

Strategic plan

2025–28

Equality and Human Rights Commission

Strategic plan 2025–28

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Foreword from our Chairwoman

I am delighted to introduce the Equality and Human Rights Commission's new strategic plan for 2025 to 2028.

We are grateful to every individual and organisation that contributed to the consultation we ran on our draft strategy last year. We carefully considered all the views shared with us as we planned how to best safeguard and promote equality and human rights, so that everyone gets a fair chance in life.

The work we do today builds on a long history of progress. This year it will be 60 years since the Race Relations Act, 50 years since the Sex Discrimination Act, 30 years since the Disability Discrimination Act and 15 years since the Equality Act 2010. The Human Rights Act is approaching its 30th anniversary, due in 2028.

Similarly, the Equality and Human Rights Commission itself will mark its 20th anniversary within the lifetime of this strategic plan.

We can be proud of the work we have done and the steps we have helped Britain take towards becoming a fairer country.

But we know there are still challenges to achieving equality and human rights improvements. Problems such as harassment in the workplace persist, and significant new opportunities and threats are emerging, including from the advance of artificial intelligence (AI) and other technologies. Meanwhile, some equality and human rights issues continue to be politically contested, and public discourse remains polarised.

Since 2010, our budget has decreased while our regulatory duties have continued to expand. Our strategic plan is therefore based on a fundamental premise: we need to make best use of our limited resources to fulfil both the mission set for us by the Equality Act 2006 and our role as a National Human Rights Institution, all while discharging the additional responsibilities given to us by successive Parliaments.

That means prioritising action where there is clear evidence of need, where we have a unique contribution to make and a good prospect of creating positive change. This plan demonstrates our focus on our core obligations, responding to issues that arise and programmed activity to tackle complex challenges.

To deliver on this approach we must be an agile, independent and authoritative regulator, able to make regulatory decisions and respond quickly to new challenges.

We will hold governments, public bodies and businesses that break the law to account. We will keep using data and evidence to understand the context in which we work, prioritise our actions and robustly review our impact on the lives of the people we serve.

We look forward to continuing to work with all those who can help deliver progress towards our vision of a society where everyone can live well and live well together.

While my own term as Chair of the Equality and Human Rights Commission will end later this year, I am confident that this plan puts us in the strongest possible position to deliver for all the people of this country in the years ahead.

Baroness Kishwer Falkner
Chairwoman



Photo: Lucy Young

Protecting and promoting equality and human rights

1. Our vision and purpose

Our vision: A society founded on equality and human rights where everyone in Britain has the opportunity to live well and to live well together.

Our purpose: To safeguard and promote our equality and human rights protections so that everyone gets a fair chance in life.

How we work: In everything we do, we aim to be agile, independent and authoritative.

1.1 Our duties, powers and governance are set out in statute in the Equality Act 2006.

1.2 Our duties include:

- promoting equality and diversity
- protecting and promoting human rights
- monitoring the effectiveness of equality and human rights legislation
- publishing reports on progress in society

1.3 As a regulator, we hold governments and other duty bearers to account. We aim to ensure that they recognise and adhere to equality and human rights laws. This means that we:

- seek to ensure they meet their equality and human rights obligations
- interpret and assess compliance with the law and the effects and application of the law
- promote awareness, understanding and protection of human rights and encourage public bodies to comply with the Human Rights Act 1998
- where necessary, enforce the law by taking action against those who break it

Duty bearers are organisations or individuals who have obligations or responsibilities in relation to equality and human rights law.

This includes governments, businesses and public authorities like the police.

- 1.4** As a national equality body and a National Human Rights Institution (NHRI), we maintain independence from governments and civil society.

How we work across England, Scotland and Wales

We are Britain's national equality body and an NHRI, established to promote and uphold equality and human rights laws and standards across Britain. In Scotland, we have a human rights mandate in relation to matters that are reserved to the UK Parliament. The Scottish Human Rights Commission has a mandate to promote and protect human rights that are within the competence of the Scottish Parliament.

We have a single strategy and one-organisation approach to delivery. We recognise the different challenges and opportunities in England, Scotland and Wales and adapt the way we deliver our work accordingly. We look for unique opportunities to create impact in devolved administrations. A Scotland Commissioner and a Wales Commissioner chair statutory committees. The role of these committees includes advising us on how our work affects Wales and Scotland.

Our regulatory model

1.5 Our regulatory model describes how we use our powers and statutory functions, including as an NHRI, to improve equality and human rights and enforce the law. Our powers differ between equality and human rights. This model helps us to plan our work, identify and measure our achievements and will continue to provide a foundation for our work under this strategic plan.



Prevention

We provide evidence and advice early on so that action can be taken to prevent more serious issues developing.



Remedial action

When problems occur we work to change behaviours and take legal action if needed.

 <p>Evidencing the issues</p>	 <p>Influencing standard setting</p>	 <p>Ensuring compliance with standards</p>	 <p>Enforcing the law</p>
<p>We inform the decisions and actions of governments, parliaments and others by providing data and evidence on equality and human rights.</p>	<p>We advise governments, regulators and others on how to improve systems and processes to promote equality and human rights through regulatory frameworks and standards.</p>	<p>We provide information, guidance and advice to support organisations to meet their duties under equality and human rights law. We help individuals to understand their rights.</p>	<p>We take action against organisations that break equality and human rights law. We hold them to account, secure justice for people whose rights have been breached, and aim to bring about wider compliance with the law.</p>

2. The context

2.1 Our work is built on a long history of progress. During this strategic period, there will be the following anniversaries of landmark legislation.

In 2025 it is:

- 60 years since the Race Relations Act
- 55 years since the Equal Pay Act
- 50 years since the Sex Discrimination Act
- 30 years since the Disability Discrimination Act
- 15 years since the Equality Act 2010

The 20th anniversary of the Equality Act 2006 is in 2026, our 20th anniversary at the Equality and Human Rights Commission (EHRC) is in 2027 and the 30th anniversary of the Human Rights Act is in 2028.

2.2 Our work has shown that between 2013 and 2023 almost every group in Britain experienced a reduction in severe material deprivation. Employment gaps have reduced for disabled people and most ethnic minority groups have seen a continuation of improvements in educational outcomes.

Severe material deprivation is defined as being unable to afford a minimum number of basic necessities, such as keeping accommodation sufficiently warm and replacing worn-out furniture.

2.3 However, the COVID-19 pandemic caused unprecedented economic and social disruption with both short- and long-term effects, contributing to falling life expectancy in some groups. The advance of technology has brought new opportunities and threats to rights. Equality and human rights continue to be the subject of intense political debate. Public discourse on equality and human rights has become increasingly polarised, making our work even more critical.

2.4 In this context, we have continued to refine our role to maximise our influence. Since we were established, our mandate has remained largely consistent and our objectives increasingly embedded in British society and practice. However, since 2010, our budget has decreased while our regulatory duties have continued to expand, which increases the pressure on us to prioritise.

3. Our approach

3.1 This strategic plan is based on a fundamental premise: we need to make the best use of our resources to fulfil the mission set out for us in the Equality Act 2006. That means focusing on issues where:

- there is clear evidence of need
- we have a unique contribution to make
- there is a good prospect of creating positive change

3.2 To do this, we need to be agile, independent and authoritative.

Agile: We will proactively protect and promote equality and human rights. We will develop our approach to decision making to act quickly and effectively deploy the right regulatory tools when faced with new equality and human rights challenges.

Independent: We will reinforce our independence by acting in a fair and impartial way and by monitoring, reviewing and relying on evidence. We will hold duty bearers, governments and those who break the law to account. We will listen to a diverse range of stakeholder voices to support us in delivering impartial regulatory interventions. We will continue to advocate for changes to our relationship to UK government, including around our budget and board appointments, to enhance our independence.

Authoritative: We will continue to invest in becoming an evidence-led regulator, using data and evidence to understand the world in which we work. We will prioritise our actions and robustly review our impact. We will strengthen the evidence base on the current state of equality and human rights and make it available for others to use.

Our strategy

3.3 Over the period of this strategic plan we will focus on our principal purpose and duties:

- promoting and protecting equality, diversity and human rights
- monitoring the effectiveness of legislation
- reviewing how Britain is performing on equality and human rights

3.4 We will take an evidence-based approach that considers our powers, our potential to drive impact and our analysis of equality and human rights priorities.

- 3.5** We will be open and collaborative, communicating clearly and confidently with the public about their rights. We will engage with other organisations to deliver our mandate, taking joint action with other regulators and helping them to build equality and human rights into their own regulatory frameworks.
- 3.6** We will support mutual respect between groups based on understanding and valuing of diversity and shared respect for equality and human rights. We will fulfil our role as an NHRI as outlined in the Paris Principles.
- 3.7** We will organise our work under three 'pillars':
- **Pillar One:** Core regulation of equality and human rights
 - **Pillar Two:** Agile response to equality and human rights risks and opportunities
 - **Pillar Three:** Programmes focused on complex equality and human rights challenges

Pillar One: Core regulation of equality and human rights

- 3.8** We will deliver a core programme of regulation to support compliance with equality and human rights law.
- 3.9** By maintaining and promoting an authoritative and comprehensive evidence base, including through the Equality and Human Rights Monitor and human rights treaty monitoring, we will increase understanding of the most significant equality and human rights challenges. We will evolve our approach to data analysis, including a dynamic data dashboard, topical deep dives and insights on emerging issues throughout reporting cycles. We expect to publish the next Equality and Human Rights Monitor in 2028.
- 3.10** By ensuring our core guidance and codes of practice are clear, comprehensive, practical and up to date, we will provide duty bearers with the essential tools to comply with the law and help them understand their specific obligations.
- 3.11** Our work will:
- a) Improve compliance with the Public Sector Equality Duty (PSED). We will undertake a programme of monitoring and engagement to increase compliance and ensure that public authorities are seeking to eliminate unlawful discrimination, promote equality of opportunity and foster good relations between groups. Where necessary, we will use our enforcement powers to challenge non-compliance.

- b) Build accountability for improved implementation of human rights treaty obligations. We will act to improve human rights protections, using the UK and Welsh governments' treaty obligations to drive change. We will also increase accountability by using, and supporting others to use, our online Human Rights Tracker.
- c) Increase transparency around pay gaps. We will interrogate suspect data and follow up on non-reporting of data. We will evidence the influence of pay gap reporting on narrowing pay gaps and build an understanding of effective approaches.

3.12 We will also deliver a planned programme of specific enforcement of the Gender Pay Gap Information Regulations, Public Sector Bodies Accessibility Regulations and breaches of the Equality Act 2010. We will continue to act as a prescribed body for whistleblowing in relation to equality and human rights. We will deliver a targeted package of activity around the sexual harassment preventative duty following changes to the law made by the Worker Protection Act 2023. We will fulfil future responsibilities given to us by Parliaments in legislation as they emerge, subject to our resources.

As a result of our work under Pillar One we anticipate:

- demonstrable commitment to the PSED from all levels of government and public authorities
- focused action from duty bearers to tackle unlawful behaviour, promote equality and improve community relations
- the adoption of measures that fulfil human rights treaty commitments, giving people better protections in their day-to-day lives
- consistent and universal compliance with gender pay gap reporting requirements

Pillar Two: Agile response to equality and human rights risks and opportunities

3.13 To respond effectively to equality and human rights risks and opportunities, we will be both strategic and agile. We will prioritise our work carefully to address the most significant and urgent threats to equality and human rights. We will also take evidence-driven decisions and consider how to make the most of our regulatory tools, including our legal and enforcement powers.

3.14 By doing this, we will robustly challenge unlawful policies, practices and behaviour across our remit. We will contribute positive changes to policy, legislation and guidance across all three nations. We will work with a range of duty bearers, including Parliaments, governments and other regulators. We will generate examples of good practice. Our work will reduce discrimination and breaches of human rights.

3.15 We will do this by:

- being an authoritative voice for equality and human rights, including emphasising the importance of rights to individuals, local communities and wider society
- assessing serious threats to equality and human rights, for example ensuring AI does not lead to discrimination on the basis of race, and rooting our decision making in evidence
- identifying and acting where we can achieve impact and where the use of our regulatory powers will be most effective, within the constraints of our limited budget
- developing our capability to respond quickly, to address the pressing issues that are affecting people's everyday lives

As a result of our work under Pillar Two we anticipate:

- clarification and better understanding of equality and human rights law
- improved compliance and fewer breaches in the law, protecting people from harm
- legislation and policy developed with equality and human rights risks mitigated against, ensuring society develops in line with these fundamental values

Pillar Three: Programmes focused on complex equality and human rights challenges

- 3.16** Under this pillar, we will deliver planned long-term programmes, using a range of our regulatory tools to address complex and persistent equality and human rights challenges.
- 3.17** By taking a focused approach on topics and sectors, we will contribute to measurable long-term improvement in people’s experiences of equalities and human rights.
- 3.18** We have identified three areas in which there is a strong prospect of positive change. Our limited resources have meant that we have had to make difficult prioritisation decisions. Within these programmes there are unique opportunities for us to apply our regulatory model and achieve impact. Responses to our public consultation showed support for work in these areas and evidence demonstrates that there is a need for change.

Programme 1: Tackling harassment, discrimination and victimisation in the uniformed services

Racial and sexual harassment, discrimination and victimisation remain entrenched in the workplaces of the fire and police services and the armed forces, despite previous critical reports. We will improve data, work with other regulators, conduct Public Sector Equality Duty (PSED) implementation pilots and monitor compliance.

Programme 2: Clarifying the law and supporting effective responses to balance of rights, including freedom of expression

Human rights reflect and protect the dignity of all. This lays the foundations for our society, built on the values of equality, liberty and the rule of law. In recent years, there have been social tensions and disputes around issues that engage the rights of multiple groups, such as the introduction of safe access zones around abortion clinics. We will play an authoritative, impartial role in clarifying the law and in advising how to shape the law in a way that respects everyone’s rights.

Where tensions between different groups in society are heightened, we will increase national and local governments and PSED duty bearers’ understanding of how best to respond. We will select a small number of issues on which to focus, such as freedom of expression and the interaction between the protected characteristics of sex and gender reassignment. Through this programme, we will foster wider respect for, and enjoyment of, human rights.

Programme 3: Strengthening participation in society by addressing barriers to key public services

It is important that services such as public transport are accessible so that people can participate actively in society. However, for many protected characteristic groups, there are significant barriers to accessing these services. For example, older and disabled people can face barriers when accessing rail or bus travel, and digital delivery can present barriers for those who are digitally excluded.

We will start by scoping possible interventions, initially in the transport sector, to ensure we target our actions well. Over the course of the three-year plan, we will use the breadth of our regulatory tools so individuals and duty bearers understand their rights and obligations. We will also work closely with relevant service providers to reduce barriers and hold them to account when they act unlawfully.

As a result of our work under Pillar Three we anticipate:

- workplace cultures and practices that make the uniformed services safe and free from discrimination and harassment
- informed and responsible engagement on balance of rights issues, including effective policy and legislation
- accessible services and facilities that improve participation in society

4. Strengthening our organisation

- 4.1** In the last strategic plan period, we improved our approaches to hybrid working through our estates and ICT. We developed our people's skills, knowledge and experience and improved our governance, decision making and accountability structures.
- 4.2** We will build on this work to increase productivity and use public money in the most efficient way. We do not anticipate any significant increase in our budget over the course of this strategic plan, with early indications that we will receive close to a flat cash settlement for at least the first year of the plan, compared with our 2024–25 settlement. We know this means that we will need to continue work to improve our efficiency, ensuring that we can make the best use of our people and taking opportunities to use technology to strengthen our regulatory and corporate delivery.
- 4.3** In 2025–28, we will further strengthen the EHRC to be an agile, independent and authoritative regulator. We will continue to invest in our management and leadership both generally and in specialist areas such as legal and regulatory expertise. This will enable us to be more responsive and to target our delivery even more effectively.
- 4.4** We will review our tools and systems so everyone is supported to do their job well and so that we can more effectively engage external stakeholders and tackle wrongdoing and harm. This will include further technology improvements and using our offices to work collaboratively. For example, we will explore how we might use AI responsibly to improve our own efficiency and effectiveness.
- 4.5** As we focus on delivering our core work, responsive activity and longer-term programmes we will further refine our prioritisation, delivery and reporting mechanisms. This will ensure that we deploy our resources in ways that maximise our potential for impact and assess where we are achieving that impact. We will invest in systems and processes that support us to be agile in redirecting resources if priorities change. We will build on our collection and use of data to improve our understanding of equality and human rights issues. This will further inform how we should respond to long-term and emerging issues.
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As a result of our work strengthening our organisation we anticipate:

- an environment in which our people can thrive and deliver effectively and efficiently across our remit
- deployment of our regulatory tools to address new and pressing equality and human rights issues to achieve change
- maintaining our impartiality and 'A status' National Human Rights Institution accreditation

