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All Change

What Labour's Plans for Employment Law Mean for Employers

Update Following King's Speech

July 2024

"It's time for change" was Labour's message in the run up to the election and "Action, not words" the message after it, so now the Labour Party is in power, what might this change all mean for UK employers?

Today, in line with its previous commitment to "hit the ground running", the Labour government announced in the King's Speech that it will be introducing a new Employment Rights Bill within the first 100 days that will "introduce a new deal for working people to ban exploitative practices and enhance employment rights". It will also be introducing an Equality (Race and Disability) Bill that will seek to "enshrine in law the full right to equal pay for ethnic minorities and disabled people and to introduce mandatory ethnicity and disability pay reporting".

In this guide we take a look at the key proposals for change that have been set out by Labour, either in its "Plan to Make Work Pay" before the election (as these will form the basis for the new legislation) or in the King's Speech today. We also provide an update on other employment law changes that were either in the pipeline or under consideration by the previous government for a fuller picture of what might be taking place over the next six to 12 months.

In the Autumn we will be running round table events/webinars looking at some of these proposals in more detail – we will keep you posted.

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Basic Day One Rights

One of the key changes that Labour has promised to make is to introduce "basic individual rights" from "Day One" for all workers (so a broader group than just employees), including the right to claim "unfair dismissal, parental leave and sick pay".

In terms of unfair dismissal, it is not surprising that a Labour government is keen to reduce the period of continuous service required to bring such a claim. Last time we had a Labour government the qualifying period was reduced from two years to one. But scrapping the qualifying period altogether would represent a much more significant change and one that will have significant implications for all employers. Although its length has varied depending on which political party was in power, there has always been a qualifying period for "general" unfair dismissal claims. It was at its lowest (26 weeks) when Labour was in government in the early 1970s, and we are obviously familiar with the two-year limit under previous Conservative governments. Query whether the new government might end up taking a step back from making unfair dismissal a Day One right following any consultation exercise (after which it can say that it has "set the limit in light of responses from all stakeholders" and wasn't in any way just flying a kite in its election manifesto) and ultimately go for six months or one year.

Labour has said its proposals will not prevent employers from carrying out fair dismissals, e.g. for capability, conduct, redundancy, etc. and they will still be able to "assess new hires during any probationary period". So it seems likely it will give employers more flexibility to dismiss during such periods (though that will presumably have to mean some rules around the maximum length of such periods and some limitations on dismissal, as otherwise the commitment to unfair dismissal rights on Day One would be too fundamentally undermined even for a manifesto promise). At this point we start having flashbacks to the statutory dismissal and disciplinary procedures, which were introduced with the best of intentions but ended up being scrapped because, to the surprise of no-one but the people who drafted them, they were unworkably rigid and more complicated than the wiring diagram for Sizewell B.

Any change to the qualifying period would be even more significant if it is combined with Labour's stated aim to extend the right to claim unfair dismissal to all workers (so not just employees). After all, a key reason why businesses engage workers (rather than employees) is to give themselves greater flexibility when it comes to terminating their contracts. Such a change would pose a material threat to the "gig economy" as a whole, about which parts of the Labour Party would not be too sad given proposals to narrow or even remove the distinction between workers and employees across the board.

If more individuals gain unfair dismissal rights, employers will need to ensure that (a) they place more focus on who they are recruiting in the first place – as it will be more difficult to dismiss them if things don't work out; (b) their dismissal policies and procedures (e.g. misconduct, absence management, sickness etc.) are robust so as to minimise the scope for any dismissals being challenged as unfair; and (c) managers are aware of the new rights and trained on how to carry out dismissals fairly.

Labour says that extending protections to workers from Day One will encourage more workers to switch jobs, which is associated with higher wages and productivity growth.

Labour has not said anything about removing the current statutory protection that exists for employers to have "pre-termination negotiations" with employees where the employment relationship is not working out. It should still therefore be possible to bring someone's employment to an end without necessarily going through a full process, but ultimately this is a more expensive way of ending relationships, as individuals will not usually be willing to enter into a settlement agreement and waive any particular claims unless they receive some financial compensation in return.

We discuss Labour's proposals to extend parental leave and sick pay to more individuals below.

Zero Hours Contracts and "One-sided Flexibility"

Tackling insecure work is a theme that cropped up a lot in pre-election communications from the Labour Party and during its period in opposition.

It has said it will ban "exploitative" zero hours contracts – although it is not clear whether this means all zero hours contracts, or just those that are deemed to be "exploitative" (undefined, needless to say). Based on newspaper articles prior to the election, it may be referring to the latter. There was talk that, in response to concerns by business, Labour might take a step back from banning zero hours contracts and instead give workers the ability to "opt" to stay on such contracts. It depends on which survey you read, but around one million people are currently engaged on zero hours contracts in the UK, with younger people more likely to be engaged on them. They are also clearly more prevalent in certain sectors than others, so some businesses will be harder hit by any reforms in this area.

Labour has said it also wants to ensure that all jobs provide a baseline level of security and predictability and ensure everyone has the right to have a contract that reflects the number of hours they regularly work, based on a 12-week reference period. These proposals reflect some of the recommendations made in the Taylor Review of Modern Working Practices back in 2017.

Another change will be requiring employers to give workers reasonable notice of any change in shifts or working time, with compensation that is proportionate to the notice given for any shifts cancelled or curtailed. These proposals reflect previous recommendations of the Low Pay Commission on how to address the imbalance of power between some employers and vulnerable workers as well as proposals in the Taylor Review.

It should be remembered that the previous Conservative government consulted on making a number of these changes, but ultimately took them no further save for a few minor tweaks to the scope for using zero hours contracts.

These changes will clearly increase the administrative burden on companies (requirement to give reasonable notice, keeping records for these purposes etc.) and likely also their financial costs (e.g. if they are required to compensate workers for cancelled shifts). They will also lose flexibility, e.g. from being able to offer work at short notice to individuals to reflect changes in demand, etc. On the flip side, greater income security, predictability, etc. could mean that employers will benefit from a more engaged workforce and improved worker relationships.

It is also worth bearing in mind that the Workers (Predictable Terms and Conditions) Act 2023 is currently due to come into force in the Autumn and this will give workers with unpredictable working patterns the right to make a formal application to change them to make them more predictable. See below for further information. Without some further guidance around what constitutes "unpredictability", this one is already holed below the waterline – though laudable in principle, it remains to be seen whether it can yet be turned into something workable in practice.

"Fire and Rehire"

Labour has said it will end the "scourges" of " fire and rehire" and "fire and replace" (the latter being what happened in the case of P&O, when it replaced employees with agency workers) and replace the statutory Code introduced by the Conservative government (and due with exquisite timing to come into force this week!) with a strengthened code of practice. Such dismissals will only be allowed where "there is genuinely no alternative".

As highlighted in our recent blog, legislating to this effect will be very much easier said than done. It will only work if it is very clear to employers when they can use the process and when they cannot. It also seems a bit like taking a sledgehammer to crack a nut, bearing in mind that in the vast majority of cases dismissal and re-engagement will already only be carried out as a last resort, when attempts to agree any changes have broken down.

Any employer thinking about making changes to its employees' terms and conditions should be aware that the new statutory Code of Practice comes into force tomorrow, 18 July. It sets out the steps that employers should follow where the parties are unable to agree the changes and the employer opts to go down the dismissal and re-engagement route. A failure to comply with the Code could result in an uplift (up to 25%) in any compensation awarded should the matter end up in Tribunal. See the separate briefing note we have prepared on the Code and what it means for employers.

Trade Unions

As you would expect, given the extent of its financial backing by the trade unions, Labour has committed to strengthen trade union rights and protections.

It has said it will update trade union legislation "so that it is fit for a modern economy", removing unnecessary restrictions on trade union activity and ensuring industrial relations are based around good faith negotiation and bargaining. First in the firing line will be the changes made through the Trade Union Act 2016 (which introduced, among other things, higher ballot thresholds for industrial action and additional information requirements relating to industrial action), and then the Strikes (Minimum Service Levels) Act 2023 (which gives the government the ability to make regulations providing for minimum service levels during a strike in certain services provided to the public). It will also abandon plans to reintroduce regulations that allow businesses to engage temporary staff during a strike, something the Conservative government was seeking to reintroduce, having had a previous set of regulations quashed by the courts.

Other changes that have been promised include: (a) the introduction of electronic balloting; (b) giving more workers the ability to organise through trade unions by simplifying the statutory recognition process; (c) removing the rule that means unions must show at least 50% of workers are likely to support their claim before the process has begun; (d) new rights for trade unions to gain reasonable access to workplaces to allow them to meet, represent, recruit and organise members, provided they give appropriate notice and comply with reasonable requests of the employer; (e) a new duty on employers to inform all new employees of their right to join a union, and to inform all staff of this on a regular basis. This information will be included as part of the s.1 statement of written particulars that must be given to all new workers when they start a new job; (f) new rights and protections for trade union representatives, including a new statutory right for trade union equality representatives to strengthen equality at work; and (g) changes to the blacklisting rules.

All in all, employers should prepare themselves for stronger trade unions with greater rights and protections.

Enforcement

Single Enforcement Body – Labour has said a key priority will be creating a Single Enforcement Body, also known as a Fair Work Agency, with the power to inspect workplaces and levy fines. In an interview prior to the election, Angela Rayner, now Deputy Prime Minister, said the new body will have "real teeth".

This was a proposal originally floated as part of the Taylor Review of Modern Working Practices and something that the previous Conservative government had committed to introducing, before putting the proposals on hold. Obviously, compliant employers would notionally have nothing to fear from this, but companies could still face the administrative and financial burden of having to defend any complaints raised with such a body, even if they are without merit. On a more positive note, a Single Enforcement Body (provided it is properly funded) could help bring greater consistency across all areas of enforcement. We know that employers would also welcome greater resources to support them in complying with their obligations.

Employment Tribunals – Labour has said it will improve and strengthen enforcement through Employment Tribunals to provide quicker and more effective resolutions. This will not be an easy task, especially in light of the current backlogs in the system. The Tribunal system will also inevitably be put under even more pressure if Labour presses ahead with all its proposals for reform, as they will inevitably lead to an increase in claims.

Labour has previously said it will increase the time limit within which employees can make an employment claim from three to six months. This would only serve to add to these backlogs, as the number of claims are likely to increase further if employees have more time within which to bring them (there would be no point in the change if that were not the intention).

Existing backlogs are already leaving businesses and employees in a state of limbo for far too long. Currently, many claims are being listed for 2025 at the earliest, with week-long cases in parts of the country currently being listed as far away as 2026. One of the key issues, apparently, is the lack of judges, especially in the Southeast. Ultimately it will not matter how many shiny new rights Labour's changes will confer on employees if there is no practical means of enforcing them. Unless there is very substantial investment in the Employment Tribunal system, from venues to clerks and judges, these commitments will just be empty words.

Equality at Work

A key proposal in the equality sphere relates to pay gap reporting. Labour has committed to requiring large firms (presumably those with 250 or more employees so as to align with the current reporting requirements) to develop, publish and implement action plans to close their gender pay gaps. It has also said it will require employers to report on their outsourced workers, both from a gender pay gap and pay ratio reporting perspective, which will make things much more complicated for affected businesses.

As highlighted above, there will also be a new Equality (Race and Disability) Bill that will introduce mandatory ethnicity and disability pay gap reporting for larger employers (250+ employees), to mirror gender pay gap reporting. Labour has also promised to extend the right to make equal pay claims to include the protected characteristics of race and disability, which represents a significant change.

Although many UK employers currently try to collect and track diversity data about their staff to support them in their DEI initiatives, this is in no way universal and employers still find that some individuals are reluctant to provide it. Employers are going to have to re-double their efforts to obtain this data.

Large employers will also be required to produce Menopause Action Plans setting out how they will support employees through the menopause, but Labour does not appear to be seeking to resurrect the proposal to make the menopause a protected characteristic under the Equality Act 2010.

In its Plan to Make Work Pay, Labour talks about reintroducing protection to prevent harassment at work by third parties and changing the forthcoming new mandatory duty from taking "reasonable steps" to prevent sexual harassment in the workplace to "all reasonable steps", which clearly places a very much more onerous obligation on employers.

Worker Status

The UK currently has three main types of employment status, with individuals classified as employees, workers or fully self-employed.

Labour has indicated that it wants to abolish the current separate statuses of employee and worker and move towards a single status of worker. This is not something that it will seek to do straight away apparently (and there was no specific reference to this in the King's Speech), as it acknowledges that such a change will take longer to review and implement. It will also be much more difficult to legislate for, as the previous government discovered when it carried out its consultation on employment status and ended up concluding that while everyone agreed that reform was necessary no-one could agree on what that reform should look like. It would also be hideously complex to implement any reform on this issue.

Labour's Plan to Make Work Pay said that it will strengthen the rights for the self-employed, including the right to a written contract "which would benefit freelancers".

Family-friendly Rights

In its Plan to Make Work Pay, Labour said that within the first year of being in government it will review parental leave and ensure that parental leave is also a Day One right. When it refers to "parental leave", it appears to be talking about family-friendly leave more broadly, rather than simply the statutory right to take unpaid parental leave to care for a child. Again, the Conservative government previously consulted on "high-level options for reforming parental leave and pay with a view to achieving greater equality in parenting and at work", but these were put on hold because of the pandemic and the government's desire at that time not to increase the burden on employers.

Maternity and adoption leave are, of course, already Day One rights. It is only paternity leave and shared parental leave that currently require an employee to have at least 26 weeks' continuous employment before they are eligible to take it.

A number of other related proposals by Labour have been superseded to a certain extent by recent legislative changes in this area. For example, providing protection from redundancy for women returning from maternity leave (although Labour has said it will go further and make it unlawful to dismiss a woman returning from maternity leave for six months after her return except in specific (and as yet unexplained) circumstances – as opposed to simply obliging the employer to offer her alternative employment where there is a suitable vacancy); introducing carer's leave (although this is currently unpaid and Labour has said it will examine the benefits of offering paid leave); and bereavement leave (although this is currently only available to working parents who lose a child and Labour has talked about extending it to anyone who experiences a family bereavement). None of these changes except the first will have a significant impact on employers if ultimately introduced.

Flexible Working

Labour has indicated it will make flexible working "the default from Day One for all workers" (as opposed to the "right to request" flexible working), with employers required to accommodate this as far as is reasonable. Regardless of the precise form of the right, it seems unlikely that it will oblige employers to accept flexible working where they can point to one or more of the existing permissible reasons for saying no in section 80G of the Employment Rights Act 1996.

Pay

Minimum wage – In the briefing notes that accompany the King's Speech, Labour has promised to deliver a genuine living wage that people can live on. It has previously said that in the first instance it will write to the Low Pay Commission to change its remit and require it to take account of the cost of living when making its recommendations for the minimum wage rates, alongside median wages and economic conditions.

It has indicated that it will also remove the age bands to ensure every adult worker benefits from the same rate – although again, some progress has already been made in this area, as in April 2024 the threshold for the National Living Wage was lowered from 23 to 21 years. There are now therefore only two different adult bands – the National Living Wage and the 18–20-year-old rate. Any further increase in wage costs is likely to be resisted by employers, especially in certain sectors such as hospitality.

As highlighted above, the government's new proposed Single Enforcement Body will also have new powers to ensure the minimum wage is enforced, including penalties for non-compliance.

Labour has said it will also work with the Single Enforcement Body and HMRC to ensure the National Minimum Wage regulations on travel time in sectors with multiple working sites are enforced.

Tips – Labour has previously said it will strengthen the law to ensure hospitality workers receive their tips in full and workers decide how tips should be allocated. With new legislation on this issue due to come into force on 1 October 2024 anyway, together with a new statutory Code of Practice, this proposal seems to have been largely overtaken by events. For more information on these new rules, see our recent guide: New Obligations on Employers When Allocating Tips. Commencement regulations will, however, need to be issued to formally bring the relevant provisions of the Act into force and the new Code of Practice, but as this legislation will give workers greater rights (and is consistent with the thrust of Labour's wider ambitions) it seems inevitable that Labour will press ahead with these changes.

Statutory Sick Pay (SSP) – Labour has said it will remove the lower earnings limit on SSP to make it available to all workers and also remove the current three-day waiting period. These changes will end up costing employers more, as ultimately many more workers will be eligible to claim SSP – especially in light of the current increase in sickness absence levels in the UK. There has to be a risk that some employers may reduce their current company sick pay offerings to offset any increases in their SSP costs. Having said that, previous CIPD research suggested that the majority of UK employers would support these changes, alongside a wider review of the sick pay system. Previous estimates suggested that approximately two million people in the UK do not qualify for SSP at all, and 10 million do not receive any pay during the first three days of sickness absence.

As with a number of the other changes proposed by Labour, changes to the SSP regime are something that the previous Conservative government also toyed with, having issued a Call for Evidence on these issues in 2023.

Redundancy Rights and TUPE

In its Plan to Make Work Pay, Labour said it will strengthen redundancy rights and protections, for example by ensuring the right to redundancy consultation (presumably collective consultation) is determined by the number of people impacted across the business rather than in one workplace or "establishment". This would take us back to the position following the EAT's decision about the Woolworths collapse in 2013, in which it held that collective consultation obligations were triggered when 20 or more employees across a whole organisation were proposed for redundancy, rather than 20 more employees at one particular site or location. It would also not be consistent with European case law, not that we are bound by that any longer. Such a move would not be good news for UK employers and would make things very difficult both legally and practically for multi-site employers. No specific reference was made to this in the King's Speech today. If it does go ahead with these proposals, we have to hope that a consultation exercise will flush out these challenges – after all, there appear to be no significant concerns with the current legal position.

Labour has also previously committed to "strengthen" the existing set of rights and protections for workers subject to TUPE processes, but we have had no early indications of what this might look like and presumably it will be low down on their list of priorities.

On 16 May, the Conservative government issued a consultation document seeking views on reforms to TUPE that would clarify that (i) the TUPE Regulations only affect employees, not workers; and (ii) where a business/service is split between multiple transferees there is no associated "splitting" of any employment contracts between multiple employers. Both of these proposed changes were in response to previous case law that had muddied the water in these areas. The consultation closed on 11 July. We do not yet know whether this new government will press ahead with these changes. They are arguably more "business-friendly" than "worker-friendly", but we will have to wait and see. The first point would become otiose if Labour abolishes the worker status, and the latter would serve everyone, in particular the employee, a great deal of cost and heartache trying to work out which transferee is responsible for what piece or proportion of the employee's contract. The case law in question made reasonable sense as an exercise in academic absolution, but its practical product was completely unworkable. Some early brownie points available for Labour here in letting that second reform go through.

Artificial Intelligence (AI)

Labour has committed to working with workers, trade unions and employers to examine what AI and new technologies mean for work, jobs and skills, and how to promote best practice in safeguarding against the invasion of privacy through surveillance technology, spyware and discriminatory algorithm decision making. As a minimum, it will ensure that proposals to introduce surveillance technologies would be subject to consultation and negotiation with trade unions or elected staff representatives where there is no trade union and that this is "with a view to agreement" meaning that the consultation must be genuine even if, in the end, the employer is not bound to agree.

Miscellaneous

Whistleblowing – Labour has promised measures (still unparticularised) to strengthen protection for whistleblowers, including by updating protections for women who report sexual harassment at work.

Right to switch off – In its Plan to Make Work Pay, Labour said it will bring in the "right to switch off" along the lines of changes that have been introduced in Ireland and Belgium, giving workers and employers the opportunity to have constructive conversations and work together on bespoke workplace policies or contractual terms that benefit both parties. It is not clear at this stage whether, if such a right is introduced, it will take the form of a new statutory right or, as is the case in Ireland, a more-light touch approach such as a Code of Practice, which does not in itself create standalone rights but can be taken into account by a court or tribunal in relation to other claims. It is fervently to be hoped that any statutory moves in this arena follow a long and genuine consultation process, and that this particular can of worms is not opened in a rush just for a swift political win. The impact on how a large proportion of the UK workforce operates is potentially enormous and there are powerful economic and organisational reasons for not going down this path, however superficially attractive it may seem.

Apprenticeship Levy – In the King's Speech, Labour said it will reform the Apprenticeship Levy (which will presumably be welcomed by employers). It previously talked about creating a "Growth and Skills Levy", under which companies would have the ability to use up to 50% of their total levy contributions on non-apprenticeship training, with at least 50% reserved for apprenticeships.

Internships – Labour has previously talked about banning unpaid internships except when they are part of an education or training course.

Other Potential Future Developments

It is also important that we do not forget about various other employment law changes that are currently in the pipeline, some of which are due to come into force later this year. Below is a quick "heads-up" on other key changes that have previously been promised and the current state of play in relation to them.

- **Sexual harassment in the workplace** – The new mandatory duty to take "reasonable steps" to prevent sexual harassment in the workplace will come into force on 26 October. The Equality and Human Rights Commission has recently issued a consultation on changes to its technical guidance in relation to this new obligation on employers.
- **Predictable terms and conditions** – The Workers (Predictable Terms and Conditions) Act 2023 received Royal Assent last year and is due to come into force in Autumn 2024. As this is a measure that will grant greater rights to workers, it seems likely that the new government will press ahead with these changes.
- **Non-competition clauses** – The Conservative government had said it would limit the maximum duration of non-competition covenants in UK contracts of employment and limb (b) worker contracts to three months. No draft legislation has been forthcoming, perhaps because it was a really daft idea, and it seems unlikely this will be a priority for the new government.
- **Neonatal care leave and pay** – The Conservatives' Neonatal Care (Leave and Pay) Act 2023 will introduce new rights to leave and pay for employees with responsibility for a child who is receiving, or has received, neonatal care. The draft regulations that will set out the full details of the new protections had not been published prior to the election, but presumably they will be issued by Labour at some point, as these new protections fit with its broader agenda. These changes are most likely to come into force in April 2025, as HMRC needs time to set up the necessary payment systems.
- **Employment Tribunal fees** – A consultation on reintroducing Employment Tribunal fees had been issued, but this will presumably be swiftly dropped now that Labour is in government despite the need highlighted by these proposed new rights for urgent and substantial investment in the Tribunal system.
- **European Works Councils (EWCs)** – Following the UK's departure from the EU, the Conservative government legislated to prevent the establishment of new EWCs in the UK, but there was still scope for existing EWCs to continue. This resulted in case law and the rather unsatisfactory situation whereby around 70 employers operating in the UK were required to have two EWCs, one under UK law and one under EU law. In response to this, the Conservative government issued a consultation document proposing the repeal of the legal framework for EWCs in the UK, including a repeal of the current requirement to maintain existing EWCs. The consultation closed on 11 July. We have not seen any commentary from Labour specifically in relation to EWCs. It is possible that these proposals may not be implemented, as they are likely to be seen in some quarters as reducing worker protection. Having said that, as trade unions may see EWCs as watering down their own influence in the workplace, there may be less pressure from them to retain the status quo. For those large multinational companies with established EWCs in other EU countries, note that the European Commission has recently proposed changes to the Directive to make employees' rights to information and consultation in transnational contexts more effective and to further improve social dialogue in the EU.

Key Takeaways for Employers

- **Be prepared for change** – Labour won the election with a large majority and is ambitious to make a difference after having been in opposition for such a long time, so changes in the employment law sphere are inevitable.
- **Engage loudly with any consultation exercises conducted by the government in relation to any proposed changes to employment law –** These will be a critical way for businesses to make the government aware of the implications of some of their more radical proposals. While Labour is clearly keen to enhance worker rights and protections, it has also said that it is fully committed to consulting fully with businesses and workers on how to put its plans into practice before any legislation is passed.

This guide sets out the position in England. The position may vary in Scotland, Wales and Northern Ireland.

If you have any questions about any of the above, please speak to your usual contact in the Labour & Employment team or one of the following:

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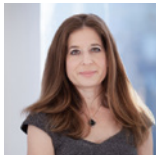

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