest to installers and construction site managers responsible for fire safety.

Comments were invited until 18 March 2026.

Construction Products Reform White Paper

Views are being sought on a package of proposals for reform of the construction products regime.

In February 2025, the government published and consulted on the Construction Products Reform Green Paper. This White Paper is the next step in the response to the urgent need for reform across our construction products regime.

This consultation seeks views on a package of proposals for reform of the construction products regime. Responsibilities associated with the use or running of buildings or infrastructure are out of scope. It has been published alongside supporting documents.

Reforms will seek to establish a clear, predictable and proportionate regulatory framework that provides long-term stability, supporting a competitive, competent and confident construction products sector.

Comments must be sent by 20 May 2026.

General safety requirement for construction products

The government is seeking views on proposals to introduce a general safety requirement (GSR) for construction products that are not regulated.

Regulations will require that construction products placed on the market are safe and will place specific obligations on businesses. The regulations will also provide enforcement powers to the national regulator for construction products.

This consultation complements the reforms to construction products regulation detailed in the white paper and sets out the introduction of a proportionate risk-based GSR which will operate alongside UK construction products regulation and require that construction products placed on the UK market are safe.

The current regime only applies to products covered by designated standards or voluntary technical assessments, creating a regulatory gap that contributed to the systemic safety failures identified by the Grenfell Tower Inquiry. The GSR will address this gap by operating alongside existing UK construction products regulations, bringing all products into the regulatory regime.

Comments must be sent by 20 May 2026.



The consultation seeks views on a package of proposals for reform of the construction products regime

Scotland: Scottish building regulations: fire safety review and compliance—call for evidence

The Scottish Government issued a consultation on a review of building standards and guidance relating to fire safety, and including work on the compliance plan approach, to help ensure the safety of people in and around Scotland's buildings.

The consultation covered three main areas:

- the Grenfell Tower Inquiry Phase 2 Report recommendations on fire safety, including a fundamental review of Section 2 (Fire) of the Technical Handbooks
- the compliance plan manager
- the compliance plan approach.

The closing date is 10 April 2026.

Review of Approved Document B: Fire Safety

The HSE has issued a consultation to gather feedback on proposed amendments to Approved Document B: Fire Safety.

The amendments propose to:

- Undertake small but important clarifications and technical changes to the guidance within Approved Document B.
- Consolidate guidance for designing building work on existing buildings.
- Introduce a threshold whereby the guidance within Approved Document B should not be applied when combustible elements of structure are used.
- Revise and update guidance on external wall systems and balconies and review the scope of the ban on combustible materials in and on external walls.
- Recommend the provision of evacuation lifts in residential buildings above 18m and clarify the guidance for non-residential buildings.
- Update terminology on 'sheltered housing', introducing the new term 'specialised housing' in its place and include provisions for alarm coverage in these building types to be a minimum of Category LD1.
- Introduce updated guidance on roofs, including new provisions for the incorporation of photovoltaic (PV) panels.
- Increase in the fire resistance rating of open-sided car parks.

The consultation, which applies to England only, closes on 17 June 2026.

Both prior to and following the Grenfell Tower tragedy work has been undertaken by the fire safety sector to strengthen the profession

Fire risk assessors profession

The government issued a consultation seeking views on the future of the fire risk assessor profession. It covers the following areas:

- the future development of the fire risk assessor profession
- the powers needed to regulate the fire risk assessor profession
- implementation approaches for competency requirements in the fire risk assessor profession.

For non-domestic premises including the common parts of blocks of flats, Responsible Persons (RPs) are under a duty to make a suitable and sufficient fire risk assessment to identify general fire precautions. RPs can currently undertake this assessment themselves, and they may appoint someone, known as a Fire Risk Assessor (FRA), to assist them in doing so.

The consultation explains that FRAs are not a regulated profession, lacking common definitions, structures and career pathways. Concerns about the conduct of fire risk assessments have been raised over the last two decades, including following major fires.

Both prior to and following the Grenfell Tower tragedy work has been undertaken by the fire safety sector to strengthen the profession, including the publication in 2025 of British Standard BS 8674 which sets out the skills, knowledge, experience and behaviours that industry considers FRAs should possess.

The proposals presented in this consultation identify opportunities to go further in ensuring the best possible public safety outcomes.

The consultation sets out proposals relating to:

- defining the role of FRAs
- considering the RP's ability to conduct their own assessments
- developing competency frameworks and standards
- establishing clear career pathways
- providing appropriate regulatory powers
- ensuring effective implementation of measures introduced.

The findings from the consultation will inform legislation when parliamentary time allows. The closing date for comment is 18 June 2026.

EFM and Employment Law

Building Regulations etc. (Amendment) (England) Regulations 2026

The Regulations make amendments to the Building Regulations 2010 (the 2010 Regulations) to implement the Future Homes and Buildings Standards. The Future Homes and Buildings Standards will ensure that new homes and non-domestic buildings are built with low carbon heating and high levels of energy efficiency, so that buildings constructed to these standards will not require retrofitting to become zero carbon in use as the electricity grid decarbonises.

The Regulations amend the 2010 Regulations to:

- Create a new functional requirement (L3) for the provision of a system of on-site renewable electricity generation for new dwellings and buildings containing dwellings.
- Amend Part L of Schedule 1 to reflect the dual aims of reducing greenhouse gas emissions and conserving energy.
- Amend the definition of “fixed building services” so that it includes lifts, escalators and moving footways in new buildings other than in individual dwellings.
- Introduce Regulation 40C to require provision of information to homeowners of new dwellings in an appropriate format.

The Regulations also make an associated amendment to the Building (Registered Building Control Approvers etc.) (England) Regulations 2024 so that registered building control approvers have functions in relation to new Regulation 40C.

The Regulations revoke earlier transitional arrangements made in 2013 and related arrangements made in 2021, which enabled construction to 2010 energy efficiency standards—in each case subject to some exceptions.

The Regulations come into force on 27 March 2027, except Regulations 3, 4, 6, 7, 8 and 9 which come into force for higher-risk building (HRB) work and work to an existing HRB on 24 September 2027.

Scotland: Energy Performance of Buildings (Scotland) Regulations 2025

These Regulations reform the operation of the Energy Performance Certificate (EPC) system and EPC assessor market in Scotland. They will come into force on 31 October 2026. From this date the existing Energy Performance of Buildings (Scotland) Regulations 2008 (the 2008 Regulations) will be revoked. All Energy Performance Certificates



(EPCs) issued under the 2008 Regulations will become invalid, subject to specific transitional arrangements.

The main changes introduced by the 2025 Regulations include:

- EPCs are better aligned to net zero objectives, giving better information to current and prospective property owners and tenants.
- Consumers receive more up-to-date information through EPCs which have a five-year instead of 10-year validity period, to more accurately reflect a property's transition on the journey to net zero.
- Life-expired systems are replaced through adopting updated calculation methodologies and infrastructure shared with the UK Government.
- EPCs are carried out to the highest standard through the introduction of enhanced quality assurance and oversight requirements for EPC assessors and Approved Organisations, including the creation of new onsite audit and inspection functions, thus maintaining alignment with the EU's own enhanced audit requirements in the 2024 recast of the Energy Performance of Buildings Directive (EPBD).

The purpose of reforming the system is to provide clearer and more comprehensive information including details of the energy efficiency of buildings, the type, and performance of a building's heating systems, and the running costs.

Employment Rights Act 2025

This Act is far reaching and applies to businesses, employers and employees in a wide range of sectors, and to trade unions and employer representatives.

It received Royal Assent on 18 December 2025. The employment law changes included in the Act will take place over a period of two years. Most changes will happen in 2026 and 2027. Common commencement dates will be used to commence the majority of regulations laid using the powers provided for in the Act (6 April and 1 October).

The Act will introduce additions and amendments to existing legislation, including the Employment Rights Act 1996, the Equality Act 2010 and the Working Time Regulations 1998.

The Act introduces 28 major employment reforms, including:

- day one paternity leave and parental leave
- unfair dismissal protection from six months
- restrictions on fire and rehire
- additional obligations around zero-hours contracts
- stronger protections against harassment.

Changes coming into force in April 2026 are:

- New national minimum wage rates—1 April 2026.
- Gender pay gap reports and action plans—reporting deadline is 30 March 2026 for public sector employers and 4 April 2026 for the private or voluntary sectors; 3 April if not working on a Saturday.

- Increased statutory rates (maternity, sickness, redundancy, etc)—5 April 2026.
- Statutory paternity leave and parental leave from day one—6 April 2026.
- Day-one statutory sick pay and extended eligibility—6 April 2026.
- Collective redundancy protective award—6 April 2026.
- Trade union recognition—6 April 2026.
- Sexual harassment added to whistleblowing protections—6 April 2026.
- Employment tribunal awards—6 April 2026.
- Fair Work Agency—7 April 2026.

Employers and employees should also be aware of the **government's timeframe for implementation** and the relevant consultations—see sections below.

Employment Rights Act 2025 (Commencement No. 1 and Transitional and Saving Provisions) Regulations 2026

These Regulations apply to businesses, employers and employees in a wide range of sectors, and to trade unions and employer representatives. They were made on 5 January 2026 and set out commencement dates for certain parts of the Employment Rights Act 2025.

The commencement dates are 6 January 2026, 18 February 2026 and 6 April 2026. These are the first commencement Regulations made under the 2025 Act.



The Employment Rights Act introduces 28 major employment reforms

Cyber Security and Resilience (Network and Information Systems) Bill

Introduced to Parliament on 12 December 2025, this Bill applies to essential and digital services like healthcare, energy and transport, and brings into scope managed service providers and data centre operators, and providers of IT services like IT management, IT help desk support and cyber security.

It updates the UK's only cross-sector cyber regulations, the Network and Information Systems Regulations 2018 (NIS Regulations), as well as delivering new powers to ensure the government can respond to new and emerging cyber threats.

The Bill will update the NIS Regulations by bringing more entities into their scope and equipping regulators with proportionate powers to better fulfil their duties. The Bill will provide the government with powers to amend and add to the NIS Regulations in the future and respond to imminent and actual threats to UK national security.

These reforms are intended to better protect the services and other activities that are essential to the day-to-day functioning of society in the UK, and the economy, through safeguarding relevant network and information systems (the systems that allow computers and other devices to communicate with each other) and their surrounding environment.

Guidance: Employment Rights Act 2025—overview factsheet

The government published a collection of factsheets covering the different aspects of the Employment Rights Act 2025. They were updated in January 2026. The overview factsheet provides general guidance on the measures included within the Act and seeks to explain to employers and employees how they will affect them.

Other factsheets are available on:

- Bereavement, paternity and unpaid parental leave
- Collective redundancy
- Enhanced dismissal protections for pregnant women and new mothers
- Equality action plans and outsourcing
- Fair Work Agency
- Fire and rehire
- Flexible working
- Heritage railway volunteers
- Mandatory seafarers' charter
- Maritime international conventions
- Non-disclosure agreements
- Preventing workplace sexual harassment: enabling regulations about 'reasonable steps'
- Public sector outsourcing
- School support staff negotiating body
- Social care negotiating bodies and Fair Pay Agreements
- Statutory sick pay
- Strengthening protections for whistleblowers
- Tips and gratuities
- Trade unions
- Umbrella companies
- Unfair dismissal
- Zero hours contracts.



These reforms are intended to better protect the services and other activities that are essential to the day-to-day functioning of society in the UK

Implementing the Plan to Make Work Pay and Employment Rights Act

The government published an updated implementation timeline for its Plan to Make Work Pay and the Employment Rights Act 2025 in February. The timeline aims to give employers, workers, and businesses confidence about upcoming changes.

The timings for implementation will be kept under review as consultations are undertaken and policies are developed. The latest version sets out the following:

Measures that took effect at Royal Assent, December 2025

- The repeal of the Strikes (Minimum Service Levels) Act 2023.

Measures that took effect on 18 February 2026

- The repeal of the great majority of the Trade Union Act 2016, thereby simplifying requirements on trade unions, including in relation to industrial action and political funds.
- Removing the 10-year ballot requirement for trade union political funds.
- Simplifying industrial action notices and industrial action ballot notices.
- Protections against dismissal for taking industrial action.
- Employees that are newly eligible for 'Day 1' Paternity Leave and Unpaid Parental Leave can give notice.

Measures that took effect on 1 April 2026

- The repeal of the levy that trade unions and employer associations pay to the Certification Officer.

Measures that will take effect on 6 April 2026

- Collective redundancy protective award—doubling the maximum period of the protective award.
- 'Day 1' Paternity Leave and Unpaid Parental Leave.
- Whistleblowing—strengthening protections for workers who 'blow the whistle' on sexual harassment.
- Bereaved Partners' Paternity Leave—(non-MWP measure) will enable bereaved fathers and partners to take up to 52 weeks of paternity leave if the mother or primary adopter dies within the first year of the child's life.
- Statutory Sick Pay (SSP)—removing the Lower Earnings Limit (LEL) and waiting period.
- Action plans on gender equality and supporting employees through the menopause (voluntary).
- Menopause guidance.
- Simplifying trade union recognition process.

Measures that will take effect on 7 April 2026

- The establishment of the Fair Work Agency.



Measures that will take effect no earlier than August 2026

- Electronic and workplace balloting for Statutory Trade Union Ballots.

Measures that will take effect in October 2026

- Bringing forward regulations to establish the Fair Pay Agreement Adult Social Care Negotiating Body in England.
- Procurement—two-tier code.
- Tightening tipping law.
- The duty to inform workers of their right to join a trade union.
- Strengthening trade unions' right of access.
- Requiring employers to take 'all reasonable steps' to prevent sexual harassment of their employees.
- Introducing an obligation on employers not to permit the harassment of their employees by third parties.
- Introducing a power to enable regulations to specify steps that are to be regarded as 'reasonable', to determine whether an employer has taken all reasonable steps to prevent sexual harassment.
- Unfair practices in the trade union recognition process.
- New rights and protections for trade union representatives.
- Extending protections against detriments for taking industrial action.

Measures that will take effect no earlier than October 2026

- Employment tribunal time limits.

Measures that will take effect in December 2026

- Commencement of the Mandatory Seafarers' Charter.

Measures that will take effect in January 2027

- Reduction of unfair dismissal qualifying period to 6 months, for dismissals from 1 January 2027, and uncapping compensatory awards.
- Fire and rehire protections.

Measures that will take effect in 2027

- Action plans on gender equality and supporting employees through the menopause (mandatory).
- Enhanced dismissal protections for pregnant women and new mothers.

- Specifying steps that are to be regarded as 'reasonable', to determine whether an employer has taken all reasonable steps to prevent sexual harassment.
- Extending blacklisting protections.
- Industrial relations framework.
- Regulation of umbrella companies.
- Collective redundancy—collective consultation threshold.
- Flexible working.
- Bereavement leave including pregnancy loss.
- Ending the exploitative use of zero-hours contracts.
- Electronic and workplace balloting for recognition and derecognition ballots

Guidance: a complete guide to new legislative requirements under the Procurement Act 2023

The government has published a guide summarising new legislative requirements being introduced under the Procurement Act 2023. The legislative requirements being commenced are:

- Section 69 (Payments compliance notices)
- Section 70 (Information about payments under public contracts)
- Section 71 (Assessment of contract performance)
- Below Threshold Identifiers.

The commencement timings are as follows:

- Section 69 (publication of Payments Compliance Notices) was commenced on 1 January 2026 (other than in respect of procurement regulated by the Welsh Ministers), and will be commenced on 1 April 2026 in respect of procurement regulated by the Welsh Ministers.
- Section 70 (publication of information about payments under public contracts) will be commenced on 1 April 2026 (other than in respect of procurement regulated by the Welsh Ministers).
- Section 71 (publication of information on contract performance) was commenced on 1 January 2026.
- The requirement to include a supplier's unique identifier in notifiable below threshold contracts will take effect from 1 April 2026 (other than in respect of procurement regulated by the Welsh Ministers).

This guidance sets out the legislative requirements for the sections detailed above.

Consultations

Make Work Pay: consultation on improving access to flexible working

This consultation invited views on a new process for employers to follow when handling flexible working requests, as well as insights on flexible working practices more broadly.

The Employment Rights Act introduces the new process and this consultation aims to ensure that it meets the needs of both employers and employees. It sought views on:

- A proposed new light touch process for employers consulting with employees where a request cannot be immediately agreed.
- What training, resources and support can help businesses navigate flexible working requests.
- Other ways to improve access to flexible working.

The consultation closes on 30 April 2026.

This consultation invited views on a new process for employers to follow when handling flexible working requests

Make Work Pay: fire and rehire—changes to expenses, benefits, and shift patterns

The government issued a consultation on two proposed changes to fire and rehire protections in relation to benefits and expenses, and to shift patterns.

Fire and rehire refers to the process of an employer dismissing an employee and then re-employing them (or someone else) under a new contract, usually with less favourable terms and conditions.

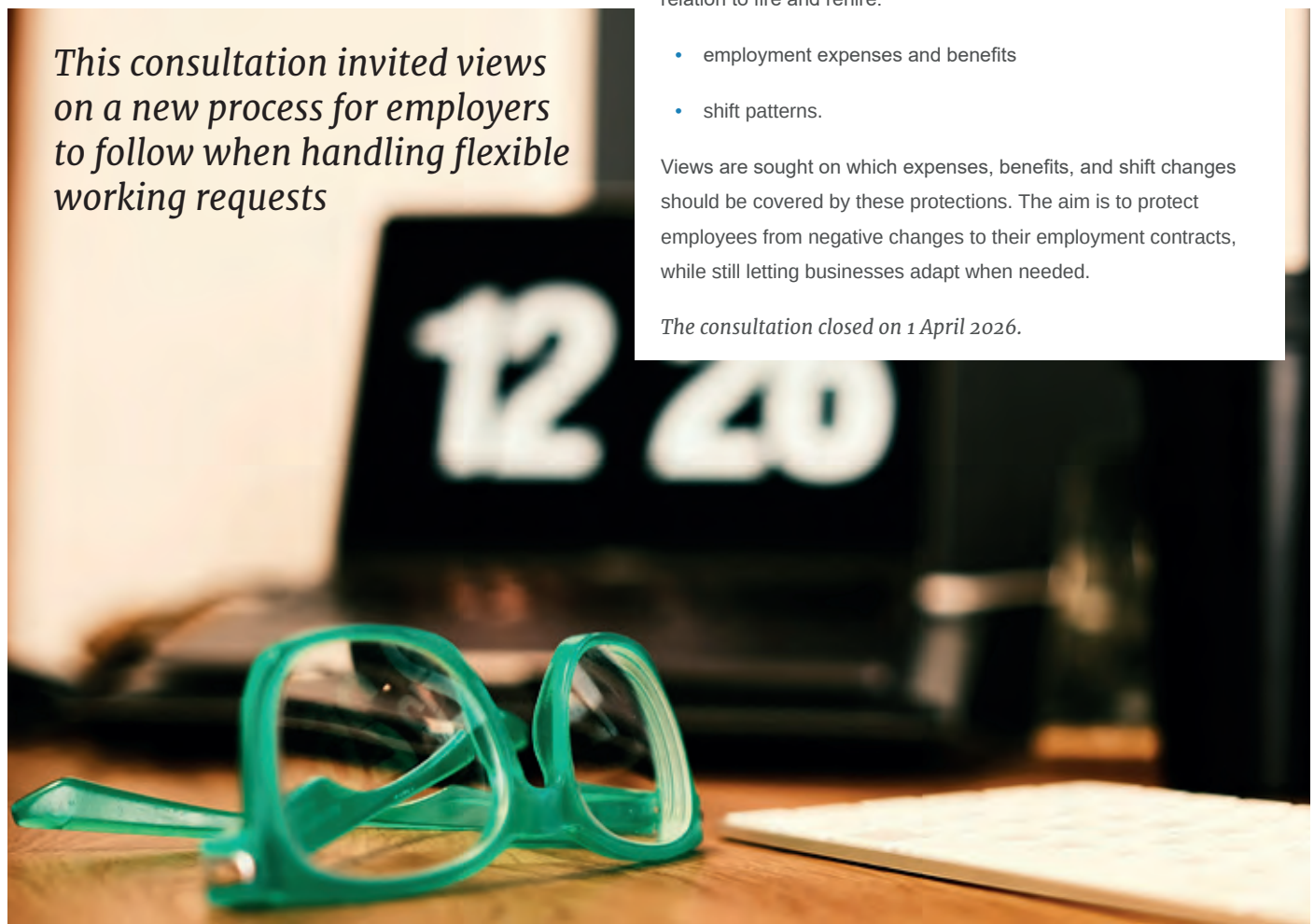
The Employment Rights Act 2025 will introduce new protections to prevent unscrupulous fire and rehire practices. The government wants to ensure the rules are fair for both employees and employers. The Act will, once commenced, make it an automatic unfair dismissal where an employee is dismissed or replaced in order to make changes to core terms in their employment contract (protected as 'restricted variations').

The government is consulting on two types of restricted variations in relation to fire and rehire:

- employment expenses and benefits
- shift patterns.

Views are sought on which expenses, benefits, and shift changes should be covered by these protections. The aim is to protect employees from negative changes to their employment contracts, while still letting businesses adapt when needed.

The consultation closed on 1 April 2026.



Make Work Pay: recognition code of practice and e-balloting unfair practices

This consultation from the Department for Business and Trade invited views on the revised code of practice during recognition and derecognition processes and on proposals on unfair practices in electronic ballots.

The Employment Rights Act (ERA) makes several changes to the statutory trade union recognition process to ensure that workers have a meaningful right to organise through trade unions.

Before the changes can come into effect, the code of practice on access and unfair practices during recognition and derecognition process ('the code') must also be updated to reflect the legislative changes.

The government has redrafted the existing version of the code and sought views on these changes before the code is finalised and brought into effect.

The consultation closed on 1 April 2026.

Make Work Pay: modernising the Agency Work Regulatory Framework

Views are being sought on proposals to improve the framework which governs the temporary labour market to better protect workers while minimising business burdens.

The regulatory framework which governs the temporary labour market includes a number of laws. The Employment Rights Act 2025 will bring umbrella companies—a type of payment intermediary common in the agency work market—within scope of this framework.

The government is now seeking views on:

- How the regulatory framework should be adapted to account for the activities of umbrella companies.
- What broader changes should be considered in order to modernise the rules.

The consultation closes on 1 May 2026.

Code of practice on time off for trade union duties and activities (draft)

Acas launched a consultation on updates to its Code of Practice on time off for trade union duties and activities.

The Employment Rights Act (the Act) introduces new statutory rights to time off for union equality representatives that mirror the existing rights for union learning representatives and require employers to provide 'accommodation and other facilities' to union representatives for their time off duties.

The Code of Practice on time off for trade union duties and activities was last updated in 2010. It aims to provide good practice advice to help explain the new rights provided for by the Act. The purpose of the new draft Code is to set out guidance on good practice that will aid and improve the effectiveness of relationships between employers and trade unions. This guidance will be taken into account by employment tribunals in relevant cases.

The consultation closed on 17 March 2026.



Draft BS ISO 30441 Human resource management—workplace wellbeing—guidelines for thriving workplaces

This draft British Standard provides guidance for organisations to develop principles and processes to improve conditions and practices that support and promote workplace well-being, thereby contributing to Human Resources Management (HRM) outcomes and the strategic goals of the organisation.

The document presents principles and processes that can be adapted to the needs of any organisation regardless of sector (e.g. public, private, government or non-governmental organisations) regardless of size, type of activity or industry.

It is intended for use by organisations committed to placing workers at the core by ensuring values, and practices that uphold human dignity are aligned to the organisation's strategic objectives.

Comments were invited until 9 March 2026.

Draft BS 8703 Facilities management—development of a workplace strategy—guide

This draft British Standard provides guidance for owners, operators, and occupants in their decision making towards an appropriate strategy for the management of their workplaces.

It identifies the questions and challenges to be addressed to enable owners, operators, and occupants to determine their workplace strategy as a key input to a management of change process. Recommendations are made on practices to be adopted and the reasoning behind them is explained.

The standard is intended to be used by organisations as owners, operators, or occupants and those acting on their behalf, for example, facility managers and their teams. It does not cover workplace options or offer design solutions.

The British Standard is intended to strengthen workplace management by:

- Assisting organisational decision making in relation to the management of the workplace.
- Raising awareness of novel concepts and arrangements.
- Providing insights into evolving work practices and opportunities for innovation in the workplace.
- Promoting a healthy, safe, secure, and productive work environment that enhances the wellbeing of occupants, visitors, and other users of the workplace.

Comments on the draft are invited until 11 May 2026.



Environment

Wales: New recycling rules from April 2026 for Welsh workplaces

As part of the phased implementation of the Workplace Recycling regulations (the Waste Separation Requirements (Wales) Regulations 2023), from April 2026, the requirement on workplaces to present specified wastes separately for recycling will extend to small Waste Electrical and Electronic Equipment (sWEEE). Previously only unsold sWEEE was required to be separated.

sWEEE is any waste item with a plug, battery or cable that is less than 50 centimetres on its longest edge. This includes an organisation's unwanted small tech and electricals including for example, laptops, phones, kettles, toasters, medical devices, lamps and lighting and power tools.

This requirement has been put in place to ensure that small waste electricals from workplaces are not disposed of with general (black bag) waste and are instead kept separate from other waste so that they can be recycled.

In summary, the update to the law covering small electrical items means that:

- From 6 April 2026, workplaces must separate any unwanted, small waste electrical items for onward recycling.

Small waste electricals are any item with a plug, battery or cable which measures 50cm or less on every side.

- Where repair and reuse isn't possible, electricals should be kept separate from other waste and recycled and not put in the general waste or other recyclable waste streams.
- If waste electricals are hazardous, these items will need to be managed in accordance with the Hazardous Waste (England and Wales) Regulations 2005.

The Welsh Government has updated its **Code of Practice** which provides detailed information about the workplace recycling law and how to comply. The update includes information about the small electricals requirements.

The **Waste Separation Requirements (Wales) (Amendment) Regulations 2026** came into force on 6 April 2026 and set out the specific requirements for the presentation, collection, and handling of various recyclable waste streams. The amendment made by these Regulations provide for the above requirement—that is, that workplaces present sWEEE separately for collection and onward recycling.

These Regulations also remove the exemption for hospitals in Wales (both NHS and private) to present waste separately for collection, as it expires on the day that these Regulations come into force (6 April 2026)



sWEEE is any waste item with a plug, battery or cable that is less than 50 centimetres on its longest edge

Scotland: Digital Waste Tracking (Scotland) Regulations 2026

These Regulations come into force on 1 January 2027. They establish a single, mandatory digital system for recording information on all types of controlled waste. They apply to operators of permitted waste facilities in Scotland receiving controlled waste. Controlled waste is household, industrial or commercial waste.

The Digital Waste Tracking System is being delivered on a phased basis in all four nations of the UK. This Instrument introduces the first phase in Scotland and will apply to waste received at facilities conducting certain waste activities. Later phases of the digital waste tracking system will apply to all waste movements and transfers and will be introduced in future Regulations.

Under the Regulations, operators of a permitted facility are required to enter information regarding controlled waste into the Digital Waste Tracking System and to pay an annual fee of £26.

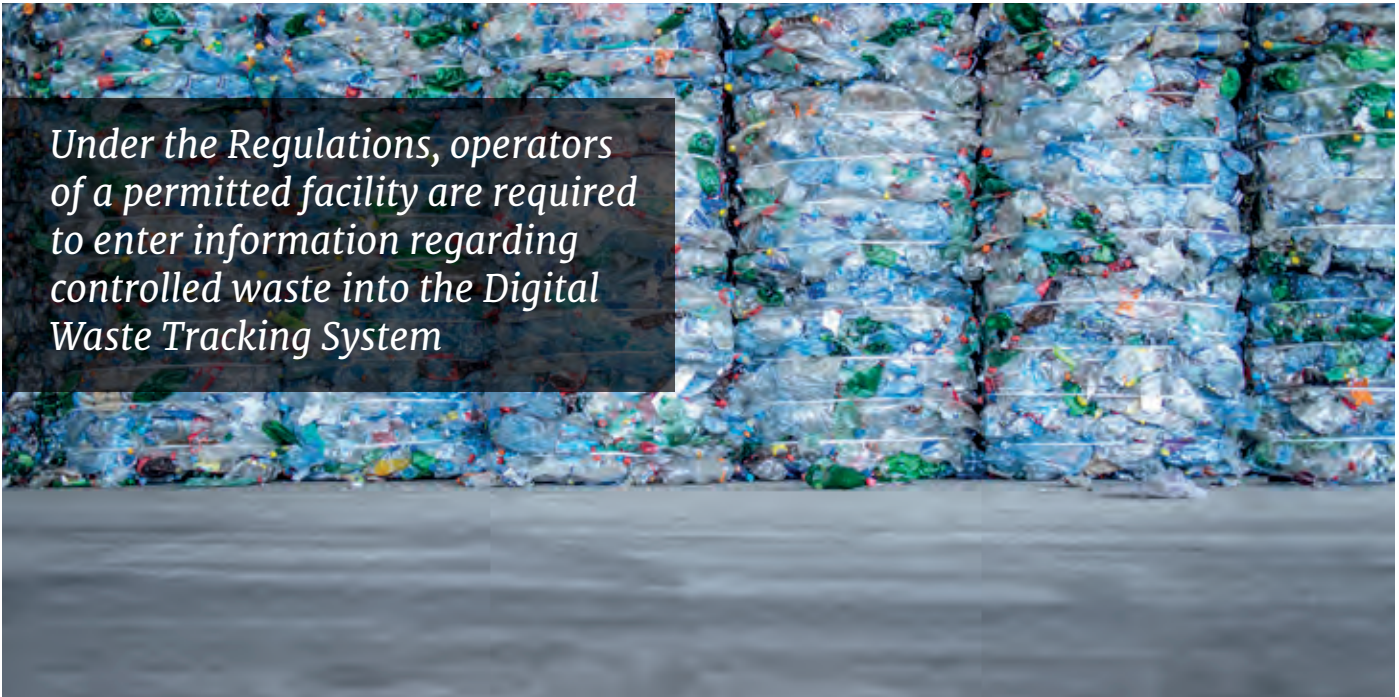
The system replaces paper-based systems, which have been described as inconsistent, with a streamlined digital service. This aims to reduce the chance of waste crime while improving compliance. The new system aims to enable faster, data driven enforcement, and support fairer competition and stronger environmental performance through better tracking and oversight.

The first phase will apply to all waste received at permitted facilities carrying out a waste activity. Local authorities will not need to track household waste collections from individual houses or collection rounds, but this waste will be tracked from the point at which the waste arrives at a receiving site. Waste received at household waste and recycling centres (HWRCs) will also be excluded from the digital system.

The Instrument requires the 'designated person' (Scottish Ministers in respect of Scotland) to establish, maintain and operate the Digital Waste Tracking System for the purpose of tracking controlled waste.

Some individuals may be digitally excluded, for example due to religious beliefs or lack of digital connectivity. As such, digitally excluded persons will be exempted from the use of the Digital Waste Tracking System. They will instead be required to create written records and submit information via a non-digital route to SEPA on quarterly basis.

SEPA will be the enforcing body for the system. Offences which are created under the Regulations will be added to the "relevant offences" in the Environmental Regulation (Enforcement Measures) (Scotland) Order 2015 in advance of these Regulations coming into force in January 2027. There are also provisions relating to offences by bodies corporate and offences by Scottish partnerships, or unincorporated associations.



Under the Regulations, operators of a permitted facility are required to enter information regarding controlled waste into the Digital Waste Tracking System

Scotland: Environmental Protection (Wet Wipes Containing Plastic) (Scotland) Regulations 2026

These Regulations come into force on 11 August 2027 and will ban the supply and sale of wet wipes containing plastic by persons acting in the course of a business in Scotland, with exceptions.

There will be exemptions for the supply of wet wipes containing plastic by retail pharmacy businesses, supply for medical purposes, supply to businesses and local authorities. Members of the public who have a genuine need for wet wipes containing plastic for medical care purposes will be able to obtain these on request from retail pharmacies.

A transition period is to apply to allow businesses time to adapt.

The measure forms part of a coordinated four-nation approach across the UK and is designed to cut marine litter, reduce sewer blockages and limit the release of microplastics into the environment. The coordinated legislation across the other nations is as follows:

- **Environmental Protection (Single-use plastic products) (Wet Wipes) (Wales) Regulations 2025**

These regulations will ban the supply, or offer to supply, of wet wipes which contain plastic from 18 December 2026.

- **Environmental Protection (Wet Wipes Containing Plastic) Regulations (Northern Ireland) 2025**

Similarly, these Regulations prohibit the sale and supply of most plastic-based, single-use wet wipes to end-users to reduce pollution. The ban takes effect on 18 May 2027.

- **Environmental Protection (Wet Wipes Containing Plastic) (England) Regulations 2025**

These Regulations ban the supply and sale of wet wipes containing plastic (with certain exemptions), to reduce unnecessary plastic and microplastic pollution, and will come into force on 19 May 2027.

Producer Responsibility Obligations (Packaging and Packaging Waste) (Amendment) Regulations 2025

These Regulations apply to businesses which supply packaging or packaged goods in the United Kingdom. They came into force on 1 January 2026.

The Regulations make amendments to the Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024 (the pEPR Regulations).

The pEPR Regulations provide for the imposing of requirements on businesses which supply packaging or packaged goods (referred to as “producers”) in the UK. They require producers to register with the appropriate agency, to collect and report data in relation to packaging they supply, and to assess the recyclability of that packaging.

The amendments in these Regulations are required to enable the appointment of a producer responsibility organisation (PRO), supporting closer producer involvement in the pEPR scheme. The amendments also:

- Enable producers to deduct tonnage of recycled food grade plastics packaging waste from their pEPR obligations, where they have collected it directly from consumers and sent it for reprocessing in a closed loop recycling system where it is turned back into food grade recyclate.
- Improve the operational efficiency of the scheme and provide greater clarity to producers on where obligations sit. This includes resolving potential loopholes and removing ambiguity, improving the approach to local authority costs modelling, and removing barriers to compliance and enforcement, including updating regulator charges.



Waste Electrical and Electronic Equipment (Amendment, etc.) Regulations 2025

These Regulations apply to manufacturers, importers and distributors (including retailers) of electrical and electronic equipment (EEE). They came into force on 12 August 2025.

The Regulations amend the Waste Electrical and Electronic Equipment Regulations 2013 which require the producers of electrical and electronic equipment who place electronic equipment on the market to meet recovery and recycling targets. Producers of electronic equipment must help finance the collection, treatment, recovery, reuse, recycling, and environmentally sound disposal of waste electronic equipment.

The Regulations aim to address two widely recognised deficiencies of the current UK wide regime by:

- Placing new obligations on online marketplaces so that they contribute to the cost of collection, treatment, re-use, and recycling of waste electricals in line with those obligations that currently apply to companies defined as producers within the existing regulations. The new requirements will apply to online marketplaces only in respect of equipment placed on the UK market by their overseas based sellers.
- Creating a new category of equipment for vapes to ensure that the costs of collecting and treating these items are borne solely on those who place them on the market.

Wales: Environmental Protection (Single-use Vapes) (Wales) (Amendment) Regulations 2025

These Regulations apply to those involved in the supply of single-use vapes in Wales, and to local authority enforcement officers responsible for enforcing the law in relation to these products. They came into force on 19 June 2025.

The Regulations amend the Environmental Protection (Single-use Vapes) (Wales) Regulations 2024 (the 2024 Regulations). The 2024 Regulations prohibit the supply of single-use vapes (those which are not designed or intended to be re-used as they are not refillable, rechargeable, or both) in Wales.

These Regulations provide for changes relating to the powers of entry and examination, including the search for and seizure of single-use vapes, and components thereof.

Scotland: Environmental Authorisations (Scotland) Amendment Regulations 2026

These Regulations apply to the operators of fish farms found between 3–12 nautical miles off the coast of Scotland. They came into force on 26 March 2026.

Producers of electronic equipment must help finance the collection, treatment, recovery, reuse, recycling, and environmentally sound disposal of waste electronic equipment

The primary purpose of these Regulations is to identify SEPA as the responsible authority for the regulation of fish farm discharges between 3–12 nautical miles, to ensure the activity is appropriately regulated in the most efficient manner possible.

They amend the Environmental Authorisations (Scotland) Regulations 2018 and the Environmental Authorisations (Scotland) Amendment Regulations 2025.

Biodiversity Beyond National Jurisdiction Act 2026

This Act, which received Royal Assent on 12 February 2026, applies to individuals and authorities concerned with marine biodiversity, particularly those involved in undertaking or managing projects that collect marine genetic resources (as defined below) in areas beyond national jurisdiction.

It makes provisions for the implementation by the UK of the Biodiversity Beyond National Jurisdiction (BBNJ) Agreement. The BBNJ Agreement (also known as the High Seas Treaty) is an international agreement that creates a legal mechanism to establish protected zones in waters beyond any nation's jurisdiction.

The BBNJ Agreement will:

- Enable the creation of marine protected areas on the high seas.
- Require environmental impact assessments for activities that could have significant impact on marine ecosystems in areas beyond national jurisdiction.
- Ensure fair sharing of benefits from research into and utilisation of marine genetic resources, which have potential applications in medicines, cosmetics and biotechnology.
- Strengthen capacity-building for developing states, by promoting knowledge sharing, along with broader technology transfer.

Secondary legislation will need to be put in place to ratify the BBNJ Agreement. This includes amending the current marine licensing regime to ensure compliance with BBNJ Environmental Impact Assessment obligations. Details for amending existing legislation are set out in the Act.

Wales: Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill

In February 2026, the Senedd approved the Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill.

The Bill establishes a new framework for environmental protection, creating an independent watchdog and empowering Welsh Ministers to set legally binding biodiversity targets.

The Office of Environmental Governance Wales will be an independent body responsible for holding public authorities to account on environmental law. This includes scrutinising the Welsh Government, Natural Resources Wales and local authorities.

The legislation also enables and requires Ministers to set ambitious, legally binding targets to halt and reverse biodiversity decline by increasing native species, strengthening ecosystem resilience and addressing the drivers of biodiversity loss.

The Bill is set out in four parts:

- Part 1: focusses on Environmental Objectives and Principles
- Part 2: establishes the Office of Environmental Governance Wales (OEGW)
- Part 3: introduces legally binding Biodiversity Targets
- Part 4: sets out general provisions.

Greenhouse Gas Emissions Trading Scheme Auctioning (Amendment) Regulations 2026

These Regulations apply to businesses in the UK which are a part of the UK Emissions Trading Scheme. It will come into force on 8 April 2026.

They make amendments to the Greenhouse Gas Emissions Trading Scheme Auctioning Regulations 2021 (the 2021 Regulations). The 2021 Regulations provide for the auctioning of emissions allowances to emit one tonne of carbon dioxide equivalent under the UK Emissions Trading Scheme (the UK ETS).

The amendments update the auction reserve price (ARP), which is the minimum price at which emissions allowances can be sold at auction, to reflect inflation since the introduction of the UK ETS. They also provide for the introduction of a mechanism for annual inflation-based adjustments from 1 January 2027 onwards.



Greenhouse Gas Emissions Trading Scheme (Amendment) Order 2026

This Order came into force on 11 March 2025. It makes amendments to the legislation which gives effect to the UK Emissions Trading Scheme (the “UK ETS”).

This includes provisions enabling incumbent installations to have their 2020, or 2020 and 2021, scheme year(s) data excluded from the calculation of their historical activity level (HAL) for the 2027–2030 allocation period. The primary aim of these provisions is to mitigate the impact of the COVID-19 pandemic on HALs for the 2027–2030 allocation period.

The Order also includes provisions to retain current UK ETS free allocation benchmarks used in the free allocation calculation for the 2027 scheme year and adopt updated benchmarks in the free allocation calculation for the years 2028, 2029 and 2030 of the 2027–2030 allocation period to continue to reward efficient installations and incentivise decarbonisation.

It enables the reduction of free allocation annually during the period 2027–2030 for sub-installations operating in one of the five sectors covered by the UK Carbon Border Adjustment Mechanism (the UK CBAM). To do this, operators will be required to inform the regulator which of their sub-installations serve the production of UK CBAM goods and a UK CBAM reduction factor will be applied to those sub-installations in each of the 2027–2030 scheme years.

The Order also makes a clarification to the annual reporting requirement that applies to installations that receive free allocation and permanently cease their activities.

Revision of ISO 14001:2026

The new version of ISO 14001, expected to be published in April 2026, is progressing through the revision process.

The upcoming BS EN ISO 14001:2026 edition will supersede BS EN ISO 14001:2015 and introduces improvements to make the standard easier to understand and integrate.

The Final Draft International Standard (FDIS) includes some editorial changes, updating references, restructuring, renumbering minor changes and points of clarification. This includes the use of 'results' as the term used for the output of a process, such as management review, or intended outcome of an objective. 'Outcome' remains the relevant term when considering the whole EMS. There is also a shift in terminology to include changing the term fulfilment to meeting in reference to the compliance obligations.

Expected changes include:

Clause 4: Context. What's new in ISO 14001 the context of the organisation?

- Requirement life cycle perspective (LCP) when setting the EMS scope. This will be in addition to considering LCP for environmental aspects and operational controls, to ensure that upstream and downstream impacts the organisation can control, or influence, are not overlooked.

Clause 5: Leadership. What's different for leadership and commitment in ISO 14001?

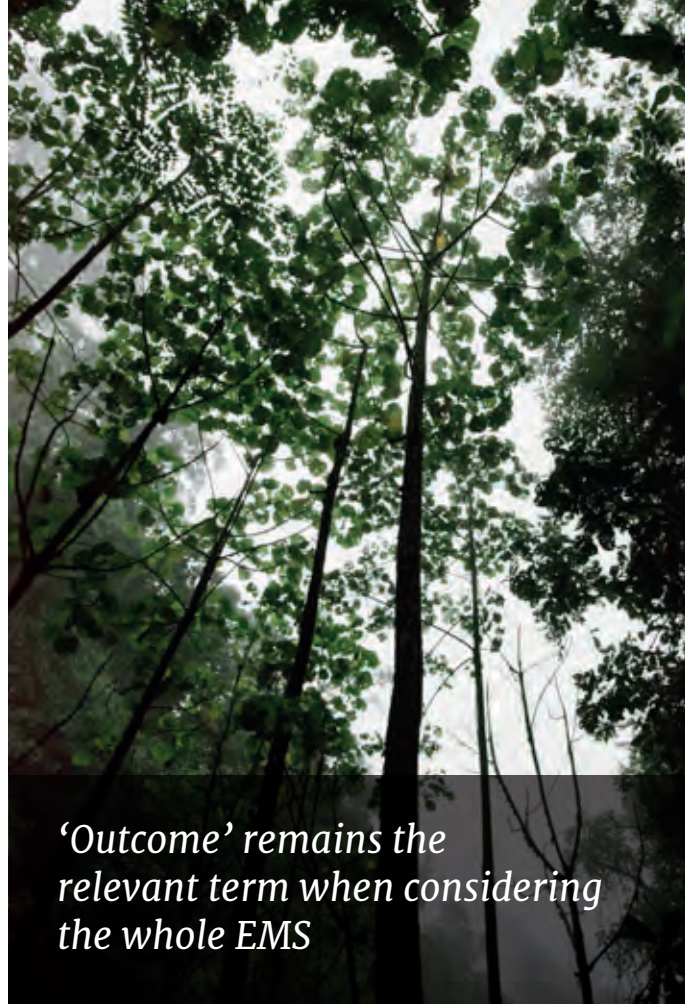
- Requiring top management to now support all relevant roles and not just management roles, extending the level of personal involvement, responsibility and accountability.

Clause 6: Planning. How is planning evolving in ISO 14001?

- Introduces a new requirement 'Planning and managing of changes', that requires organisations to determine the need, and to plan and manage changes that affect or can affect the intended outcomes of the EMS.
- When determining what environmental aspects need to be considered, the requirement has changed from identifying reasonably foreseeable emergency situations to identifying all potential emergency situations.

Clause 7: Support. What's changing in the support function in ISO 14001?

- Introduces minor adjustments, primarily focused on terminology updates.



'Outcome' remains the relevant term when considering the whole EMS

Clause 8: Operation. What's new in ISO 14001 for operational control?

- The organisation's controlling or influencing of outsourced processes are now limited to those relevant to the intended outcomes of the EMS, now termed as 'external provided processes, products or services'.
- Emergency situations (ES) will be identified when considering 'risks and opportunities' and not just environmental aspects, so that all eventualities, or potential ES, are identified.

Clause 9: Performance evaluation. How is performance evaluation changing in ISO 14001?

- Effectiveness of the environmental management system is fundamental to this clause and is now included in the first sentence. There is a new requirement expected that each internal audit shall have defined objective(s).

Clause 10: Improvement. What's different in ISO 14001 for continual improvement?

- Introduces minor adjustments, primarily focused on terminology updates with minimal operational impact.

These changes aim to embed environmental considerations into business strategy and processes and make BS EN ISO 14001:2026 more accessible and relevant for organisations of all sizes.

Updated Environmental Improvement Plan 2025

The government published its updated Environmental Improvement Plan (EIP) on 1 December 2025.

This is the first update of the previous government's EIP published in 2023 which aimed to revise the broad aims laid out in the Environment Act, passed in 2021. The EIP contains several measures that will contribute to the protection of the environment, as well as protecting valuable resources like clean water.

It sets targets which the government will use to:

- Ensure England is on track to deliver the targets and objectives set out in the Environment Act 2021.
- Drive progress towards 10 goals which will ultimately contribute towards its 'apex goal' of restored nature.

There are five inter-related chapters setting out the 10 long-term goals for the natural environment, covering restored nature, air, water, chemicals and pesticides, waste, resources, climate change, environmental hazards, biosecurity and access to nature.

Each chapter sets out how the goals are inter-related, the commitments being made for the environment, and the actions being taken to deliver them.

The goals set out:

- Targets and commitments to achieve long-term goals, monitored and reported on in annual progress reports.
- Each commitment has a key metric and a contribution to the outcomes of the chapter, set out in the EIP Monitoring Plan.
- Key system connections between commitments are signposted in systems connections boxes.

The EIP includes stronger air pollution targets, and a commitment to publish a PFAS ('forever chemicals') action plan in 2026; this was issued by Defra in February and sets out regulatory and non-regulatory interventions, measures and initiatives with specific actions and delivery milestones (see below). It adds that in 2027, regulators will make a decision on implementing a potential UK REACH restriction on PFAS in firefighting foams, based on a prior proposal to be provided by the HSE and with the consent of the devolved governments of Scotland and Wales.

PFAS Action Plan

A report from Defra published in February sets out a cross-government, science-led plan to understand impacts of per- and polyfluoroalkyl

Producers of electronic equipment must help finance the collection, treatment, recovery, reuse, recycling, and environmentally sound disposal of waste electronic equipment

substances (PFAS, also known as 'forever chemicals') on public health and the environment, with coordinated actions to minimise risks.

The Plan sets out the government's overall approach to this issue, with actions across three main sections:

- understanding PFAS sources
- tackling PFAS pathways
- reducing ongoing exposure to PFAS.

There is currently no evidence of PFAS above permitted levels in drinking water supplies in England and Wales. Amongst the measures in the Plan, and to protect public health, a consultation is due to be launched later this year on introducing a statutory limit for PFAS in England's public supply regulations. Should permitted levels ever be exceeded, this will make it easier for the regulators to enforce against water companies breaking the rules. In terms of PFAS in the environment, evidence suggests their production methods can emit high levels of PFAS. The government and businesses will explore how production methods could be modified to deliver new products which are PFAS free.

Other measures and interventions included in the Plan cover:

- Developing new guidance for regulators and industries to address legacy PFAS pollution on contaminated land to ensure a consistent and practical approach.
- Carrying out tests on food packaging, like microwave popcorn bags and pizza boxes, to trace the presence of PFAS and support future regulatory action.
- Publishing a new website to raise the public's awareness and understanding of PFAS while also improving transparency of action being taken across government.

ESG

Guidance: Making green claims—getting it right, across the supply chain

The Competition and Markets Authority (CMA) has published its latest consumer protection law guidance on environmental claims, taking a broader holistic approach across the entire supply chain process.

Published in February, the guidance builds on the CMA's existing Green Claims Code and its guidance on environmental claims by the fashion sector to explain how accountability will be held for ensuring claims are not misleading when multiple businesses contribute to a product's journey.

Under the new guidance, verification and substantiation are emphasised with a need for green claims to be backed by evidence, even if the supporting information sits with another firm in the supply chain.

Under the new guidance, the CMA takes the view that action may be brought against more than one party in a supply chain if consumers have been misled about the green credentials of a product or service—with not only what a business says, but how the message is communicated and what is left unsaid also areas of consideration.

Also under scrutiny will be packaging, logos and imagery suggesting an environmental benefit, along with omitted information which would impact on consumer understanding, such as taking into account the disposal conditions for a product, which may be key to whether the stated environmental benefit can be realised.

Retailers will also risk liability if they stock a product with false or misleading green claims alongside the manufacturer, with the authority warning some businesses may need to reconsider a trading relationship for a product if there is insufficient information in the supply chain, given the legal risk they could face for non-compliance.

While genuine attempts by businesses to comply may mitigate penalties, the CMA warned it would look at who engaged in false claims and who made or repeated them, and which business is best placed to rectify harm and prevent recurrence.

EU regulation on deforestation-free products—application postponed

The European Parliament and the Council of the EU adopted a revision of the EU regulation on deforestation-free products (EUDR), to simplify its implementation and ensure that operators, traders and authorities are ready for its application.

The revision streamlines the due diligence requirements and postpones the application of the regulation for all operators until 30 December 2026, with an extra six-months for micro and small operators. This comes in response to concerns raised about administrative burden and the readiness of the IT system necessary for the effective functioning of the EUDR, while fully preserving the regulation's objectives of preventing deforestation and forest degradation linked to products placed on the EU market.

To further reduce administrative burden, certain printed products (such as books, newspapers, printed pictures) were removed from the scope of the regulation, reflecting the limited deforestation risk associated with these items.

The revision introduces the obligation for the European Commission to conduct a simplification review of the regulation and present a report by 30 April 2026. The report will seek to evaluate the impact and administrative burden of the EUDR, particularly for smaller operators, and should, where appropriate, be accompanied by a legislative proposal.

Packaging, logos and imagery suggesting an environmental benefit will be under scrutiny



Simplified sustainability reporting and due diligence rules for businesses

This legislation simplifies the directives on corporate sustainability reporting (CSRD) and corporate sustainability due diligence (CS3D) by reducing the reporting burden and limiting the 'trickle-down effect' of obligations on smaller companies.

CSRD

The corporate sustainability reporting directive (CSRD) scope has been narrowed by raising its thresholds to companies with more than 1,000 employees and above €450 million net annual turnover. In terms of third-country undertakings, the updated requirements will apply only to companies with a net turnover above €450 million for the parent undertaking within the EU and above €200 million generated turnover for the subsidiary or branch.

The amending directive also provides for a transition exemption for companies that had to start reporting from financial year 2024 falling out of scope for 2025 and 2026. It also includes an exemption for certain EU and non-EU financial holding companies from consolidated reporting.

CS3D

The corporate sustainability due diligence directive (CS3D) has been narrowed by raising its thresholds to companies with more than 5,000 employees and above €1.5 billion net turnover, considering that such large companies have the biggest influence on their value chain and are best equipped to make a positive impact and absorb the costs and burdens of due diligence processes.

The obligation for companies to adopt a transition plan for climate change mitigation under the CS3D has been removed.

The amending directive postpones the CS3D's transposition deadline by member states into national law by another year, to 26 July 2028. Companies will have to comply with the new measures by July 2029.

EU CBAM—January requirements

The EU CBAM, formally known as EU Regulation 2023/956, is a climate policy tool that applies a carbon price on certain goods imported into the EU. It ensures that imported goods whose production is at the greatest risk of carbon leakage face similar carbon emissions-related costs as those produced in the EU.

The following goods are currently in scope of the EU CBAM:

- iron and steel

This legislation simplifies the directives on corporate sustainability reporting and due diligence by reducing the reporting burden and limiting the 'trickle-down effect' of obligations on smaller companies

- aluminium
- cement
- fertilisers
- hydrogen
- traded electricity.

The implementation of the EU CBAM has been divided into 2 phases:

- Transitional phase (1 October 2023 to 31 December 2025): EU importers must report greenhouse gas emissions ('emissions') embedded in their imported goods (direct and indirect emissions), without the need to pay any financial adjustment.
- Definitive regime (from 1 January 2026): EU importers must continue reporting and purchase CBAM certificates to cover the emissions embedded in their imported goods.

To comply with EU CBAM from January 2026, EU importers must:

- Maintain records and tracking of embedded emissions from the point of import.
- Purchase and surrender CBAM certificates to cover embedded emissions and submit annual declarations (the first being due by May 2027 for goods imported in 2026).
- EU companies importing less than 50 tonnes of CBAM goods per year are exempt from CBAM obligations. Hydrogen and traded electricity are outside this exemption.

UK CBAM—consultation

The government confirmed in October 2024 that a UK CBAM will be introduced on 1 January 2027 and introduced primary legislation for CBAM in Finance Bill 2025 to 2026. CBAM will place a carbon price on specified goods imported to the UK from sectors that are at risk of carbon leakage. It takes effect from 1 January 2027.

In February 2026, the government published draft primary legislation for technical consultation.

The consultation set out the draft secondary legislation that will come into effect on 1 January 2027 alongside Carbon Border Adjustment Mechanism (CBAM) being introduced.

The aim is to gather feedback from stakeholders on the drafting of the draft secondary legislation to ensure that it delivers the policy correctly and effectively for the tax to operate as intended and provide for administrative matters.

The draft secondary legislation includes the legislative requirements associated with the administration of the tax, including but not limited to:

- administrative requirements relating to registration for CBAM
- tax returns and required content
- reimbursement arrangements
- weight of CBAM goods
- record keeping.

The consultation closed on 24 March 2026.

UK Sustainability Reporting Standards

The Department for Business and Trade updated this guidance in March, which provides information on the UK government's framework to create UK Sustainability Reporting Standards (UK SRS) by assessing and endorsing the global corporate reporting baseline of IFRS Sustainability Disclosure Standards.

The creation of the International Sustainability Standards Board (ISSB) was announced at COP26. The ISSB is a standard-setting board of the International Financial Reporting Standards (IFRS) Foundation, a not-for-profit organisation that sets global corporate reporting standards through the International Accounting Standards Board (IASB).

The UK government has been a strong supporter of the ISSB since its launch and sees its work as consistent with the UK government's aim to make the UK a global centre for sustainable finance.

The UK Government consulted on the exposure drafts of the UK versions of IFRS S1 and IFRS S2, respectively called UK SRS S1 and UK SRS S2.

The consultation ran from 25 June 2025 to 17 September 2025, alongside a consultation on the development of an oversight regime for assurance of sustainability-related financial disclosures. Following this consultation process, the government has now published the finalised versions of UK SRS S1 and UK SRS S2:

- UK SRS S1: general requirements for disclosure of sustainability-related financial information
- UK SRS S2: climate-related disclosures.

Subsequently, the government and the Financial Conduct Authority (FCA) will consider whether to introduce requirements for certain UK entities to report against these standards. The FCA is currently consulting on amendments to the UK Listing Rules. The consultation is open until 20 March 2026.

FCA consults on ESG ratings

The Financial Conduct Authority (FCA) published proposals in December to ensure that environmental, social and governance (ESG) ratings are transparent, reliable and comparable.

ESG ratings inform investment decisions, risk management and regulatory reporting. Global spending on ESG data, including ratings, is projected to reach \$2.2bn in 2025, according to the FCA.

These proposals follow the decision by the government to bring ESG ratings within the FCA's remit, supported by 95% of those who responded to its consultation. Introducing clear, proportionate rules for transparency and governance will help to build the market's trust in ESG ratings and address concerns.

The FCA's research shows around half of those who use ESG ratings are worried about how they are built (55%) and how transparent they are (48%). The proposals aim to address this and focus on four areas:

- Increased transparency—allowing easier comparisons for the benefit of both those who use ratings and those who are rated.
- Improved governance, systems and controls—to ensure clear decision-making and strong oversight and quality assurance.
- Identification and management of conflicts of interest.
- Setting clear expectations for stakeholder engagement and complaints handling.

The consultation closed on 31 March 2026.

Prosecutions

A round-up of some key prosecutions that have happened during the last six months:

Health and Safety / Estates and Facilities Management

Fine for care home company after failures resulted in resident's death

A care home company has been fined over £1.8 million after a resident choked on a piece of food while consuming her evening meal alone in her room.

Elizabeth Campbell (known as Peggy) was a 96-year-old resident of Cradlehall Care Home in Inverness. She was on a specialist diet of soft, moist, and bite-sized food and her care plan stated that she should be closely supervised when eating and drinking.

During an evening meal, the resident was left alone for up to 20 minutes. The HSE's investigation concluded that Peggy's death was caused by the fact the company had failed to ensure that all those working in the home had access to and were familiar with the care plans of its residents and that crucially Peggy had been left unsupervised while eating.

HC-One Limited, who run the care home, pleaded guilty to failings under the Health and Safety at Work etc. Act 1974. The company was fined £1.8 million.

Social housing management firm fined for failing to protect workers

An East Midlands social housing provider has been fined £32,000 after multiple workers were diagnosed with vibration related ill-health conditions such as Hand-Arm Vibration Syndrome (HAVS).

The HSE launched an investigation after it received more than ten reports of vibration related ill-health in a short period of time.

The investigation found that many of the company's employees were exposed to vibration in their day to day work. These included bricklayers, joiners, electricians, plasterers, caretakers and others—while their work was varied, all included extensive use of power tools, ranging from drills and impact drivers to vibrating plates and road breakers, over an extended period of time. Despite this, and the dangers exposure can cause, the company had not properly assessed or controlled worker's exposure to vibration. A suitable and sufficient assessment of the risks posed by vibration was not undertaken.

Nottingham City Homes Limited, of Loxley House, Station Street, Nottingham, pleaded guilty to breaching Section 2(1) of the Health and Safety at Work etc. Act 1974. The company was fined £32,000 and ordered to pay £6,226 in costs.

Ireland: €225,000 fine following fatal accident

Kildare Chilling Company Unlimited Company was fined €225,000 after a worker suffered fatal head injuries as a result of the lid of a vacuum packing machine closing up on him as he was working at it.

The incident happened on 14 May 2020 at Kildare Chilling Company Unlimited, Curragh Road, Kildare Town, Co. Kildare. Mr. Binak Cokaj was working as a packer at the machine.

Kildare Chilling Company Unlimited had previously pleaded guilty to three charges in breach of Safety, Health and Welfare legislation.

Fall from vehicle results in fine for manufacturing firm

A manufacturing company has been fined £80,000 after a visiting lorry driver sustained life-changing injuries when he fell from a trailer during loading operations at a site in County Durham. Graham Davis, 65, a Class 1 driver employed by Dobbs Logistics Ltd, was delivering and collecting goods for Penn Elcom Limited on 18 November 2024 when the incident occurred.

The HSE's investigation found that Penn Elcom Limited failed to ensure the health, safety and welfare of employees and visiting workers by not having suitable and sufficient measures in place to prevent falls from height during loading and unloading operations.

Penn Elcom Limited, of 1st Floor Sackville House, 143–149 Fenchurch Street, London, EC3M 6BN, pleaded guilty to breaching sections 2(1) and

£48k fine due to office block fire safety breaches

The owner of an empty office block was ordered to pay a £48,000 fine after nine people were found sleeping inside the building during a fire safety check.

Tarlochan Singh, 48, was the Director of 5th Capital Limited, the owner of Ridgemount House on Bede Way, Peterlee in County Durham, when concerns were raised with County Durham and Darlington Fire and Rescue Service (CDDFRS) that people were sleeping inside the “derelict” building.

CDDFRS fire safety officers made a late-night visit to the premises and discovered nine people sleeping on the third floor. They also found several other serious fire safety breaches which placed one or more people at risk of death or serious injury in the case of a fire.

These breaches included several failures, including failure to undertake a fire risk assessment and ensuring the premises had appropriate fire detectors and alarms. Singh pleaded guilty to a total of eight charges, all relating to breaches of the Fire Safety Regulatory Reform Order 2005. He was fined £48,000 to be paid within 12 months or face being jailed, with costs of £45,711.48.

Fine after worker crushed by collapsing wall

A construction company has been fined £100,000 after a steel-fixer was seriously injured when a newly built blockwork wall collapsed at a site in Poole.

Matrod Frampton Limited pleaded guilty after the incident left 69-year-old Patrick Grant with life-changing injuries.

The breeze block wall had been back-filled too early, before the mortar had properly set. The wall collapsed while Mr Grant was working nearby, crushing him against the concrete floor of the excavation.

The HSE's investigation found that Matrod Frampton Limited had failed to properly assess a foreseeable risk associated with temporary works on site. Matrod Frampton Limited, of Riverside Park, Wimborne, Dorset, pleaded guilty to breaching Regulations 13(1) and 19(1) of the Construction (Design and Management) Regulations 2015. The company was fined £100,000 and ordered to pay £8,242 in costs and a £2,000 victim surcharge.

Fine for film studio following disturbance of asbestos during maintenance works

A Hertfordshire film studio was fined £6,000 after poor management of minor building works led to the disturbance of asbestos.

Maintenance staff at Elstree Film Studios in Borehamwood were asked to remove acoustic wall paneling from one of the studio buildings. Employees were told that no asbestos was present and began dismantling the panels using claw hammers and crowbars on 22 July 2022. However, one employee identified a layer of insulation that he believed to be asbestos and immediately stopped. Subsequent testing confirmed the presence of Amosite/Chrysotile and Crocidolite, which requires licensed removal.

The HSE found that the studio's asbestos management surveys nor the specific refurbishment surveys had considered certain surfaces, along with failings in training and inadequate emergency arrangements to deal with asbestos disturbance.

Elstree Film Studios Limited pleaded guilty to breaching Regulations 5, 10 and 15 of the Control of Asbestos Regulations 2012 and was fined £6,000 with £6,790 in costs and a £2,000 victim surcharge.

Two companies fined total of £190k for unauthorised Grade I listed building works

Bath & North East Somerset Council successfully prosecuted two companies for carrying out unauthorised works to a Grade I listed building in Bath which affected its character as a building of special architectural or historic interest.

Knight Frank LLP and Emery Brothers Ltd were fined £120,000 and £70,000 respectively, plus costs, after being found guilty of offences under Sections 7 and 9 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The charges related to unauthorised alterations carried out between 1 June 2022 and 4 February 2023 to Number 4 Wood Street, Bath, part of a Grade I listed terrace constructed between 1729 and 1734 by renowned architect John Wood the Elder and now comprising of offices and shops.

Environment

Caravan park owner disturbed SSSI

A Somerset caravan park owner was ordered to pay £116,263 after being convicted of disturbing a Site of Special Scientific Interest (SSSI), which serves as an internationally important breeding ground for wading birds and waterfowl.

John Holland, 59, of Tapmoor Road, Moorlinch, pled guilty to two offences under the Wildlife and Countryside Act 1981 at earlier hearings.

The prosecution was brought by Natural England following a four-year investigation into Holland's activities, which evidenced he had turned the 1.2-hectare grassland site at Long Load within the Wet Moor SSSI into a permanent commercial caravan park. He crammed over 90 caravans and 40 vehicles into two fields and laid 300 metres of tarmac roads, as well as dumping household and commercial waste on the site.

Natural England concluded the works carried out by Holland had resulted in habitat loss, displacement and long-term disturbance to bird species, and charged Holland with two offences in March 2023.

Derbyshire firm pays nearly £90,000 for breaking waste permit

The Environment Agency prosecuted a recycling company for breaking an environmental permit requiring it to keep all waste within its site boundary.

Johnsons Aggregates and Recycling Ltd of Crompton Road, Ilkeston, Derbyshire, were fined £40,000 and ordered to pay costs of £49,886.75.

The company had pleaded guilty to breaching the Environmental Permitting (England and Wales) Regulations 2016.

Wales: Recycling company fined for waste fire safety permit breaches

Atlantic Recycling Ltd was sentenced and fined £40,000 for contravening a condition of its environmental permit for its waste site in Cardiff.

The penalty was imposed following a guilty plea by the company to an offence of failing to comply with a condition of its permit under the Environmental Permitting (England and Wales) Regulations 2016 concerning fire safety requirements.

The offence increased the risk of fire at the site, which stores highly combustible Refuse Derived Fuel (RDF). The site had previously experienced serious fires in 2014 and 2015.

Wales: Sentence for operating waste wood site without a permit

A North Wales company was sentenced for operating a waste wood site without the required permit, following an investigation by Natural Resources Wales (NRW).

Platts Agricultural Limited was sentenced after pleading guilty to operating a waste wood site without the required environmental permit. The offences took place between 2017 and 2021. The court imposed a £22,500 fine and ordered the company to pay £21,910.25 in costs.

NRW brought this prosecution against Platts Agricultural Limited after repeated attempts to secure compliance. Officers inspected the site, set out what permits were needed and by when, and used proportionate enforcement tools. Despite this, Platts Agricultural Limited continued to accept and process waste wood for use in animal bedding without authorisation.

Northern Ireland: Company convicted over water offences

Greenan Generation Ltd was found guilty of offences under Article 7 of the Water (Northern Ireland) Order 1999 as amended. The company pleaded guilty and was fined a total of £6,000 plus £15 Offenders Levy.

On 7 November 2024, Water Quality Inspectors from the Northern Ireland Environment Agency (NIEA) responded to a report of a slurry spill. The NIEA inspectors observed slurry-like material flowing along the roadway and then entering a roadside gully, adjacent to nearby premises. The discharge was traced to an access lane serving an Anaerobic Digester (AD) facility operated by Greenan Generation Ltd.

The AD feed material had entered road gullies and a piped drainage system, where it impacted approximately 2.3 kilometres of an unnamed tributary of the River Faughan confirming the significant environmental impact caused by the discharge.

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