

Annual report and accounts

2024–25

Equality and Human Rights Commission

Annual report and accounts 2024-2025

For the period 1 April 2024 to 31 March 2025

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Chairwoman's Foreword

The work we do at the Equality and Human Rights Commission (EHRC) to shape a fairer Britain is more important than ever. Human rights continue to be the subject of intense political debate. Around the world, narratives opting for division over diversity are gaining support. This puts our role – as Britain's equality regulator – in the spotlight. It is therefore imperative we continue to firmly protect and promote the rights of people across the country.

This is my final year as Chairwoman of the EHRC, and my final annual report. The report is a timely marker of our transition to a new strategic plan. This year we closed the chapter on our 2022 to 25 strategic plan to begin a new one, launching our 2025 to 28 strategic plan in March 2025.

In our 2022 to 25 strategic plan, we set out to make a positive, lasting difference to the lives of people across Britain. I'm immensely proud to reflect on the impact we made during this period, covering this and previous Annual Report and Accounts, to protect and improve people's rights.

One of the key priorities for the strategic plan was to ensure people were not subject to discrimination, harassment and victimisation in the workplace. Our efforts to help employers prevent harassment at work have been far-reaching. We have encouraged household names like IKEA UK, McDonald's and Welsh Rugby Union to comply with their duties under the Equality Act 2010.

Our 2022 to 25 strategic plan also aimed to address the equality impact of digital services and emerging technologies like artificial intelligence. Building on landmark legal cases that have highlighted the risks of discrimination from ill-considered use of technology, we have worked with local authorities and others to develop guidance that helps them limit the risk of discrimination in artificial intelligence.

We spent much of the year updating our Code of Practice for services, public functions and associations. The Code of Practice sets out the important steps that should be taken by duty-bearers to ensure people are not discriminated against. It reflects significant updates in legislation and case law since it was first published in 2011. I am grateful to the many stakeholders who shared their insights during our consultation period to shape our authoritative guidance and help support duty-bearers to uphold everyone's rights.

The Supreme Court judgment in the For Women Scotland case brings clarity to the long-contested issue of the definition of sex in the Equality Act. We intervened in the litigation to assist the Court and were pleased that the Court endorsed much of our legal analysis. We are now working at speed to update our guidance to ensure that the law can be fully understood by those who need to comply with it. The public interest around the judgment and its aftermath reinforces the importance of the EHRC as an impartial authoritative source of guidance on the law.

Our impartiality and independence were further endorsed when the Sub Committee on Accreditation of the Global Alliance of National Human Rights Institutions reaffirmed our 'A' status following a special review in 2024. We continue to take seriously our obligations under the Paris Principles and act independently of government – we have held governments at Westminster and in Scotland and Wales to account in the last year on their compliance with equality and human rights legislation and treaty obligations – and of civil society.

I would like to extend my heartfelt thanks to every person working in the Commission, the Board, Committees, and external organisations who help us fulfil our responsibilities as Britain's equality regulator. Over the year, we said farewell to Commissioners Jess Butcher, David Goodhart and Su-Mei Thompson who left their positions on the Board at the end of November 2024. I am truly grateful for their service to the EHRC, including their invaluable contribution to our Equality and Human Rights Monitoring report. We also welcomed Commissioner Keith Richards to the Board. I'm proud of all that colleagues at the EHRC have achieved together to help Britain become a fairer country – and all we will continue to achieve in the coming years.

It has been a privilege to lead the Commission since 2020 and I am delighted to leave behind a legacy of having championed equality for all – in the best public service tradition, while also having transformed it internally to make it credible and relevant. It gives me great pride to know that the EHRC will remain in the hands of those who are just as firmly committed to upholding equality and human rights. At the beginning of my tenure, former Chair, Sir Trevor Phillips, described the role as one of the most difficult jobs in the public sector. He was not wrong. But it is, by far, the most valuable job I have done – and the one I am most proud of. I hope that my successors will find it just as rewarding and I wish them the best of luck for the opportunities and challenges ahead.

Baroness Kishwer Falkner
Chairwoman



Photo: Lucy Young

Chief Executive's Foreword

The launch of this annual report marks my first full year as Chief Executive of the Equality and Human Rights Commission. It has been a pleasure to work closely with the people at the heart of protecting equality and human rights in that time, and to see the variety of ways our powers can be used to achieve that aim.

The breadth of our responsibilities and the decisions we must make to discharge them are clearly demonstrated within this report. They are also illustrated by our new strategic plan for the period 2025 to 28, which we published following public consultation in March 2025. This reinforces the need, in an environment where our resources are increasingly constrained, for us to prioritise our core work, our ability to respond to the key issues of the day and to tackle persistent systemic challenges.

An important part of our remit is to hold governments and public bodies to account, and in the last year we did so without fear or favour. Take, for example, our investigation into the Department for Work and Pensions (DWP). We launched the investigation in May 2024, due to suspicions that successive Secretaries of State may have broken equality law by failing to make reasonable adjustments for disabled people. While the investigation is still ongoing, our action reflects the EHRC's commitment to using its strongest enforcement tools to uphold the rights of disabled people.

That enforcement activity started under the previous government. But we have challenged the new government at Westminster by assessing the equality impact of tax and spend measures. We have challenged the Scottish Government's role in ensuring that NHS Scotland and other public bodies meet their obligations under the Equality Act. And we have challenged the Welsh Government on free school meals provision and women's representation in the Senedd.

Elsewhere in the public sector, we have worked to make higher education fairer and safer for disabled students. Following our intervention in the case of University of Bristol v Abrahart which found the University had failed to make reasonable adjustments for disabled student Natasha Abrahart, contributing to her tragic death, we issued updated guidance to higher education institutions. Together with Natasha Abrahart's parents, we have supported higher education institutions to become safer, more inclusive environments where every student can thrive.

Through our race discrimination fund, we have supported individuals who may not otherwise have been able to access justice, and at the same time clarified and strengthened the law. For example, we provided funding and assistance to former Corporal Kerry-Ann Knight after she experienced racist and sexist abuse in the Army. Subsequently, Ms Knight received an apology and a substantial financial settlement from the Ministry of Defence.

Over the course of the next strategic plan, we will continue to work with our uniformed services to tackle discrimination wherever we find it.

As an 'A status' National Human Rights Institution, we uphold the highest standards of impartiality. We are increasingly seeing cases where the rights of different protected characteristic groups need to be balanced. In those cases, we act impartially, encouraging respectful public discourse and balanced consideration of the rights of all involved. This was true of our intervention in the case of *Higgs v Farmor's School*, where we advised the court on striking the right balance between freedom of speech and freedom from harassment.

We have also advised Parliament this year on the human rights implications of issues arising in legislative proposals, including on employment rights and assisted dying. Again, our purpose was to ensure that legislators were fully informed of the equality and human rights issues engaged by legislative proposals.

In line with our 2022 to 25 strategic plan aim to improve equality in a changing workplace, our efforts to prevent sexual harassment at work have continued. After the Worker Protection (Amendment of Equality Act 2010) Act 2023 came into force in October 2024, we published technical guidance to help employers understand their new responsibilities, as well as guidance for specific sectors including orchestras. We continued our enforcement action against high profile organisations where they fall short of the standards the law requires. Everyone has the right to feel safe from harassment at work. Our action helps employers make this a reality.

I am grateful for the hard work of the dedicated people who make up the Commission – from our Board and Committee members to our Leadership team and staff – and all those with whom we work. The achievements of the last year of our 2022 to 25 strategic plan, recorded in this document, do them credit, and set us up well for the challenges of the new strategic plan period ahead.

John Kirkpatrick
Chief Executive



Who we are and what we do

We are Britain's national equality body established under the Equality Act 2006 to promote and uphold equality and human rights laws and standards across Britain. We are the regulator for the Equality Act 2006 and the Equality Act 2010. We are Great Britain's 'A' rated National Human Rights Institution (NHRI) with a full human rights mandate in England and Wales. In Scotland, we have a human rights mandate in relation to matters that are reserved to the UK Parliament.

As an equality regulator, we protect and enforce the laws that ensure fairness, dignity and respect. We are independent of the UK, Scottish and Welsh governments.

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

To achieve this, we aim to be agile, independent and authoritative in everything we do. In the delivery of our 2024–25 business plan and looking ahead to delivering our 2025–28 strategic plan, we focus on our principal purpose and duties:

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

Our job is to challenge discrimination and protect people's rights across England, Scotland and Wales. We do this by:

- upholding and explaining the laws that protect people's rights and freedoms
- enforcing the Equality Act 2010 in England, Scotland and Wales
- preventing and challenging discrimination, so that everyone gets a fair chance in life
- protecting people's rights, so that everyone is treated fairly, with dignity and respect

The nine protected characteristics in the Equality Act 2010 are:

- age
- disability
- gender reassignment
- marriage or civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

We adhere to the [Regulators' Code](#), a framework for how regulators should engage with those they regulate, the framework outlines five principles of good regulation. These are:

- proportionality
- accountability
- consistency
- transparency
- targeting



Further information on our approach to regulation and our regulatory objectives is on our [website](#).

Performance report

This performance report summarises what we have achieved in the past year and the context in which we operated in England, Scotland and Wales. It also highlights our work as a national human rights body. The performance report describes our delivery during 2024–25, the final year of our 2022–25 strategic plan, and outlines the development and launch of our 2025–28 strategic plan.

Performance report

Introduction

This annual report considers delivery against our 2024–25 business plan, and also highlights achievements delivered across our 2022–25 strategic plan.

Throughout 2024–25, we have continued to focus on our role as a strong equality regulator. We have:

- enforced the law
- protected all people's rights
- taken action against those who abused the rights of others
- explained the law clearly, so that everyone can follow it

The 2024–25 plan continued with the thematic approach to our work to maximise opportunities for collaboration between programmes. We adopted an agile approach to delivery to manage and mitigate emerging risks across the year, which included the change in government and subsequent reprioritisation of work. The Board and Executive Leadership Team have oversight of risks to our delivery and to the organisation as a whole. Our risk approach in 2024–25 is reported in the accountability report. Further information on how we manage risks is included on page 92.

Performance report

2022–25 strategic plan highlights

This section contains highlights of work carried out across the 2022-25 strategic plan. Further details can be found in our previous [Annual Reports](#).

Menopause guidance

- in February 2024 we published guidance and videos to help employers understand their legal obligations around the menopause
 - this work related to our strategic plan priority area ‘equality in a changing workplace’
 - the guidance was widely covered in the media and appeared on the front pages of two national newspapers
-

Discrimination at Pontins

- in 2022, we opened our investigation into Pontins for suspected race discrimination against Irish Travellers
 - this work contributed to our strategic plan aim ‘fostering good relations and promoting respect between groups’
 - our enforcement team has been able to use the evidence to challenge unacceptable behaviour with other service providers
-

Artificial Intelligence (AI) and Public Sector Equality Duty (PSED) deep dive in Scotland and England

- this project sought to understand how local authorities and public bodies consider equality when commissioning and using AI and formed part of our work under the strategic plan theme ‘addressing the equality and human rights impact of digital services and artificial intelligence’
 - we developed interventions, and shared information and guidance through a webinar on AI and equality impact assessments with over 60 attendees, for which we received positive feedback
-

Adult social care inquiry

- in 2023, we launched an inquiry to understand the experiences of people who challenged decisions made by local authorities about adult social care
- this formed part of our work under our strategic plan aim 'upholding rights and equality in health and social care'
- our inquiry attracted support from across the sector and we have seen positive action from regulators and local government

Preventing hair discrimination guidance

- in 2022, our research indicated that discrimination related to hair or hairstyles was an issue in Britain
- as part of our 'equality for children and young people' strategic plan aim, we developed resources including an animation video, a decision-making tool for schools and written guidance to help schools develop fair policies
- the toolkit received extensive positive media coverage

Race legal support fund

- in November 2021, we established the Legal Support Scheme Fund for Race Discrimination Cases
- the fund was established to help achieve our strategic plan aim of 'ensuring an effective legal framework'
- the fund closed to new applications in January 2024, and in that time received 82 applications and provided funding for 47 cases

Performance report

Looking ahead to 2025–28: Designing our new strategic plan

In 2024, we launched a consultation regarding the development of our 2025–28 strategic plan. We reflected on our work under the 2022–25 plan to develop our approach for the future. We considered what worked well, where we had made impact and how we might build on this through our new approach. The plan was laid in Parliament on 26 March 2025.

Our 2025–28 strategic plan builds on our learning and impact from delivery in 2024–25, and from across the 2022–25 strategic plan period and focuses on our principal purpose and duties:

- promoting and protecting equality, diversity and human rights
- monitoring the effectiveness of legislation
- reviewing our performance as an equality regulator and as a National Human Rights Institute

Our 2025–28 work programme will be organised into 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



The following performance report focuses on our achievements during 2024–25 against each area of 2022–25 strategic plan.

Performance report

Equality in a changing workplace

Our goal is to ensure that workers can work free from discrimination, victimisation and harassment. We work towards the elimination of pay and employment gaps for women, ethnic minority and disabled workers and seek to make all workplaces fair. We use a wide range of regulatory powers to highlight workplace concerns across sectors and support the implementation of important new legislation and policy related to the workplace.

This year we have delivered new guidance, taken action against serious breaches of the Equality Act 2010 and worked with organisations to influence improvements. We have continued our work to ensure compliance with gender pay gap reporting deadlines for the previous year 2023–24 with 100% compliance achieved by October 2024 and only six organisations failing to meet the initial 4 April 2024 deadline.

Influencing and advising

Uniformed services

In November 2024, we convened senior leaders from the police, armed forces and fire and rescue services for the first of a series of exchange network events. The events were developed to create a network and to facilitate connections among senior leaders and equality, diversity and inclusion practitioners from across Britain's armed forces and included guest speakers from the emergency services.

During the events we presented our updated technical guidance and facilitated interactive discussions to improve delegates' understanding of their legal duties to protect their workforce following the introduction of the preventative duty for all employers which came into force on 26 October 2024.

Attendees described the event as 'the best webinar they had attended in a while'. Others noted that they would be 'more than happy to take part in other similar sessions'.

In February 2025, we held a further hybrid session with organisations from across the sector. The exchange events and our other engagement and research in the sector will inform our new guidance, which is currently in development. The guidance is aimed specifically at the uniformed services and focuses on the effective use of data to improve equality.

Apprenticeship standards in Wales

The Welsh Government guidance on Apprenticeships standards in Wales was strengthened following our intervention. We submitted evidence and made recommendations that the Public Sector Equality Duty (PSED) should be embedded in the standards as well as promoting the duty to make reasonable adjustments for disabled people. In its summary of responses, the Welsh Government publicly thanked us for our advice and updated the published guidance to include an Equality and Diversity section which takes the PSED into account.

Guidance and toolkits

Preventing sexual harassment at work

A priority in our 2022–25 strategic plan was to ensure that workers are protected from discrimination and harassment. This included development work on the sexual harassment preventative duty, which came into force on the 26 October 2024. This new duty, introduced by the Worker Protection Act 2023, requires employers to take reasonable steps to protect their workers from sexual harassment. We can enforce this, which means we have an important responsibility to help employers understand and take action to meet their new obligations.

We produced advice about the legislation and subsequently revised our technical guidance on harassment at work. Our updated guide sets out actions employers can take to prevent sexual harassment, with new advice for employers to meet the preventative duty.

We produced additional resources to give employers more options for understanding, engaging with and sharing the guidance. These included:

- the ‘Employer 8-step guide: Preventing sexual harassment at work’ guide, to outline the most effective steps employers can take in the workplace to meet the duty
- a short guide released in December 2024 titled ‘New sexual harassment law and workplace Christmas parties: What employers need to know’, to summarise effective steps employers can take to prevent sexual harassment during work social events
- a video version of the 8-step guide, published in May 2025, to encourage sharing and further compliance with the preventative duty and for reuse in other materials

The technical guidance and supplementary guide have remained in our top 10 most visited website pages since their launch and generated an increase in web traffic of around 600% in the first 3 days of publication.

Our guidance has also been well-received by stakeholders, such as ACAS and the Financial Times, who said that managers' 'first priority is to read and act on EHRC guidance' following the introduction of the duty.


Preventing sexual harassment toolkit for orchestras

In August 2024, together with the Independent Society of Musicians (ISM), we published a toolkit to support orchestra managers and those with human resource (HR) responsibilities to prevent sexual harassment in the music industry.

In their Dignity at Work 2 report into discrimination in the music sector, the ISM identified the hospitality sector toolkit as a resource that could be useful to the music sector. Following our own analysis, we agreed to jointly produce an adapted version of the toolkit for orchestras and music ensembles.

The toolkit outlines the law on sexual harassment and provides clear advice on steps orchestras should take to prevent it. Much of the advice included is relevant to the wider music industry and we encourage managers from across the sector to engage with it. The guidance also includes a checklist to support orchestras through every stage of a session, an action plan to outline what action orchestras need to take and monitoring logs to monitor how these items are being used.

On launch day, our Chief Executive John Kirkpatrick and orchestral trumpet player Rebecca Toal, discussed the guidance on BBC Radio 4's Today Programme. In February 2025, we held two workshops on the toolkit at the Association of British Orchestras' annual conference.



The ISM is proud to have collaborated with the EHRC on this toolkit for orchestras. We believe the toolkit sends an important signal that sexual harassment is unacceptable and has no place in music. It will help orchestras of all shapes and sizes to protect their musicians and handle incidents more effectively, and we hope that many will find it an invaluable resource.

Deborah Annetts, Chief Executive of the ISM



Hybrid Working Guidance

In September 2024 we published our Supporting disabled workers with hybrid working: Guidance for employers. The guidance is aimed at managers and leaders who are supporting disabled workers with participating fully in hybrid working. It provides practical tips, conversation prompts, questions and case study examples, and covers both recruitment and employment.

The guidance was discussed by several specialist trade publications and was viewed over 1,400 times in the first three weeks following publication.

Enforcement and litigation

Section 23: IKEA

We are monitoring IKEA's compliance with an agreement we reached with them following a complaint about sexual harassment and assault received from a former employee. The agreement relates to how IKEA UK handled the allegation of an incident at one of their UK stores.

Under the terms of the agreement, IKEA UK has committed to reviewing the way it deals with sexual harassment and to meeting its responsibilities under the Equality Act 2010. IKEA UK has made commitments to:

- communicate a zero-tolerance approach to sexual harassment to all staff
- work with a specialist external law partner to support the organisation in reviewing its policies and processes relating to sexual harassment, and to improve its responses to complaints
- provide training to HR staff and line managers on the enhanced policies and processes and on the prevention of harassment in general and sexual harassment

[Read more about section 23 agreements.](#)

Section 23: McDonald's

In March 2025, we wrote to every McDonald's franchise in Britain to remind them of their legal obligation to prevent sexual harassment under the new duty and reminding them of the Equality Act 2010 requirement not to discriminate, harass or victimise workers on the basis of any of the nine protected characteristics, and of the consequences of failing to meet them. This followed work we completed in 2023–24 with McDonald's and further reported incidents.

McDonald's Restaurants Limited, the name under which McDonald's trades in Great Britain, signed a legally binding agreement with us in 2023 after concerns were raised by the Bakers, Food and Allied Workers Union about their handling of sexual harassment complaints made by staff in UK restaurants. Individual franchises are not parties to the agreement. However, the agreed action plan requires McDonald's to support the uptake of training and policy materials by franchisees whilst ensuring that franchisees are aware of their obligation to address any issues and their responsibility for complying with the law.


Knight v MOD – Race Legal Support Fund

During 2024–25, we concluded work on open cases under our Race Legal Support Fund. The fund supported people who raised claims of race discrimination against a variety of employers and service providers, including high street retailers, schools, airlines, banks and pubs.

One case we supported was a claim by Kerry-Ann Knight, a former Corporal who fronted British Army recruitment campaigns. She received an apology and a substantial financial settlement from the Ministry of Defence after claiming she was subjected to racist and sexist abuse.

Ms Knight told an employment tribunal that she had been repeatedly racially abused by colleagues and that, despite regularly raising complaints about the abuse she experienced to her superiors, no action was ever taken. Her experiences left her feeling that the Army was 'institutionally racist'.


Ms Knight also faced sexist abuse and sexual harassment, including being shown inappropriate pictures at a work event and being asked to comment on them. Learning from this case has helped to inform our work on discrimination in uniformed services.



Without the EHRC providing me with the financial security of funding my legal case, it wouldn't have been possible for me to take on a powerhouse like the Army and come away with an apology and a substantial payment.

I hope the EHRC keep taking risks and continue to support cases like mine with the limited funding available. I cannot begin to express how empowering the impact of having such support is.

Kerry-Ann Knight



Performance report

Equality for children and young people

Many children and young people in Britain encounter discrimination that limits their potential. Our goal is to protect and uphold the rights of all children and young people, including those in institutional care settings who are regarded as especially at risk of not having their rights upheld. This year we have developed new guidance, continued enforcement work and ensured compliance with the Public Sector Equality Duty (PSED).

Evidencing the issues

Scotland Evidence Academic Engagement

During 2024 and following publication of the 'Equality and Human Rights Monitor: Is Scotland Fairer', we organised seven engagement events with Scottish academic research networks to promote our work, which were attended by over 60 academics. These events provided access to new sources of research and equality data, such as research into the experiences of ethnic minority LGBT+ people accessing services in Scotland, an area where there is a lack of standardised data on these issues.

Influencing and advising

Scottish Funding Council

During 2024–25, we continued to progress our PSED work in partnership with the Scottish Funding Council (SFC) to pilot a new national approach to setting equality outcomes with Scotland's universities and colleges.

This is the first time the PSED has been used to set equality outcomes at a national or sectoral level. The work aims to help Further Education and Higher Education (FEHE) institutions focus their equality outcomes on the most significant inequalities relevant to their remit. This work has led to:

- strong cross-sector uptake of the national equality outcomes
- a national event that we delivered in partnership with SFC in May 2024, attended by senior leaders of Scotland's 44 universities and colleges
- further work with SFC to develop a measurement framework, equality data tool and associated guidance to improve institutions' confidence when measuring their equality outcome progress

- a national event that we delivered in partnership with SFC in May 2024, attended by senior leaders of Scotland's 44 universities and colleges
- further work with SFC to develop a measurement framework, equality data tool and associated guidance to improve institutions' confidence when measuring their equality outcome progress
- development of training for senior leaders in FEHE institutions
- agreement of two thematic reviews for 2025 and 2026 to inform improvements to the National Equality Outcomes and a more precise measurement framework

Guidance and toolkits

Schools Technical Guidance

This year we have further developed our Schools Technical Guidance for Scotland, England and Wales. Each nation has a specific guide applicable to them, and we are taking a consistent approach to the review across the three nations. We intend to produce accurate, up-to-date, authoritative and accessible guidance for those who need to know how equality legislation applies in schools. We have reviewed each piece of guidance and have developed our plan for improvements as we move into the drafting and consultation period in 2025–26.

Enforcement and litigation

University of Bristol v Abrahart

Natasha Abrahart was studying physics at the University of Bristol. She was socially anxious and suffered from depression, anxiety and suicidal thoughts (which her university was aware of). Shortly before she was due to give a presentation before her peers and lecturers, she took her own life.

At first instance, a County Court held that the university had failed to make reasonable adjustments for Natasha and had discriminated against her. The university appealed to the High Court.

We intervened in the appeal, to advise the court on the anticipatory duty to make reasonable adjustments and what amounts to a competence standard. The court ruled that the University of Bristol failed to make reasonable adjustments for Natasha Abrahart. The court also determined that she had been indirectly discriminated against and discriminated against on the grounds of disability.

In July 2024, following the case, we published an advice note for the higher education sector. It explained how education providers must ensure reasonable adjustments are implemented for students who need them, and what systems, processes and standards they should use to help them do this.

In September 2024, we met with the Office of the Independent Adjudicator for Higher Education, the complaints handler of last resort for the higher education sector. They informed us that they had adopted our advice note as part of the guidance that they advise universities to comply with. They have also asked universities what steps they have taken to comply with the advice note.

A number of universities have taken steps to bring their policies and procedures in line with the advice note. Oxford University is working on incorporating inclusivity into its teaching practices with the joint benefits of making the environment more welcoming for disabled student and allowing its disability service to act as consultants on the most complex cases. Bristol University has updated its regulations, is undertaking staff training and continues its programme of wellbeing service improvement. The Open University undertook a mapping exercise to identify the 'crunch points' faced by disabled students in their education journey, and is developing new escalation processes.

Performance report

Upholding rights and equality in health and social care

Our priorities are ensuring that people with learning disabilities, autism and mental health conditions receive the support they need, improving access to social care and reducing barriers for people with protected characteristics to receive healthcare. This year we have supported organisations through advice and guidance and ensuring compliance with the Public Sector Equality Duty (PSED).

Influencing and advising


Integrated Care Boards

Under our health and social care thematic aim, we have worked with the 42 integrated care boards (ICBs) in England to help them understand their obligations under the PSED. ICBs are new bodies that help to coordinate strategic planning and commissioning across local health and care systems. We have also worked closely with NHS England as the system leader and the Care Quality Commission. We have run five seminars focusing on different aspects of the PSED, with an average audience of 100 participants.



Lisa Shoko from Liverpool Women's NHS Foundation Trust praised the seminar she attended in a LinkedIn post. Donna Ockenden, Chair of independent reviews of maternity care in Shropshire and Nottingham, commented:

Thank you for the opportunity to join yesterday's meeting - the EHRC are doing some amazing work, so glad to be able to liaise with them on such a regular basis.



Throughout our engagement, we have encouraged ICBs to consider six priorities from the Equality and Human Rights Monitor 2023. A significant number of ICBs have adopted these as their overarching equality priorities.

Our engagement has shown that action has been taken to address:

- inappropriate detention of people with a learning disability and autistic people
- racial inequalities in maternity services
- digital exclusion in health and social care services

We continued our monitoring of PSED specific duty compliance across the 42 ICBs in Autumn 2024, and we continued to work with those that remained non-compliant. Rates of compliance improved from 2023 to 2024 and are continuing to improve in 2024–25, with now just one ICB that is not compliant. We will continue working with them in 2025–26.

PSED compliance

In 2025, we sent an advice note to General Practitioners (GPs) in England and Wales to help them comply with the PSED and consider equality when delivering their services. The note follows feedback from our healthcare stakeholders that GPs were not always aware of their PSED responsibilities and was prompted by concerns raised about the potential digital exclusion for some groups when moving services online.

The note explains how the PSED relates to GPs and includes practical steps on how to meet the three aims of the general duty. We distributed the note to relevant stakeholders and promoted the work through our channels.

Policy briefings: use of data to tackle inequalities in maternity care

In July 2024, we released a briefing to health body policy makers regarding the use of equality data to tackle race inequalities in maternity care. The briefing aims to improve the experience of everyone who uses services, particularly women and babies from ethnic minorities.

The briefing explains why referring to equality data is important and beneficial when developing policy and includes advice on how to collect, analyse and use data effectively.

The briefing was shared with stakeholders and published on our website. It received positive feedback from organisation across the healthcare sector, including from NHS England, the Parliamentary and Health Service Ombudsman, NHS Greater Manchester Integrated Care and NHS Resolution.

Guidance and toolkits

Strengthened social care commissioning

We provided advice to the Welsh Government on the development of the new national framework for commissioning care and support code of practice. The code of practice was strengthened following advice we provided in the development of the draft code, and our response to their consultation.

We welcomed the inclusion of a new standard within the code for care and support commissioners to proactively address inequalities and promote the fulfilment of human rights amongst other commitments on which we advised including on fair work.

The published code now requires commissioning practices to be standardised by tackling inequalities, fulfilling human rights obligations and supporting fair work practices. This requires social care commissioners to be aware of, and comply with, UN treaties, the PSED and the socio-economic duty. Commissioners will be required to measure value by analysing complaints data, including by protected characteristics (which follows recommendations made in our inquiry into challenging adult social care decisions) and embed equality into their procurement exercises.

Wales health and social care guidance for stakeholders

To further support the implementation of the equality and human rights standard, in July 2025, we published a toolkit to support social care commissioners to:

- understand their obligations under the PSED
- provide examples of how the PSED can be used to address inequalities and provide services that meet the diverse needs of people using social care
- practical tips on when to apply the PSED during the Commissioning Cycle

The toolkit has been well received by social care commissioners including a supportive statement being issued by the Chief Social Care Officer for Wales.

Performance report

Addressing the equality and human rights impact of digital services and artificial intelligence (AI)

AI poses many challenges to equality and human rights. We are developing our expertise as a regulator of this new and complex technology. Our focus is to ensure the use of AI does not have a negative impact on anyone's rights. In 2024–25 we have been involved in research, influencing and advising as well as developing new guidance and toolkits.

Police use of Facial Recognition Technology

Over the past year we have engaged with other statutory bodies to ensure that the police's use of live Facial Recognition Technology (FRT) in England and Wales does not compromise equality or human rights. These include the National Police Chiefs Council (NPCC), Independent Office of Police Complaints (IOPC), Information Commissioner's Office (ICO), His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) and the College of Policing.

In October 2024 we responded to the College of Policing's consultation on their draft Authorised Professional Practice (APP) for Data Driven Technologies highlighting how the draft APP could be strengthened to ensure full compliance with the Equality Act 2010 and Human Rights Act.

In November 2024, we responded to HMICFRS' consultation on their proposed policing inspection framework and programme for 2025–2029. We recommended that an urgent science and technology thematic inspection was undertaken focusing on police use of all types of FRT (live, retrospective and operator initiated). In the absence of appropriate safeguards, deployment of such technologies may give rise to serious risk of compromising equality and human rights protections.

The policing inspection programme and framework (published in March 2025) subsequently included a planned thematic inspection on 'science and technology, which examined the use of new and / or emerging science and technology, such as biometrics and facial recognition, to tackle crime'. We have continued to call on the UK government to introduce a comprehensive legal framework to govern the use of FRT in policing and we have engaged in discussions with the new Policing Minister alongside other key regulators.

In Scotland, we have been engaging with Police Scotland, the Scottish Police Authority and the Scottish Biometrics Commissioner on their exploration of the potential use of live FRT. We are working collaboratively with the Scottish Human Rights Commission and the Children and Young People's Commissioner Scotland to inform Police Scotland's consideration of live FRT and ensure that it takes full account of equality and human rights obligations and our learning from engagement on live FRT in England and Wales.

Influencing and advising

Fairness Innovation Challenge

We have been a partner in the Fairness Innovation Challenge (FIC) throughout 2024–25. FIC is a Department for Science, Innovation and Technology grant-funded project to drive the development of approaches to address bias and discrimination in AI systems, designing them with fairness in mind from the outset. These approaches consider the broader regulatory, historical, social and cultural context in which an AI system is embedded. It might include participatory forms of data collection, intersectional bias analysis and investigations into bias in human decision-making processes.

With the UK government's AI Opportunities Action plan, which aims to increase the adoption of AI across the nation, it is critical that AI systems are built and used fairly and do not discriminate. We have been a regulator partner in the challenge to help guide the winning teams through legal and regulatory issues relating to fairness. We also advise on how strategies to address bias and discrimination in AI systems comply with the Equality Act 2010 and Human Rights Act 1998.

The FIC has been a productive and effective way of working for the EHRC. We have been able to support innovators to understand and comply with our regulatory remit. The different use cases (covering health, finance, higher education and recruitment) have given us greater insight into the different ways bias can appear in AI systems, which, if left unchecked, can lead to discrimination. This will inform our future delivery activity in relation to AI.

Guidance and toolkits

Public Sector Equality Duty (PSED) guidance for AI and technology use

In September 2024, we published a 10-step guide to help the public sector in England embed equality considerations in their policies, including decisions to commission and / or use AI technologies. We received excellent feedback on the guide. Organisations across the public sector said they found the guide to be clear and practical and provided examples of use. Public authorities, including the Care Quality Commission (CQC), are using the guide to review their own approach to considering the equality impact of their policies.

In response to a recommendation in our challenging adult social care decisions in England and Wales inquiry report, we have been working with Partners in Care and Health (PCH) – a coalition of the Local Government Association and the Association of Directors of Adult Social Services – to improve the accessibility of information and advice. As a result, our Equality Impact Assessment 10-step guide is also embedded in a new self-assessment framework, developed by PCH, to help councils to review their adult social care information and advice.

Public sector and data protection guidance

We also updated our PSED and data protection guidance. This work was completed in collaboration with the Information Commissioner's Office (ICO). It includes a case study developed in cooperation with the Netherlands Institute for Human Rights illustrating the importance of considering the equality impact in AI.

The guidance published includes:

- revised PSED and data protection guidance, including new examples of data that can be used as a proxy for protected characteristic data and advice on how public bodies processing such data can comply with the PSED and data protection law, including in the context of AI
- case studies that demonstrate how local authorities can consider equality when commissioning and using AI technologies
- a step-by-step guide that provides practical advice for public authorities in England, so they are clear on how to assess the equality impact of their policies to meet legal requirements and to demonstrate best practice

The step-by-step guide complements our existing guidance that helps public bodies in Scotland and Wales meet their legal requirements, in line with the different specific duties for England, Scotland and Wales. The work is already influencing public authorities' behaviour in a positive way. His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) found our guide to be 'one of the clearest they'd seen' and is planning on using it to develop its corporate equality impact assessment guidance.

Scotland – AI Guidance

In March 2025, we developed a short guide with six discussion points to help public bodies in Scotland consider the equality impact of AI-based technologies, particularly when working with suppliers. The guide will help public bodies think about equality impacts throughout their consideration and use of specific AI-based technologies and therefore support them to comply with the public sector equality duty and specific duties in Scotland. The guide was added to the Scottish AI Playbook, which seeks to support organisations to implement AI in a trustworthy, ethical and inclusive way.

AI Procurement Guidance

During 2022–23, we conducted a deep-dive project into how councils in England and public bodies more broadly in Scotland were considering equality issues when commissioning and using AI. We found a need for us to produce practical guidance to help public authorities better consider equality when procuring and contracting AI technologies and services. We designed approaches and responded to these findings during 2023–24 and delivered further activity in 2024–25.

In England, we responded by securing agreement to work cooperatively to produce such guidance with strategic stakeholders. The stakeholders included:

- the Local Government Association (LGA)
- the Information Commissioner’s Office (ICO)
- the Department for Science, Innovation and Technology
- the Crown Commercial Services
- the London Office of Technology and Innovation
- several other organisations representing local authorities in England

To maximise impact, we jointly agreed to broaden the scope of the guidance to include data protection requirements in addition to those of the PSED, and that the LGA was best placed to own the guidance. The guidance was launched by the LGA on 16 April and was widely promoted through stakeholders’ channels including ours.

Performance report

Fostering good relations between groups

Fostering good relations between groups with protected characteristics is an obligation under the 2006 Equality Act. We play a leading role in facilitating public debates about equality and human rights issues, including where the balance of rights across different groups must be considered. This year we have continued our work in sport and used our powers to undertake litigation.

Influencing and advising

England and Wales Cricket Board and Yorkshire County Cricket Club

In 2024, we continued our work with both the England and Wales Cricket Board (ECB) and Yorkshire County Cricket Club to monitor their actions to address concerns of racism and other forms of discrimination in cricket. We concluded our monitoring in 2025. Our more recent engagement has seen the ECB adopt the principles of Public Sector Equality Duty (PSED) within cricket. They now use Equality Impact Assessments in their business planning processes.

Enforcement and litigation

Legal agreement with the Welsh Rugby Union

In November 2024, we issued a Section 23 legal agreement to the Welsh Rugby Union (WRU) following concerns over a workplace culture which did not adequately protect staff from discrimination and harassment. The legally binding agreement sets out what the WRU must do over the next year to improve its workplace policies, practices and culture to protect its employees from discrimination and harassment, including sexual harassment.

Higgs v Farmor's School

We intervened in the case of Higgs v Farmor's School in the Court of Appeal concerning the legal test to apply to deciding claims for discrimination because of protected religious or philosophical beliefs.

Kristie Higgs was dismissed from her employment as a pastoral assistant at Farmor's school following complaints about her expressions of her beliefs posted on social media about how LGBT relationships and sex education were taught in schools. She claimed direct discrimination because of her protected manifestations of religious beliefs.

Mrs. Higgs won her appeal in a judgment given on 12 February 2025. Our guidance was recognised as helpful, and the court of appeal endorsed our submission.

Section 23 agreement with Live Nation

We continue to monitor a Section 23 agreement that we concluded with Live Nation, who run Wireless, Download, Latitude, Wilderness, Reading and Leeds Festivals.

Under the legal agreement Live Nation (Music) UK Limited has committed to:

- undertake a robust lesson learning exercise to investigate the cause of accessibility issues at Wireless 2022 and Download 2023 and ensure they are not repeated
- introduce a new accessibility manual to assess and promote accessibility on all existing and new festival sites and consolidate all accessibility-related policies and processes
- review all internal policies and procedures to ensure accessibility provisions are included
- introduce organisation-wide training on disability awareness and accessibility which will be tailored to different roles, including those in customer facing roles
- working with 'mystery shoppers' to ensure that staff are responding properly to accessibility needs at festivals

Performance report

Ensuring an effective legal framework to protect equality and human rights

The protection of equality and human rights depends on effective legislation. We use our powers, evidence and influence to strengthen the framework that protects equality and human rights in Britain. This year we have consulted on our redrafted Services Code of Practice, provided advice and influenced policy development. We started a major investigation into the Department for Work and Pensions who may have broken equality law by failing to anticipate and make reasonable adjustments during health assessment determinations. We also intervened in a case that was seeking to clarify the definition of sex in the Equality Act 2010.

Evidencing the issues

Improved equality data

In September, Data Cymru launched a new 'Understanding equalities' data dashboard. When publishing the dashboard, Data Cymru stated that it had been inspired by our Equality and Human Rights Monitor: Is Wales Fairer? 2023 report. The dashboard references the PSED and states that its purpose is to support councils understand equality and meet its duties. Data Cymru is a Welsh local government company that supports local government in Wales to use and understand data.

Influencing and advising

Public Sector Equality Duty (PSED) webinars

In December 2024, we delivered six webinars with public bodies on the PSED in Scotland. More than 130 people attended, covering the NHS, Integration Joint Boards, the further and higher education sector, councils, non-departmental public bodies and scrutiny bodies.

The webinars offered a dedicated space for public bodies to consider how they can advance equality in their unique contexts, identify ways to measure the impact of their work and share useful practices.

As well as offering guidance on reporting and data collection, colleagues fielded questions about any challenges public bodies were facing. The webinars were sector-specific and encouraged public bodies to focus their PSED work on tackling the most significant inequalities in their sector.

Attendees provided positive feedback that the webinars were informative, useful and increased their understanding of PSED reporting requirements.

Scotland Policy influencing

We advised the Scottish Parliament on the Police (Ethics, Conduct and Scrutiny) Bill, which was passed on 15 January 2025. Following our advice, the Cabinet Secretary amended the bill to list EHRC as a statutory consultee the Chief Constable of Scotland must consult in respect of the new Code of Ethics for Policing in Scotland.

We worked with the Mental Welfare Commission for Scotland's in the publication of their 'Hospital is not home' report, which looked at the circumstances of 55 people with learning disabilities and complex care needs who had been detained in hospital for long periods of time. The publication was widely reported in Scottish media quoting our concern at the findings.

We advised the Scottish Government on the development of LGBT Inclusive Education Guidance, which was published on 19 December 2024. As a result, the guidance has a strong focus on equality and references the Equality Act 2010 requirements in relation to a national approach on recording incidents of homophobic and transphobic bullying.

Senedd Reform Bill withdrawn

The Welsh Government withdrew the Senedd Cymru (Electoral Candidate Lists) Bill in September 2024 following our letter to the Senedd Reform Bill Committee in April 2024 which highlighted our concern that provisions within the bill to allow candidates to self-identify their gender could be inconsistent with the Equality Act 2010. Subsequently the Welsh Government published draft guidance to political parties on diversity and inclusion, which has reflected our guidance and advice on legal positions and data collection.

PSED Monitoring of Local Authorities

We completed a monitoring review of 97 local authorities, which is equivalent to one in four of all authorities in the sector. We found that overall levels of compliance appeared to have regressed significantly since we last reviewed in 2012. We found that around 16% of local authorities were publishing clear evidence to show that equality was mainstreamed across their work. They were publishing comprehensive equality information and meeting their PSED specific duty obligations.

We defined these to be 'doing well'. The majority were doing just about enough to meet their PSED specific duty obligations. This included some up-to-date equality information on their service users and workforce and one or more equality objectives. However, of the 25% that were 'below' or 'well below' expectations, this was because they had very little or no equality information on their workforce and / or service users and no equality objectives, or they had this information but it was many years out of date.

In response to this challenge, we prioritised following up with the 25 local authorities in the least compliant categories, while also taking steps to disseminate key messages to all local authorities. We began following up with the poorest performers, offering focused feedback on what needed to improve and seeking assurances and timescales for this to happen. Gradually we saw the numbers of non-compliant authorities reduce to zero.

Guidance and toolkits

Updating the Code of Practice for services, public functions and associations

From 2 October 2024 to 3 January 2025, we ran a public consultation on updates to our Code of Practice for services, public functions and associations. We are updating the code to ensure it is an accurate and authoritative statement of the law. We received over 550 responses from individuals and organisations and analysed our findings to inform further changes to the code.

Preparation for the consultation was significant and involved finalising a draft version of the Code, developing supporting materials and engaging stakeholders before and throughout the consultation period. Work will continue into 2025–26, when we will be updating the Code in the light of the Supreme Court decision in *For Women Scotland v The Scottish Ministers*, consulting on those changes and submitting the Code to the UK government for laying before Parliament.

Enforcement and litigation

Section 20 investigation and section 31 assessment – DWP

We are investigating whether the Secretary of State for Work and Pensions, or his employees or agents, have broken equality law. We suspect that they may have failed to anticipate and make reasonable adjustments for disabled people with a mental impairment during health assessment determinations for the following assessments and benefits:

- Work Capability Assessments for:
 - Employment and Support Allowance (ESA)
 - Universal Credit (UC)

- Assessments for:
 - Personal Independence Payment (PIP)

We are also assessing the Secretary of State for Work and Pensions' compliance with the Public Sector Equality Duty (PSED) when developing, implementing and monitoring policy guidance relevant to health assessment determinations.

In 2024, we ran a survey to gather evidence to support the investigation and assessment, alongside evidence gathered from the DWP, who have engaged with us throughout the process. The investigation and assessment are into the final stages of evidence gathering ahead of publishing the report in due course.

Read more about [section 20 investigations](#) and [section 31 assessments](#).

Home Office PSED compliance

The Home Office has made significant improvements to its PSED compliance after implementing an action plan as part of a legally binding section 23 agreement with us in April 2024.

The improvements include:

- the rollout of training on the Public Sector Equality Duty for all staff to ensure they are aware of their legal obligations under the Equality Act 2010
- improving the quality of advice to ministers, to ensure due regard to the equalities impacts of policy decisions
- regular identification and recording of equality and PSED compliance risks
- clear ownership of PSED compliance at a senior level

The action plan was implemented over three years, and we continued to monitor for a further six months to allow for all actions to be fully completed and embedded into the department's systems and processes.

The agreement was made after we concluded that the Home Office had not complied with its PSED in its hostile environment policy agenda, particularly in relation to members of the Windrush generation and their descendants. These measures, if sustained, will help the department to fulfil its legal obligations and contribute to avoiding future injustices like the Windrush scandal.

Sheku Bayoh Inquiry

We have provided support and briefings specifically in relation to the public sector equality duty to the Sheku Bayoh inquiry, a major public inquiry set up after the death of Sheku Bayoh on 3 May 2015 after an incident in the street in Kirkcaldy involving Police Scotland officers.

The purpose of the Inquiry is to examine:

- the immediate circumstances leading to the death of Mr. Bayoh
- how the police dealt with the aftermath
- the subsequent investigation into the death
- whether race was a factor

Clarifying the law

For Women Scotland v The Scottish Ministers

We intervened in this appeal to the Supreme Court following a judgment of the Inner House of the Court of Session in Scotland.

The central issue of the case concerned the meaning of 'sex', 'man' and 'woman' in the Equality Act 2010. These are issues which are central to our remit as the regulator of the Equality Act and bear on the rights of people with the protected characteristics of sex, sexual orientation and gender reassignment.

We intervened to assist the court. We explained that the effect of obtaining a Gender Recognition Certificate (GRC) is to change a person's legal sex, but that the current position creates significant complexity and difficulty in applying the law which should be resolved by Parliament.

Judgment was issued on 16 April 2025, confirming that the terms 'man', 'woman' and 'sex' in the Equality Act 2010 refer to biological sex and addressed several of the difficulties we highlighted in our submission to the Court.

We have reviewed the judgment in detail and we are working on its implications for our work including identifying any guidance that might need to be updated or developed. This work will continue into 2025–26 and is highlighted in our corporate business plan for the year. Our focus remains on ensuring that the Equality Act 2010 is correctly interpreted, applied and works effectively to protect all groups with protected characteristics.

Performance report

Human Rights Monitoring

As the National Human Rights Institution (NHRI) for England, Wales and matters reserved to the UK Parliament we have a responsibility to promote the effective implementation of the human rights treaties the UK has ratified. Our human rights monitoring work includes providing advice to the UK and Welsh governments and to stakeholders to ensure that human rights are promoted, protected and fulfilled. We engage with international human rights reviews, including submitting independent reports on implementation of treaty obligations in the UK.



NHRIs are independent of government with a broad mandate to protect and promote human rights domestically. NHRIs have different legal and constitutional powers, but they must all be independently accredited as compliant with the [Paris Principles](#).

Engagement with civil society

In 2024–25, we provided support to underrepresented civil society organisations to enable them to attend UN treaty monitoring sessions to participate in examinations of the UK's compliance with treaties.

In 2024–25, organisations received support to attend reviews on:

- the Committee on the Elimination of All Forms of Racial Discrimination (CERD)
- the International Covenant on Economic, Social and Cultural Rights (ICESCR)

Engagement with international human rights reviews

- in July 2024 we submitted our report to inform the United Nations (UN) Committee on the Elimination of Racial Discrimination (CERD) list of themes and participated in the oral evidence session in August 2024
- in January 2025 we published over 200 assessments of progress against UN recommendations made to the UK

- we submitted our report on economic, social and cultural rights in January 2025 and participated in the UN Committee's examination of the UK in February 2025

Updating our Human Rights tracker methodology

Our [Human Rights tracker](#) is a searchable online tool for England and Wales where anyone can learn more about the human rights standards the UK has signed up to. In 2024–25, we completed work to update our approach to assessing implementation. On 29 January 2025 we released over 140 assessments of central government actions and over 60 assessments of Welsh Government actions on devolved matters of whether human rights recommendations made by the UN had been addressed. The assessments span a range of human rights issues, from education to voting rights.

Notable assessments in the tracker were:

- the introduction of a significant piece of legislation – the UK Online Safety Act 2023 which aims to help prevent online bullying as well as the Welsh Government action plan to prevent peer-on-peer sexual harassment in education settings
- some action towards updating the Mental Health Act in line with the UN recommendation
- the lack of action from both central and Welsh governments to prohibit the use of restraint in educational settings
- the lack of action from both central and Welsh governments to introduce a legal duty on local authorities to provide funds for parents of deaf children wishing to learn sign language

Performance report

Building our Commission

Alongside our externally facing priorities, we have continued internal work to strengthen and improve our organisation. In 2024–25, this has included providing the tools our staff need to do their jobs, development of our leadership and management, improving our workplaces and ensuring the information we hold is managed well.

Technology improvements

In 2024–25, we have worked to ensure our staff have the best tools available to do their jobs. This includes strengthening our information architecture through the rollout of OneDrive and the use of SharePoint. Our ICT team has supported staff with guidance and training and this work will be completed in 2025–26. We have also continued to test and strengthen our cybersecurity capabilities, including training and upskilling for our staff in how to identify and respond to cybersecurity issues such as phishing attempts.

Workplace transformation

During 2024–25, we continued to make improvements to our offices to ensure that meeting rooms and video conferencing spaces enable cross-organisational working. We continue to operate from four primary offices in Manchester, London, Cardiff and Glasgow. This year we have identified and moved to new offices in Glasgow and London and have reduced our footprint, and consequently our costs, due to leases ending. We supported our staff during these moves and worked to reduce disruption. We moved assets no longer required in our London offices to our Manchester office, including height-adjustable desks and semi-private meeting booths for improved collaboration. We are evaluating remaining assets from the London office for potential use, aligning with our sustainability principles.

Leadership and Management Development

During 2024–25, we invested to further develop the leadership skills of our existing senior managers and to create opportunities for our aspiring managers. Our Senior Principal Development Series integrates on-the-job learning, social learning and formal training. The series is designed to support both personal and professional growth, boost confidence and capability and develop the next generation of leaders within the commission. Our Aspiring Managers course offers participants a chance to enhance their understanding of people management, solidify their learning through discussions and collaboration, expand their professional networks and gain practical knowledge and skills to support their readiness for future managerial roles.

Looking ahead: strengthening our organisation to support our 2025 to 2028 strategic plan

Over the last strategic plan period, we improved our estates and ICT strategies. We developed our staff's skills, knowledge and experience and improved our governance, decision making and accountability structures.

We want to continue to increase our productivity and use public money in the most economic, effective and efficient way. We know 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.

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 develop our people's skills so that they can recognise and grasp opportunities when they emerge and work across the range of our activities. We will also explore how we might use Artificial Intelligence responsibly to improve our own efficiency and effectiveness. We will build on our gathering and use of data to improve our understanding of equality and human rights issues.

Performance report

Equality Objectives

In line with our own Public Sector Equality Duty (PSED) obligations, we have three equality objectives which guide our work:

Equality objective 1: We will promote equality and tackle discrimination by achieving the priorities set out in our strategic plan.

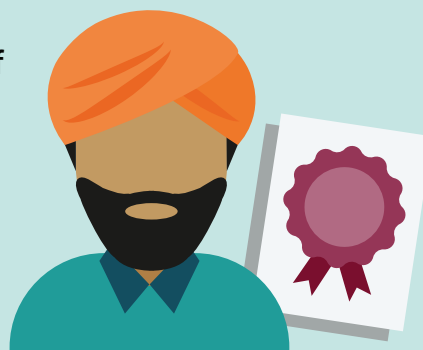
Over the course of 2022–25, we have worked to deliver the priorities described in our strategic plan. Each annual report has showcased some of our most impactful work. This work contributes to our aim to create a society that is fair and where people live well together.

Our 2024–25 business plan included our priority areas of focus as well as our work to develop a new strategic plan. The performance section of this report identifies what we have achieved in the final year of delivery against our strategic plan and outlines how we have approached developing our 2025–28 strategic plan.



Equality objective 2: We will seek to address under-representation of people with different protected characteristics in EHRC, including at senior levels.

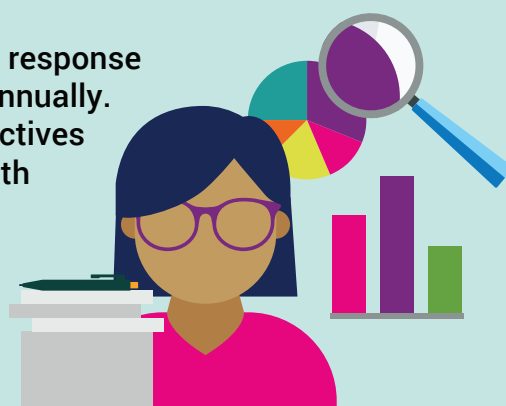
Our recruitment processes are designed to ensure that all candidates are appointed on merit. The analysis on page 54 of this report indicates that we continue to have a diverse staff workforce. Our systems are designed to ensure that recruitment processes are open and fair to all. The make-up of our Board and statutory committees has changed over the course of 2024–25 but maintains a diverse membership.



Equality objective 3: We will make sure our evidence is robust, impartial and enables understanding of the different needs and experiences of protected characteristic groups.

This equality objective focuses on the evidence we use to achieve our strategic priorities and on how we encourage others to make evidence-based decisions that protect and promote equality. In 2024–25, we continued to use the intelligence generated by our Regulatory Hub to improve the way we use evidence to make decisions about where to deploy our regulatory levers. We also continued work to design and develop our data dashboard, which consolidates the evidence gathered through our Equality and Human Rights Monitor.

Our current equality objectives were developed in response to the 2022–25 strategic plan and are reviewed annually. We will formally review them and update our objectives where necessary for by December 2025, in line with our new strategic plan.



Performance report

Our Business

As Great Britain’s equality regulator, we regularly engage with stakeholders and governments across England, Scotland and Wales. Our head office is in Manchester, and we have offices in London, Cardiff and Glasgow. Our workforce is located across all offices, a small number are home based and is organised into two functional areas led by the Executive Leadership team, our regulatory network and our corporate and enabling function.

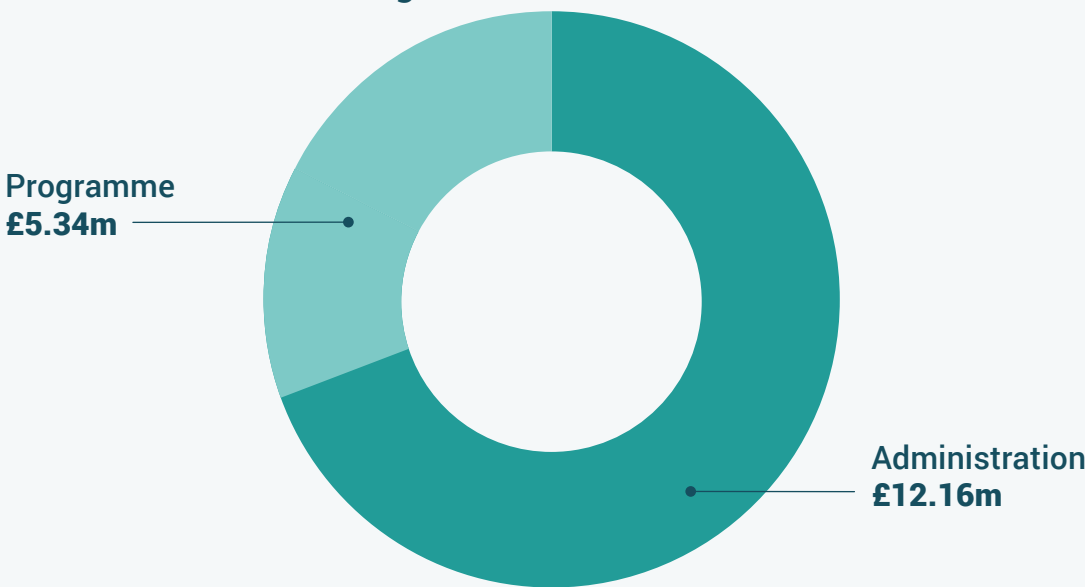
Financial Performance

The delegation letter for 2024–25 confirmed our resource budget at £17.50 million, excluding depreciation*. This is an increase of £0.40 million (2.3%) from 2023–24 but reduced in real terms.

Year	Resource Budget (£m)	Increase (£m)	Increase (%)
2024–25	17.50	0.4	2.3%
2023–24	17.10		

The initial budget allocation of £17.50 million was divided into £12.16 million for administration and £5.34 million for programme funding.

2024–25 Initial RDEL Budget Allocation

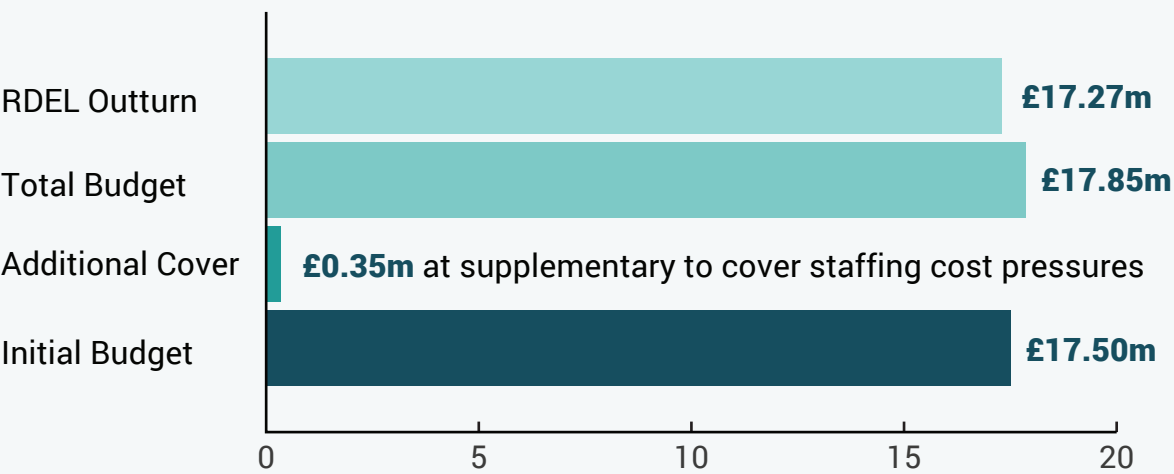


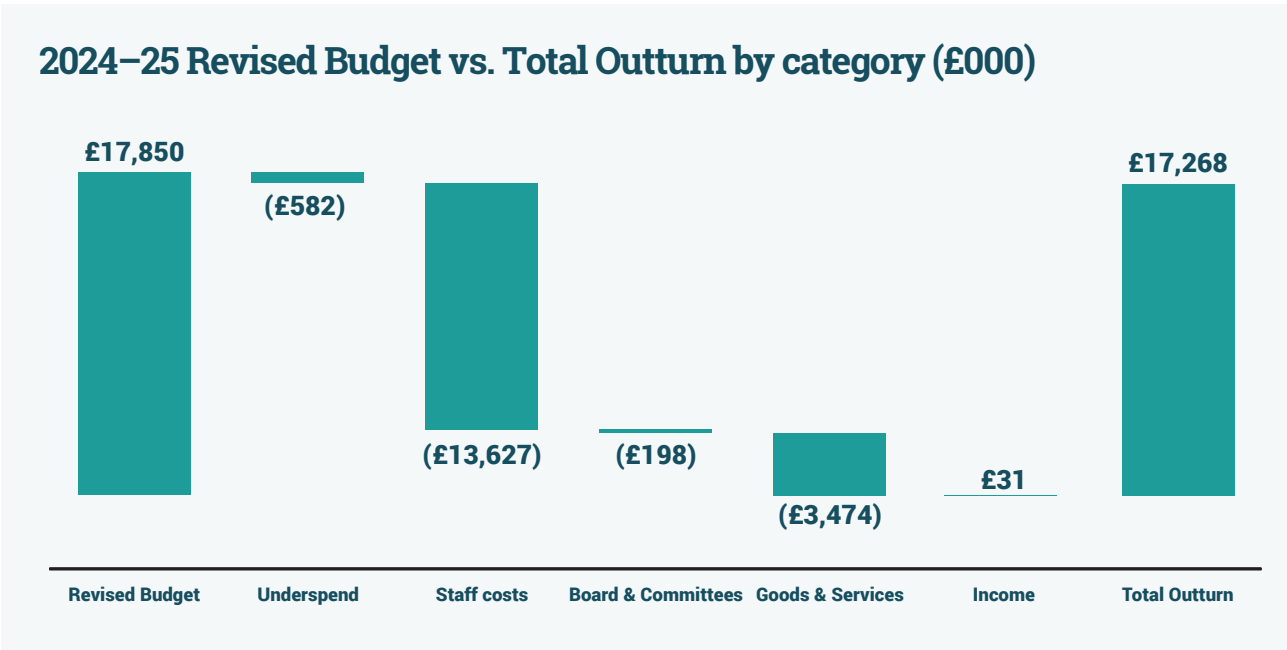
*The EHRC does not receive a depreciation budget as part of the delegation and this is managed at Department level, these charges are therefore excluded from the financial performance analysis.

An additional £0.35 million RDEL budget was allocated in October 2024 to cover staff cost pressures (which we had forecast at the beginning of the year at £1 million), resulting in a total budget of £17.85 million.

As of 31 March 2025, our total net operational resource expenditure (RDEL) amounted to £17.27 million, reflecting an underspend of £0.60 million (3.3%) compared to the revised budget.

2024–25 Delegated Budget and RDEL Outturn



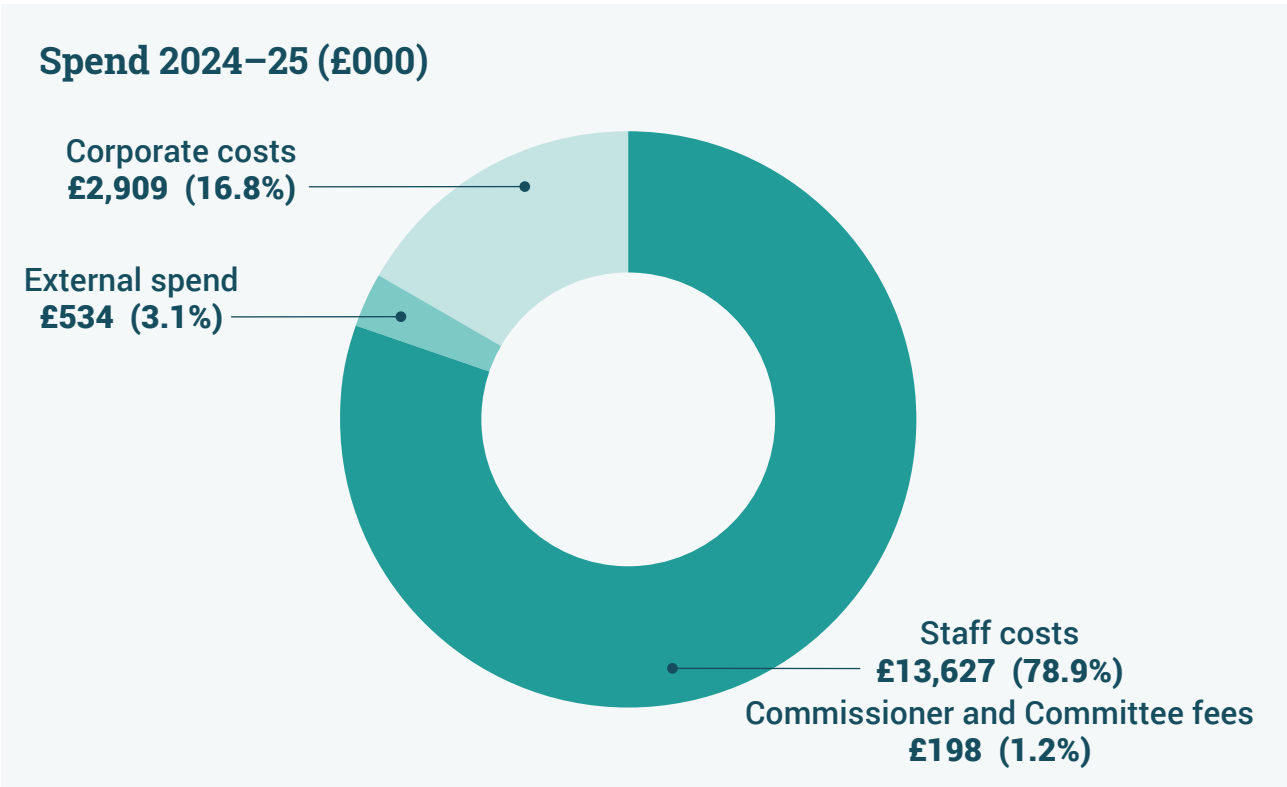


The main reasons for the underspend are as follows:

- **Staff costs.** At the start of the financial year, we anticipated budget pressures. By managing vacancies effectively, we reduced costs by filling fewer positions. Additionally, holiday pay accrual decreased due to proactive staff management and encouraging leave usage within the year.
- **Operating costs.** In 2024–25, we moved our offices in Glasgow and London. The London relocation has led to lower premises costs than expected. We have also seen reductions in administrative costs like travel and recruitment due to longer vacancy periods or unfilled positions.
- **Delivery.** We expected higher external spending in 2024–25, but the 2024 general election and government changes caused delays. Work was postponed to 2025–26, and more of our planned work was completed by internal staff than planned.

Expenditure summary 2024–25

Our total spend was £17.27 million. Staff costs (excluding Commissioner and Committee fees) make up 78.9% of our spending. Support services staff cost £5.3 million (39%), while Regulation (including strategy, policy and delivery) staff cost £8.3 million (61%).



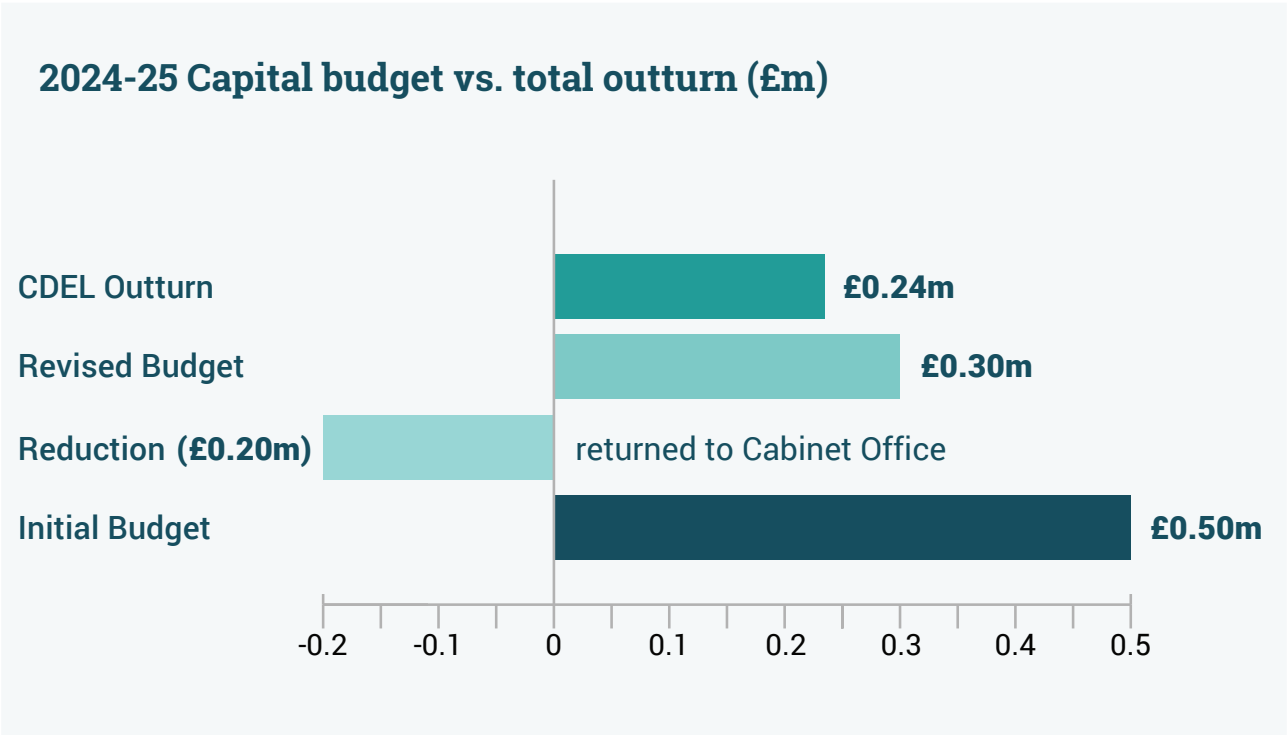
Corporate costs include expenses for IT systems, premises, people services and financial services. External expenditure includes legal counsel, translation services, system updates, website enhancements and publication design.

In 2024–25, we moved our London and Glasgow offices to cost-effective locations that better suit our staff. We improved infrastructure for remote and hybrid work, launched learning programmes, hosted an all-staff conference, and upgraded our intranet and external website for better security and user experience.

Our finance and planning teams worked with budget holders to monitor activities and expenditure. Regular meetings allowed us to address change requests and adjust budgets for maximum impact.

Our budget facilitated both planned and responsive activities as detailed in the Performance Report.

Capital project funding was allocated at £0.50 million. At mid-year we reduced our budget by £0.20 million. Our total investment in year was £0.24 million which was spent on PP&E and software upgrades.



Capital investment improved office accessibility. We installed automatic doors in Glasgow, improved the collaboration spaces in Manchester and enhanced video conferencing facilities across all offices.

The table below compares our RDEL expenditure for the financial years 2024–25 and 2023–24.

	2024–25	2023–24	Change
	£000	£000	£000
Staff, Board and Committee Costs	13,825	14,688	(863)
Corporate Costs	2,909	2,575	334
External Spend	534	544	(10)
Total	17,268	17,807	(539)

In 2024–25, we spent a total of £17.268 million excluding capital and depreciation compared to £17.807 million in 2023–24.

During the 2024–25 period, thorough examination of resource requests resulted in cost reductions compared to 2023–24. This strategic approach aims to decrease personnel expenses, thereby alleviating pressure on our annual budget.

External delivery costs for 2024–25 were consistent with 2023–24. Much of this expenditure went to litigation support, including updating the Services Code of Practice and concluding cases related to the Race Legal Support Fund.

Further information is provided in the statement of accounts and notes to the accounts for the year 31 March 2025, which are set out from page 138 onwards.

Capital structure

Our capital structure is shown as taxpayers' equity in our financial statements. Expenditure is funded by grant-in-aid received from the Cabinet Office as our sponsoring department. We monitor our cash flow and our financial forecast to ensure we have sufficient cash to meet our net liabilities and to pay our creditors promptly. We ended the financial year with a cash balance of £179,000 (2023–24: £244,000). The statement of financial position and changes in taxpayers' equity in the statement of accounts provides more information.

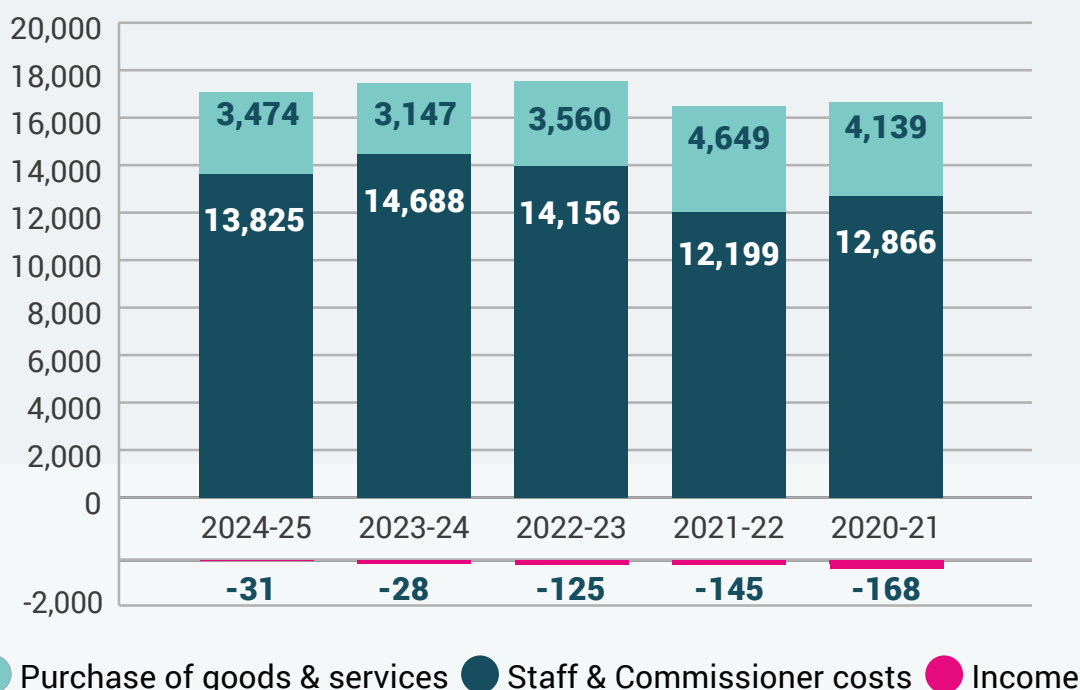
Long-term expenditure trends and value for money

Since 2012, when a financial review of the EHRC concluded that we required a budget of £17.1 million to carry out our basic statutory functions, our budget has remained largely static in cash terms, using the Bank of England calculator to take inflation into account, our budget would now be £24.2 million. As such, our 2024–25 delegation of £17.5 million represented a real-terms reduction of £6.7 million.

Continued real-term pressure on our budget means that we are making difficult prioritisation decisions about what and how we choose to deliver, we have sought to deliver in-house where we can, using our resource flexibly and efficiently to maximise value for money. We have received notification of the 2025–26 RDEL budget (£17.157 million) which represents a shortfall against the 2024–25 outturn, we will face additional pressure in 2025–26 represented by the National Insurance increase, the pay remit and general inflation. We have commenced planning work to transform our organisation to ensure that our structures are affordable, and we can deliver the work planned under our 2025–28 strategic plan with a reducing budget. Our planned transformation activity will ensure that we can deliver the best outcomes for the public within our anticipated baseline budget.

The graph below shows expenditure trends across the previous five years. Expenditure is based on RDEL and excludes depreciation and amortisation and movement in provisions; the table below provides a reconciliation to the financial statements.

Long-term expenditure trends (£000)



	2024–25	2023–24	2022–23	2021–22	2020–21
	£000	£000	£000	£000	£000
Staff and Commissioner Costs	13,825	14,688	14,156	12,199	12,866
Purchase of goods & services	3,474	3,147	3,560	4,649	4,139
Income	(31)	(28)	(125)	(145)	(168)
Total	17,268	17,807	17,591	16,703	16,837
The items below which form part of the reported Net operating expenditure have been excluded from the above long term expenditure trend graph					
Depreciation	699	916	912	601	512
Pension payments - provision movement	-113	-115	-105	-141	-99
Provisions	-23	103	-169	204	17
Net operating expenditure per SoCNE	17,831	18,711	18,229	17,367	17,267

Payment of suppliers

We follow the government's prompt payment guidance to ensure that suppliers are paid quickly. 90.8% of all invoices received were settled within five working days (compared with 88% in 2023–24) and 99.6% of undisputed invoices were paid within the target of 30 days (compared with 99.7% in 2023–24).

Our People

During 2024–25, employee turnover remained broadly consistent with the previous year. Our rolling employee turnover was 13.1%, a decrease from 13.8%, on 31 March 2024. While monthly turnover levels were higher during parts of the year compared to 2023–24, they steadily declined in the final quarter.

To enhance confidentiality and gain a deeper understanding of reasons for leaving, we outsourced our exit interview process to an external partner in April 2024. This approach has led to improved participation rates and higher-quality feedback regarding our working environment, culture and relationships. Most of our people leave the Commission for a promotion opportunity in the Civil Service. While we regret all exits, as a small organisation, we welcome the career prospects that entry to the Civil Service can provide and commit to investing in and developing our people to progress in their careers.

We have continued to take active steps throughout the year to ensure that our workforce remains affordable. On 31 March 2025, we employed 200 people, with a full time equivalent of 189.19. Compared with 31 March 2024, this is a reduction of 14.5 FTE. We continue to review and adapt our structures and ways of working to ensure they remain aligned with organisational strategy and needs.

Our sickness absence rate increased, with an average of 8.3 working days lost (AWDL) per employee in 2024–25, compared with 7.9 days in 2023–24. This rise is primarily due to longer durations of long-term absence among a small number of employees, along with an increase in mental health-related absences, both of which have a disproportionate impact within a small organisation. This year, we have focused on strengthening how we manage sickness absence by rolling out targeted training for managers, alongside continuing coaching and support. These measures have helped reduce the number of long-term sickness cases and lowered the average working days lost (AWDL) from a peak of 10.8 days in September.

Our pay gaps

Pay gaps measure the difference in gross hourly earnings between two groups, based on gross salaries paid directly to employees.

- the gender pay gap measures the difference between male and female sexes
- the ethnicity pay gap measures the difference between white British and ethnic minority employees
- the disability pay gap measures the difference between employees who declare a disability and those who do not

The median pay gap is the difference between the midpoints in the ranges of hourly earnings. It takes all salaries in the sample, lines them up in order from lowest to highest, and picks the middle salary. This is the more representative measure of the pay gap because it is not affected by the few individuals who are outliers at the top and bottom of the range.

The mean pay gap is the difference between the average hourly earnings. Our pay gaps are measured as at the previous financial year (2023–24) in line with Civil Service reporting standards. As shown in the table below, on 31 March 2024, we saw reductions in all median pay gaps, with a small increase in two of the mean calculations.

	Median %		Mean %	
Snapshot date	31 March 2024	31 March 2023	31 March 2024	31 March 2023
Gender pay gap	0.2	3.5	2.8	2.8
Ethnicity pay gap	-0.2	4.1	1.4	0.4
Disability pay gap	0.4	4.1	9.8	9.7

All of our median pay gaps have reduced from the 2022–23 figures, with improvements in the distribution of sex, ethnicity and disability across pay quartiles, reflecting overall improvements in equality. Other factors, such as bonus payments, allowances and changes in the distribution of groups within quartiles have widened our mean pay gap.

Factors that affected our pay gaps in 2023–24 include:

- a reduction of 3.3% in the median gender pay gap when compared to 31 March 2023, is primarily due to an increased representation of women in senior roles (the mean gender pay gap remains unchanged)
- more senior male colleagues left the organisation in 2023–24, which reduced the median gender pay gap to 0.2% as the midpoint of male pay fell closer to that of female colleagues
- a higher proportion of female staff joined the EHRC in the year, leading to a greater number receiving a pro-rata bonus payment than males
- an increase in female colleagues holding senior positions within our organisation has contributed to the stabilising of our mean gender pay gap
- flat-rate bonus payments made in 2023–24 equalised median bonus outcomes, but continued to contribute to a mean bonus gap, as more women were in part-time or lower grade roles
- the median ethnicity pay gap shifted to -0.2% (from 4.1% in 2022–23), indicating that ethnic minority staff now earn slightly more than White British colleagues at the median, likely driven by increased ethnic minority representation in higher pay quartiles
- despite this progress at the median, the mean ethnicity pay gap increased slightly to 1.4% (from 0.4%), suggesting a widening of pay distribution among ethnic minority staff, possibly influenced by a concentration of new ethnic minority starters in lower grades
- the median disability pay gap reduced, reflecting improved representation of disabled colleagues in both lower and upper pay quartiles – however, the mean disability pay gap remained high, due to the fact disabled employees are still underrepresented in higher grades overall

Workforce diversity

Our inclusive recruitment practices enabled us to maintain a diverse workforce. Changes in our workforce diversity are outlined in the following table.

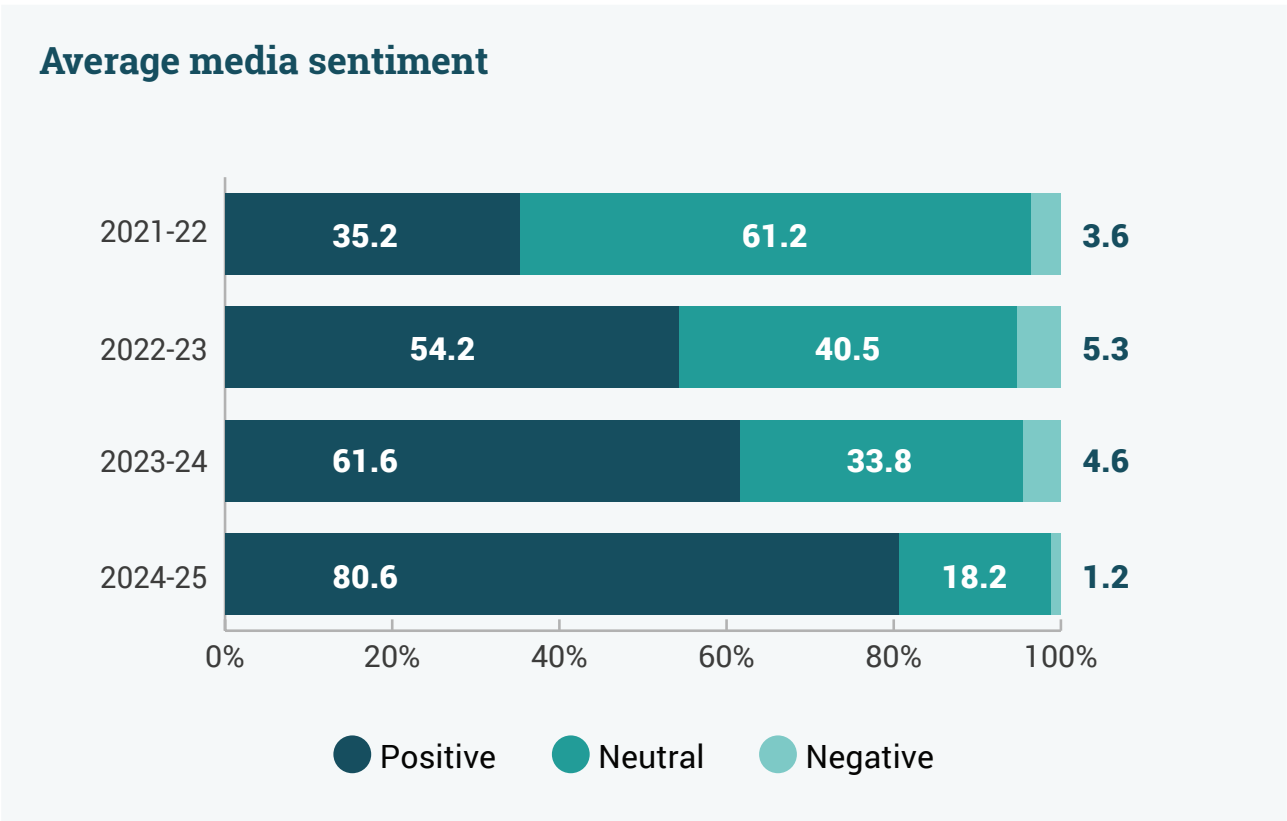
Characteristic	31 March 2025	31 March 2024	Change
Ethnicity			
Ethnic minority	23%	23%	–
White British	72%	73%	-1%
Prefer not to say / not declared	5%	4%	+1%
Sex			
Female	67%	64%	+3%
Male	33%	36%	-3%
Prefer not to say / not declared	–	–	–
Marital status			
Married or in a civil partnership	42%	42%	–
Not married or in a civil partnership	40%	43%	-3%
Prefer not to say / not declared	18%	15%	+3%
Religion or belief			
Religion or belief	34%	30%	+4%
No religion or belief	54%	59%	-5%
Prefer not to say / not declared	12%	11%	+1%
Disability			
No	69%	73%	-4%
Yes	21%	19%	+2%
Prefer not to say / not declared	10%	8%	+2%
Sexual orientation			
Lesbian, gay, bisexual, other	13%	11%	+2%
Heterosexual / straight	73%	76%	-3%
Prefer not to say / not declared	14%	13%	+1%

Characteristic	31 March 2025	31 March 2024	Change
Caring responsibilities			
No	50%	51%	-1%
Yes	41%	43%	-2%
Prefer not to say / not declared	9%	6%	+3%
Age			
16–24	*	*	—
25–34	31%	28%	+3%
35–44	26%	29%	-3%
45–54	23%	25%	-2%
55+	20%	18%	+2%
Gender reassignment			
No	89%	91%	-2%
Yes	*	*	—
Prefer not to say / not declared	*	*	—

* information about groups of fewer than five is not published to protect anonymity

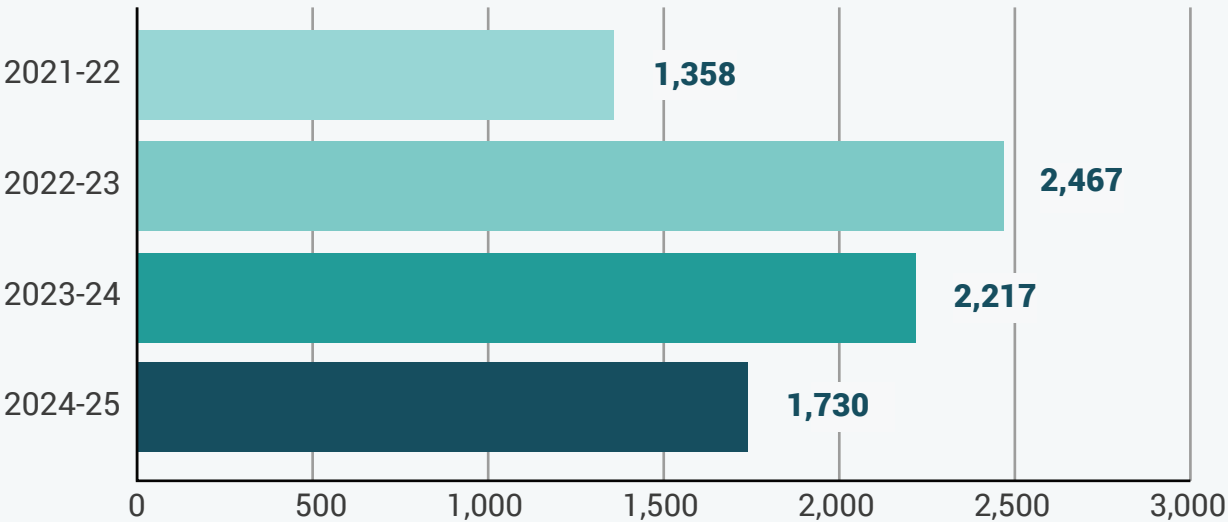
Communications

In 2024–25* we achieved a substantial increase in the proportion of positive media coverage. Positive average media sentiment rose from 61.6% in 2023–24 to 80.6% in 2024–25, with negative average sentiment decreasing from 4.6% in 2023–24 to 1.2% in 2024–25. In three months during 2024–25 (July, September and December) there was no negative media coverage.



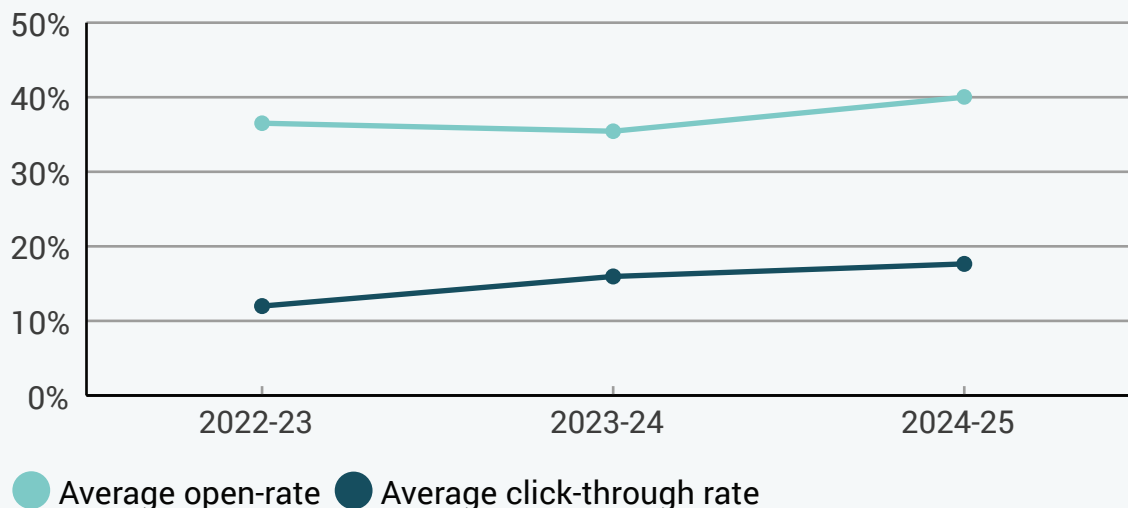
* Average media sentiment data for 2024–25 is from the 11 months from 1 April 2024 to 28 February 2025, as a change in our media monitoring supplier means sentiment data for March 2025 is unavailable.

Total media mentions



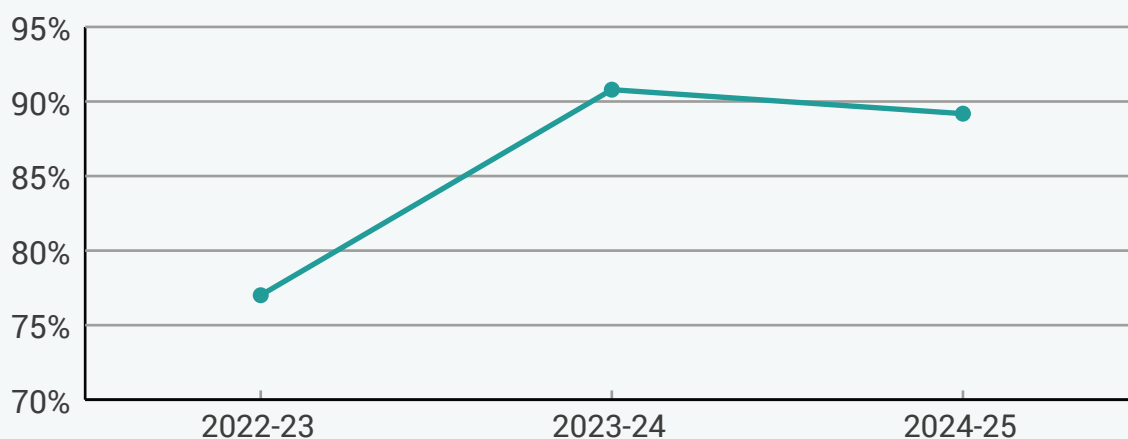
Our total media mentions from 1 April 2024 to 31 March 25 (1,730) were fewer than in 2023–24 (2,217), but this still represents an increase on 2021–22 (1,358). In line with Cabinet Office guidance, we observed constraints on our communications activity during the pre-election period from late May to early July 2024, which impacted upon our total media mentions for the year.

Average stakeholder newsletter engagement



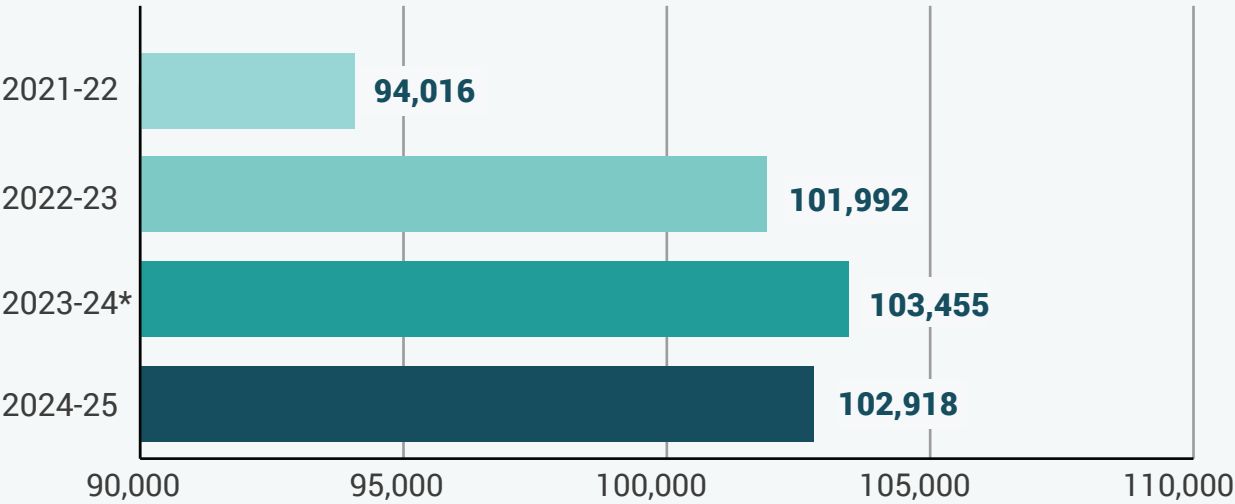
During 2024–25 we have continued to engage with stakeholders through our newsletter mailouts. We issued 10 stakeholder newsletters in 2024–25 and saw an average open rate of 40% and an average click through rate of 18%. These showed a slight improvement from 2023–24 (open rate 36%, click through rate, 16%).

Internal newsletter engagement rate



We continue to measure engagement with our internal newsletter through the open-rate for the e-mail update. This year we saw an average of 89% open-rate across the full year. This is compared with 91% in 2023–24 and continues to be at a much higher rate than previous years. We have delivered online monthly all staff calls, which are well attended by our staff and senior management, and we also held an in-person all-staff event in May 2024.

Social media followers



*updated figure for 2023–24 (was previously reported as 111,272)

The increase in followers in 2023–24 and subsequent drop in 2024–25 are caused by X (Twitter) removing bot / faceless accounts. With these accounts removed, the figure for 2023–24 would have instead been 103,455 which means a small overall decrease in followers on social media platforms.

Performance report

Sustainability reporting

The Greening Government Commitments (GGC) set out the actions government departments and their agencies need to take to reduce their impacts on the environment in the period 2021–2025. Our three-year ESG statement is based on these commitments. The EHRC recognises that taking action related to sustainability is a key priority for colleagues at every level and contributes towards ensuring that the government meets its net zero objectives with the resources available.

As a non-departmental public body with fewer than 250 employees, we were previously exempt from the mandatory sustainability and environmental reporting requirements. Our data from 2022–23 is our baseline for comparison and reporting includes data for those years.

We recognise that carbon offsetting may become a feature of future net-zero planning, but for now we are focused on achieving reductions.

In addition to our reporting obligations, we are committed to maintaining ethical and sustainable business practices, which consider the social, economic and environmental impact of our work. In 2024–25, we continued to take practical action to review and improve our processes to embed consideration for the environment into all relevant decision making. We also took steps to improve our internal capability and understanding of sustainability and carbon literacy, supported by an employee-led sustainability network.

We have continued to invest in our sustainability network which have championed sustainability issues and have been engaged in key processes, such as business planning, the delivery of our in-person all staff event and the development of this report. The network has provided advice and guidance to the organisation including about ways to tackle plastic pollution, making sustainable purchases and improving recycling in the workplace.

Members of sustainability network have delivered training about carbon literacy and about how to use the corporate travel management booking system to identify travel and accommodation options with a lower carbon footprint.

We have increased the maximum value that employees can request under the Cycle to Work scheme to £3,000. This enhancement provides employees with greater flexibility to invest in high-quality equipment, supporting both personal wellbeing and environmental sustainability.

We have also tried to reuse items from our former London and Glasgow offices as we moved location and to support our policy in reducing waste and recycling.

Performance reported is in line with the minimum reporting requirements for GGC. Data is included from 2022–23, as noted in the introductory text. In this financial year we have moved offices in two of our locations, from Windsor House, Westminster to fully serviced accommodation in Tintagel House in Vauxhall and from temporary home working in Glasgow to new accommodation in West George Street. This will affect some of our comparative data.

EHRC is a minor tenant in all buildings occupied and is therefore not the decision maker regarding most areas covered by GGC. Apart from Arndale House, Manchester and West George Street, Glasgow, where our electricity consumption is separately metered, energy usage, other utilities and services are recharged to us based on the percentage of the floor area of the building we occupy rather than on actual consumption. Where available from the landlord, the metrics reported are extrapolated from our percentage occupancy of the property.

We are not able to report on our former London office, Windsor House, as this data is no longer available to us. In Cardiff, 80% or more of the property was occupied by Companies House who will report for the whole building. Data for the whole of Tintagel House is available at a building level and it is not possible to disaggregate costs for the EHRC space because, with only 16 desks, we represent such a small proportion of the overall office space. Therefore, our report does not include data for this office.

We have therefore only included data from our Manchester office, Arndale House, and West George Street in Glasgow to the extent the information is available.

The following reporting areas set out in the minimum reporting requirements are not applicable:

- **Nature recovery and biodiversity action planning** – the EHRC does not have any landholdings or natural capital.
- **Travel car fleet** – the EHRC does not own, lease or hire any car fleets.

Mitigating climate change: working towards net-zero by 2050

GGC target:

Reduce overall emissions by 52% and reduce direct emissions by 20% from the 2017–18 baseline by 2024–25, with a view to net-zero by 2050.

Greenhouse gas (GHG) emissions		2024 –25	2023 –24	2022 –23
Tonnes of carbon dioxide equivalent (tCO ₂ e)	Scope 1 (direct) emissions	6.72	12.51	10.99
	Scope 2 (energy indirect) emissions	13.17	13.62	16.82
	Scope 3 (official business travel – domestic) emissions	22.46	21.95*	5.27
	Total greenhouse gas emissions	55.70	41.65	33.08
Kilowatt hours (kWh)	Energy electricity green tariff (scope 2 and 3)	831**	–	–
	Mains standard grid electricity consumption (scope 2 and 3)	59,047	87,212	87,000
	Natural gas	30,562***	67,835	60,220
	District heating systems	–	–	–
	Heat from other sources	–	–	–
	Total related energy use	90,440	155,047	147,220
£	Expenditure on energy	17,319	9,747	9,090****
	Expenditure on official business travel	251,371	193,220	148,298
	Total related expenditure	268,690	202,967	157,388

The table above includes data relating to the Arndale House (Manchester) and West George Street, Glasgow buildings.

* This was reported as 15.52 tCO₂e in 2023–24, we have recalculated with updated data, and this should have been 21.95. We have restated the figure in this report

** Glasgow Office only, in scope from 04 March 2025

*** Data relates only to Arndale House, Manchester

**** Does not include West George Steet, Glasgow as CO₂ data not available and cannot be calculated by us.

A new Green Energy Tariff contract was signed in February 2025 for the Glasgow Office for one year, based on an estimated 11,000 kWh annual consumption.

Expenditure on business travel has increased, partially due to price rises, but we are encouraging our teams to make greener choices where possible, and our provider includes information about sustainability when booking.

Domestic and international flights

GGC target:

Report the distance travelled by international business flights, with a view to better understanding and reducing related emissions where possible.

In 2024–25, we travelled 17,057 miles (14,787 kilometres) by domestic flights, releasing 4.03 tonnes CO₂e (with RF) emissions. The main reasons for domestic travel are face to face meetings in our offices (for staff and Board members).

In 2024–25, the distance travelled by international flights was 20,032 miles (32,238 kilometres), releasing 5.92 tonnes CO₂e (with RF) emissions. This includes staff travelling to attend conferences in Europe (Geneva / UN).

We continue to encourage all staff to always use lower carbon travel options where possible. Our central booking system makes the climate impact of travel clear to the user. We have improved technologies in offices, and for use at home, that further enable hybrid working between teams from multiple locations.

Minimising waste and promoting resource efficiency

GGC target:

Reduce the overall amount of waste generated by 15% from the 2017–18 baseline.

We remain committed to our reuse rather than recycle principles and are looking at supporting furniture and digital poverty schemes by donating surplus equipment where practicable and cost effective.

		2024–25	2023–24	2022–23
Tonnes	Total waste reused or recycled externally (excluding ICT waste)	–	0.624	0.369
	Total ICT waste: recycled (externally)	0.898	–	–
	Total ICT waste: reused (externally)	–	–	–
	Total waste incinerated with energy recovery	–	–	–
	Total waste incinerated without energy recovery	–	–	–
	Total waste composted or sent to anaerobic digestion	–	–	–
	Total waste recycled	0.898	0.624	0.369
	Total waste to landfill	–	0.828	0.335*
	Total waste	0.898	1.452	0.704
	£000's Total waste disposal cost**	Not available	Not available	Not available

* We are unable to report our waste statistics for our Manchester Arndale office because the waste and recycling data available is for the entire shopping centre and office building. Our space apportionment of 3% is not deemed a reliable factor in calculating our proportion. The data for previous years relates only to Windsor House London which we vacated in September 2024.

** Waste disposal costs are contained within contracts covering service charges and office cleaning and are not separately identifiable.

Paper consumption

GGC target:

Reduce government's paper use by at least 50% from a 2017–18 baseline.

EHRC came into scope for this target in 2022. We have used 2022–23 as our baseline measurement although a retrospective comparison with print data from 2017–18 indicates a significant reduction from the 1,150,000 pages printed during that period.

In 2024-25, we procured 41 reams of A4 paper in total across all sites, compared with 117 reams in 2023–24. We purchase only recycled paper which is further recycled after use where possible. Queued print jobs that are not released within 48 hours are automatically deleted and therefore are reported as a saving.

	2024–25	2023–24	2022–23
Reams of paper procured (A4 equivalent)	41	117	5
Cost of paper (£)	180.00	365.81	17.97
Printed output	36,996 (sheets) (470kg CO ₂)	38,810 (sheets) (493kg CO ₂)	74,027 (sheets) (562kg CO ₂)
Savings from print jobs not released	2,274 (sheets) (30kg CO ₂)	9,123 (sheets) (116kg CO ₂)	11,359 (sheets) (80kg CO ₂)

Reducing our water waste

GGC target:
Reduce water usage by 8% against the 2017–18 baseline.

Costs for utilities form part of a total service charge from our landlords and are not identified separately.

We only receive water consumption data for our Manchester office; based on the figures provided our water consumption has reduced by 15m³; 4% compared to 2023–24.

		2024–25	2023–24	2022–23
Water consumption	Cubic metres (m ³)	351	366	518
Total water cost	£000	Not available	Not available	Not available

Procuring sustainable products and services

The EHRC is committed to sustainability in the way goods are procured. This includes:

- embedding the UK government’s overarching priorities of value for money and streamlining procurement processes
- adhering to reporting requirements by publishing data on environmental impact
- evaluation criteria to include social and economic factors in addition to environmental factors where applicable
- using Crown Commercial Service frameworks to offer solutions that comply with all relevant standards and include sustainability factors as a criterion for award
- enabling the delivery of social value in public sector contracts through effective contract levers
- supporting small and medium-sized enterprises through our procurements

Reducing environmental impacts from ICT and digital

We operate a sustainable portfolio of ICT services. Where new opportunities arise, we consider from the outset the whole life environmental and landfill impacts. We have continued expanding our use of cloud services and reducing the need for legacy physical infrastructure in 2024–25. Where we have a requirement for new physical IT infrastructure, we have ensured that new equipment is sized according to our needs. Our cloud partner aims to be carbon negative, water positive, zero waste, and to protect more land than they use by 2030.

The regular use of cloud-based telephony and video conferencing equipment strengthens hybrid working and facilitates effective online meetings between teams based in various locations across the UK. This reduces the need for both staff and external stakeholders to travel to every meeting.

Performance report

Going Concern

The financial statements have been prepared on a going-concern basis. This is based on our assessment that we will continue to receive funding, and our operations will continue for the foreseeable future.

This assessment has also considered that, for non-trading public sector entities such as the EHRC, the government financial reporting manual (FReM) provides that 'the anticipated continuation of the provision of a service in the future, as evidenced by inclusion of financial provision for that service in published documents, is normally sufficient evidence of going concern'.

The Equality Act 2006 requires the Secretary of State to provide sufficient funding for us to carry out our statutory functions and we are financed through grant-in-aid from our sponsoring department, the Cabinet Office. Our 2025–26 budget and grant-in-aid funding is included in the Cabinet Office main estimates for the year, and we have been issued our budget delegation for 2025–26, which confirms an RDEL total of £17.157m and a CDEL total of £0.5m.



John Kirkpatrick

Chief Executive and Accounting Officer

15 July 2025

Accountability report

The accountability report includes the corporate governance report, the remuneration and staff report and the parliamentary and audit report.

Accountability report

Corporate governance report

The corporate governance report explains how our governance, risk management, internal control arrangements and management structures support the delivery of our three-year strategic plan and our annual business plan. This includes how we measure progress against both plans and provide assurance of the effectiveness of our internal controls.

The Board of Commissioners, chaired by the Chairwoman, determines corporate strategy and oversees corporate performance. It receives advice and assurance from its statutory Scotland and Wales Committees. It is also advised by its Audit and Assurance Committee and its People and Workspace Committee.

Two additional committees were formed in 2024–25, the Public Reporting Committee (PRC) and the Remuneration Committee (RC). Further details of these and their remit is provided on pages 79 to 80.

The Leadership Team, chaired by the Chief Executive, is responsible for operational decisions. It delivers to the objectives set by the Board, and for all aspects of performance, delivery and business improvement.

Board of Commissioners

The Board of Commissioners is our most senior decision-making body. Responsibilities of the Board include setting the strategic direction, monitoring and reviewing overall performance and delivery of the organisation, and ensuring good governance. The management of day-to-day operations, including staff, is delegated to the Chief Executive, supported by the Leadership Team. The Chief Executive reports to the Board on performance against priorities and how resources are used, and also provides assurance that this is effective and efficient.

The Chairwoman is responsible for setting the Board's agenda, ensuring that meetings are conducted properly and promoting openness in debates to ensure that items are adequately discussed and decisions are made.

The UK government's Minister for Women and Equalities appoints our Board members. Profiles of our current Commissioners are on our [website](#) and details of their terms of office are in the remuneration of Board members report on page 101.

On 31 March 2025, the Board comprised seven non-executive members. The Chief Executive is a Commissioner ex-officio. Three Commissioner's terms ended in 2024–25 and one additional Commissioner was appointed. In the absence of a Wales Commissioner, the Chair of the Wales Committee attends Board meetings as a representative. The recruitment for a new Chair and additional Commissioners is currently underway and will continue into 2025–26.

There were seven routine and four additional Board meetings during 2024–25. Attendance at meetings is shown on page 72.

Board meetings cover all aspects of our work on regulation, policy, strategy and corporate services as well as emerging equality and human rights issues.

Board priorities for 2024 to 2025 included:

- developing the 2025–28 strategic plan
- considering opportunities for the organisation to engage the change in UK government in July 2024
- developing internal policy, the organisational governance review and improvements
- implementing the new sexual harassment enforcement duties
- other organisational delivery and outcomes from the business plan

The Board received updates from the chair of each Committee at every meeting, which provided further assurance and strategic advice.

The Board also receives business updates and performance reports from the Chief Executive which outline progress against the business plan, and any emerging issues. The Board recommends actions based on the content of the reports but is generally content with the information provided and the frequency.

Board meeting attendance	
Name	Attendance / eligibility
Baroness Kishwer Falkner (Chairwoman)*	10/10
Dr Lesley Sawers (Deputy Chair)	11/11
Jessica Butcher (until 30 November 2024 when term ended)	9/9
Baroness Joanne Cash	11/11
David Goodhart (until 30 November 2024 when term ended)	9/9
Alasdair Henderson	9/11
Kunle Olulode**	8/10
Akua Reindorf	9/11
Su-Mei Thompson (until 30 November 2024 when term ended)	6/9
Martyn Jones***	6/8
Keith Richards (appointed 13 November 2024)	1/3
John Kirkpatrick (Chief Executive)****	10/10

* The Chairwoman was recused from one meeting of the Board.

** Kunle Olulode did not attend one meeting of the Board because he was engaged on Commission business

*** Martyn Jones, as acting chair of the Wales Committee, represented the Committee at Board meetings for the duration of 2024–25 in the absence of a Wales Commissioner. He was not required to attend the special Board meetings on 17 April, 21 May or 10 September 2024.

**** John Kirkpatrick was appointed Interim Chief Executive from 1 April 2024, and then Chief Executive from 21 August 2024. The Chief Executive was recused from one meeting of the Board.

Committees of the Board

The board receives support and advice from six Committees.

Scotland Committee

The Scotland Committee uses its statutory powers in the Equality Act 2006 to advise the Board on the impact of work in Scotland and to advise about new laws, or proposed changes to the law that affect only Scotland.

The Scotland Committee held four formal meetings during 2024–25 and two special meetings. The Committee is chaired by the Scotland Commissioner, Dr Lesley Sawers. In 2024–25 the Scotland Committee gave advice to the Board on matters that impact in Scotland including:

- the development of the strategic plan 2025 to 2028
- the 2025–26 Business Plan
- the stakeholder engagement strategy
- the EHRC's progress on a Memorandum of Understanding with the Scottish Human Rights Commission and in response to the Sub-Committee on Accreditations recommendations

The Committee considered analysis of the UK Government and Scottish Government programmes of activity for 2024–25, the Data Dashboard and Scotland academia engagement programme and advised about the progress on work related to our Uniformed Services programme in Scotland.

The Committee also advised the Board on its response to the appeal by For Women Scotland to the Supreme Court in their case against Scottish Ministers.

The Scotland Commissioner held meetings with stakeholders throughout the year, these included:

- a meeting with the Registrar General and Keeper of the Records of Scotland to discuss the outcomes of the latest Scottish census held in 2022
- a meeting with the new Scottish Children's Commissioner, Nicola Killean, to discuss our strategic priorities
- meeting the Scottish Government Minister for Employment and Investment to discuss the EHRC's new guidance on sexual harassment
- meeting the UK Government Secretary of State for Scotland to discuss shared priorities
- meeting the Chair of the Scottish Human Rights Commission, Professor Angela O'Hagan, securing commitment for the two organisations to review our Memorandum of Understanding, the EHRC Chairwoman also attended this meeting
- meeting, along with the Scotland Committee, the Scottish Government Minister for Equalities to discuss the government plans for reform of the public sector duties and other priorities
- leading the recruitment for two new Scotland Committee members
- attending the UK Government Scotland Office International Women's Day event in Edinburgh to represent the Commission

More information about the Scotland Committee and its work is on [our website](#).

Scotland Committee meeting attendance	
Name	Attendance / eligibility
Dr Lesley Sawers (Chair)	6/6
Mariam Ahmed	6/6
Mandy Rhodes	5/6
David Stirling (from 19 January 2025)	1/1
Arlene Stokes	4/6
Lesley Thomson	6/6
Adam Tomkins	4/6

Wales Committee

The Wales Committee uses its statutory powers in the Equality 2006 to advise the Board on the impact of work in Wales and give advice about new laws or proposed changes to the law that affect only Wales.

The Wales Committee held four formal meetings during 2024–25 and two special meetings. The post of Wales Commissioner remained vacant during 2024–25 and Martyn Jones, Wales Committee Member, has chaired the Wales Committee and represented the Wales Committee at Board meetings.

In 2024–25, the Wales Committee gave advice to the Board on matters that impact equality and human rights in Wales, including:

- the development of the final 2025–28 Strategic Plan
- the 2025-26 Business Plan
- the Stakeholder engagement strategy
- progress in response to the Sub-Committee on Accreditations recommendations

The Committee reviewed the Wales Impact report which is used to trigger a debate in the Senedd on Equality and Human Rights.

The Committee considered the Equality Action Plans and unimplemented Equality Act 2010 provisions and the Human Rights Tracker. Members also considered an analysis of the UK government's and Welsh Government's programmes of activity for 2024–25, the new First Minister and cabinet commitments.

In the continued absence of a Wales Commissioner, Martyn Jones, interim Chair of the Committee, held stakeholder meetings on behalf of the Committee. He met with the Cabinet Secretary for Social Justice on a number of occasions on a range of equality and human rights matters and chaired a roundtable for regulators, inspectors and ombuds on shared priorities.

Wales Committee meeting attendance	
Name	Attendance/eligibility
Martyn Jones (Interim Chair)	6/6
Chris Dunn	6/6
Helen Mary Jones	5/6
Lauren McEvatt (from 01 July 2024)	5/5
Bethan Thomas	5/6
Mary van den Heuvel	5/6
John Williams (from 01 July 2024)	5/5

More information about the Wales Committee and its work is on [our website](#).

Audit and Risk Assurance Committee

The Audit and Risk Assurance Committee (ARAC) supports the Board, and the Chief Executive as Accounting Officer, by providing independent advice and challenge about governance arrangements, risk management approaches and control frameworks. This is to provide assurance that all are in place and effective.

The Committee operates in line with the guidance and good practice principles set out in HM Treasury's 'Audit and Risk Assurance Committee Handbook' and the Cabinet Office's 'Code of Conduct for Board Members of Public Bodies' (June 2019).

The ARAC is chaired by Kunle Olulode, Commissioner. There were five formal meetings during 2024–25 and two informal review meetings, one to review the 2023–24 Annual Report and Accounts draft and one to review the internal audit plan for 2025–26.

In 2024–25, the ARAC considered financial and operational performance, risk management, compliance with policy, internal audit reports and progress with audit recommendations. They specifically reviewed the updated whistleblowing policy. An effectiveness review of the ARAC was launched in line with planned timelines for Committee reviews.

ARAC meeting attendance	
Name	Attendance / eligibility
Commissioners	
Kunle Olulode (Chair)	7/7
Baroness Joanne Cash	7/7
Dr Lesley Sawers (from 20 November 2024)	1/3
Su-Mei Thompson (until 30 November 2024 when term ended)	2/4
Members	
Gill Eastwood (to 30 September 2024 when term ended)	2/3
Reyaaz Jacobs (from 01 October 2024)	4/4
Charlotte Moar	7/7

More information about the ARAC can be found on [our website](#).

People and Workspace Committee

The People and Workspace Committee (P&WC) provides advice and assurance on matters affecting employees, infrastructure and environmental impact.

The P&WC held four formal meetings during 2024–25. There were no informal or special meetings. It was chaired by Baroness Joanne Cash, Commissioner.

In 2024–25, the P&WC provided advice and assurance to the Board on matters including workplace policies, our sexual harassment risk assessment and preventing sexual harassment communications plan. They considered staff issues, including the 2024 people survey, executive pay processes and 2024–25 pay and reward. They also considered learning, development and inclusion programmes. The committee received reports about the estates strategy including a review of office attendance and health and safety. They also provided oversight and assurance for the establishment of the Remuneration Committee and its Terms of Reference as well as considering Commissioner remuneration. The committee received updates about the Building our Commission and Reset and Renewal 2024 programmes and reviewed the closure of these programmes.

The Committee also provided oversight for strategic and operational delivery, such as our gender pay gap reporting, workforce diversity reporting, and risks including those relating to people, infrastructure, estates and information governance.

P&WC meeting attendance	
Name	Attendance / eligibility
Commissioners	
Baroness Joanne Cash (Chair)	4/4
Jessica Butcher (until 30 November 2024 when term ended)	3/3
Akua Reindorf	2/4
Su-Mei Thompson (until 30 November 2024 when term ended)	2/3
Independent member	
Jonathan Parsons	4/4

More information about the P&WC is on [our website](#).

Public Reporting Committee

The Public Reporting Committee (PRC) was established in 2024–25 to ensure that the EHRC’s reports, submissions and other knowledge outputs fulfil our statutory duties, reflect our policy positions and fulfil the Board’s ambitions for quality and impact.

The PRC held two formal meetings during 2024–25. There were no informal or special meetings. It was chaired by Alasdair Henderson, Commissioner.

Planned outputs for review include:

- our statutory report to Parliament on progress in society towards equality and human rights in Great Britain
- monitoring and reporting to the United Nations
- public speeches and announcements
- representations made to the UK, Scottish Parliament and the Senedd (or their committees) and the UK, Scottish and Welsh Governments

In 2024–25, the PRC considered the following matters:

- defining quality in public reporting
- our report to the UN Committee on Economic, Social and Cultural Rights
- publication of Equality Impact Assessments
- advice to the Board regarding legal interventions

PRC meeting attendance	
Name	Attendance / eligibility
Commissioners	
Alasdair Henderson ((Chair) appointed 1 December 2024)	2/2
Baroness Joanne Cash	2/2
Baroness Kishwer Falkner	2/2
Akua Reindorf (from 20 November 2024)	1/1
Keith Richards (from 20 November 2024)	0/1
Appointees	
David Goodhart (from 1 December 2024)	2/2
Su-Mei Thompson (from 1 December 2024)	2/2

Remuneration Committee

The Remuneration Committee (RC) was established in 2024–25 with the purpose of ensuring that:

- public money is used efficiently and effectively in relation to senior executive pay and conditions
- all decisions on pay and performance support the Board in its responsibilities with regard to the EHRC Framework Document, Managing Public Money and other relevant public standards
- the Board is satisfied that the standards and objectives set for the senior leadership of EHRC are appropriate and match the Board's ambitions

The RC operates as a subcommittee of the P&WC. Baroness Joanne Cash, as Chair of the P&WC, is also Chair of the RC. The Committee further consists of the Chair of the Board, the Deputy Chair of the Board and the Chair of the ARAC. The RC did not meet in 2024–25.

Accountability report

Statement of Accounting Officer's responsibilities

Under the Equality Act 2006, the Secretary of State, with the consent of HM Treasury, has directed the EHRC to prepare for each financial year a statement of accounts in the form and on the basis set out in the Accounts Direction.

The accounts are prepared on an accruals basis and must give a true and fair view of the state of affairs of EHRC, its income and expenditure, statement of financial position and cash flows for the financial year.

In preparing the accounts, the Accounting Officer is required to comply with the requirements of the Government Financial Reporting Manual, and in particular, to:

- observe the Accounts Direction issued by the Secretary of State, with the consent of HM Treasury, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis
- make judgements and estimates on a reasonable basis
- state whether applicable accounting standards, as set out in the Government Financial Reporting Manual, have been followed, and disclose and explain any material departures in the financial statements
- prepare the financial statements on a going-concern basis
- confirm that the Annual Report and Accounts is as a whole, fair, balanced and understandable

Additionally, the Accounting Officer must confirm that they take personal responsibility for the Annual Report and Accounts, and the judgements required for determining that it is fair, balanced and understandable.

The Principal Accounting Officer of the Cabinet Office appoints the Chief Executive as Accounting Officer of EHRC. The responsibilities of the Accounting Officer include the propriety and regularity of the public finances, for which the Accounting Officer is answerable, keeping proper records and safeguarding EHRC's assets. These responsibilities are set out in 'Managing Public Money', published by HM Treasury.

As the Accounting Officer, I have taken all the steps I ought to have taken to make myself aware of any relevant audit information and to establish that EHRC's auditors are aware of that information. As far as I am aware, there is no relevant audit information of which the auditors are unaware.

Governance Statement

The EHRC is a statutory non-departmental public body established by the Equality Act 2006. It is Britain's national equality body, recognised as an 'A' status National Human Rights Institution by the Global Alliance of National Human Rights Institutions. It operates independently of government and Parliament.

I was appointed as Chief Executive and Accounting Officer on 21 August 2024. Before my substantive appointment I held the role of Acting Chief Executive and Interim Accounting Officer from 1 April 2024. This Governance Statement, for which I, as Accounting Officer, take responsibility, is designed to give an understanding of our governance structure, internal controls and risk management processes and explains how assigned duties have been carried out during 2024–25.

Scope of Responsibility

I have responsibility for maintaining a system of internal control that supports the delivery of our policies, aims and objectives while safeguarding public funds allocated to the EHRC and our assets. My role, supported by the Leadership Team and working with the Board and its advisory Committees, includes ensuring that steps are taken to prevent and detect fraud, in accordance with the responsibilities assigned to me in 'Managing Public Money' and our Framework Document.

Corporate governance structures

Our corporate governance structures and information on how we are required to report to Parliament are set out in the Equality Act 2006.

The relationship with our sponsor department, the Cabinet Office, is agreed through a Framework Document, which contains details of my responsibilities as the Accounting Officer of EHRC.

The Framework Document is on [our website](#). It is in the process of being updated and is currently under review by our sponsoring body, the Office for Equality and Opportunity. Our Annual Report and Accounts are laid before Parliament by the Cabinet Office, and copies of the report are sent to the Scottish Parliament and the Senedd Cymru (Welsh Parliament).

More information about our corporate governance structures is on [our website](#).

Board of Commissioners

Details of the Commissioners who served as members of the Board during 2024–25 are on pages 102 to 105. During the year three Commissioners terms ended, and one was appointed.

Commissioners are expected to demonstrate integrity, honesty, objectivity and impartiality in line with the Seven Principles of Public Life (Nolan principles). They are required to disclose any relationship that could be or be perceived to be a conflict when participating in Board decisions. We maintain a register of Commissioners' interests. A declaration of interests is a standing item on Board agendas, with Commissioners reminded to keep the register up to date, and to declare any potential interests in advance of meetings.

The Commissioners' register of interests is on [our website](#).

The Board is responsible for setting overall corporate strategy, policy and annual business plans. The specific role, responsibilities and functions of the Board and its committees are set out in our Governance Manual, prepared in line with the Cabinet Office 'Code of Best Practice for Board Members of Public Bodies' and the UK government's 'Corporate Governance in Central Government Departments: Code of good practice'. Our Governance Manual, along with the Equality Act 2006 and our Framework Document, act as the Board's terms of reference.

An external governance review of the Governance Manual and the processes for resolving complaints and concerns, which commenced in 2023–24, produced a report with recommendations for Board to consider in May 2024. A renewed and strengthened Governance Manual based on the recommendations made was produced together with a clarified and separate Commissioner and Committee Member Code of Conduct. A fully detailed new 'Board and Committee Member Concerns and Complaints Policy: non-compliance with the Code of Conduct' was produced as an appendix to the Code of Conduct setting out a clear and fair procedure for dealing with any allegations and complaints against Commissioners and Committee Members. At the date of publication, we have no investigations being handled through this process.

The Governance Manual is on [our website](#).

The Corporate Governance Code was written for government departments rather than public bodies and advises having an 'approximately equal number of ministers, senior civil servants, and non-executives'. Our Board contains no ministers and comprises non-executive Commissioners in accordance with the Equality Act 2006, which requires the Secretary of State to appoint a board of between 10 and 15 Commissioners. We currently only have 7 non-executive Commissioners and are awaiting the appointment of further Board members during 2025–26. Members of the Board have a good balance of skills and experience to enable it to fulfil its responsibilities and they are supported by committee members, independent members and co-opted members on the advisory and statutory Committees.

The minutes of Board meetings are on [our website](#).

Board performance and effectiveness

The Board carries out an external review of effectiveness every three years. We have made improvements since our last effectiveness review, including changes to the governance manual and updates to the code of conduct, which reflect the recommendations made then. We were advised through a governance review in 2023–24 to delay the next effectiveness review but have continued to make improvements to the organisation through an internal programme of work. Steps have been taken to increase the level of Commissioner oversight with the creation of two new advisory Committees:

- the Public Reporting Committee
- the Remuneration Committee

In 2024, the Board also reviewed and refreshed its corporate risk policy which describes the tools and processes we use to manage our risk and how they provide us with assurance. The policy has been developed with reference to the UK Government's Orange Book. Associated tools and processes have been developed proportionately to the size of our organisation and in line with the needs of the Commission for risk management.

Senior Management

Senior Management support the Chief Executive, particularly in their role as Accounting Officer, the Board and its advisory Committees in the development and implementation of the corporate strategy and annual business plan. They provide leadership to staff and oversight for the delivery of the organisation's programmes, projects and regulatory activity as well as setting work priorities, monitoring performance and managing risk.

The Leadership Team is chaired by the Chief Executive, and is attended by the Deputy Chief Executive, Directors and some functional leads. It meets on a weekly basis. Staff are regularly invited to present reports and to understand the processes behind decision-making on issues. Time is dedicated monthly to review the organisation's delivery performance and progress against other key metrics. One meeting each month is also dedicated to the implementation of the strategic plan and the organisational changes required to achieve its delivery.

The Leadership Team is responsible for:

- ensuring the effective management of the organisation including matters concerning EHRC as a whole, such as leadership strategies, culture, governance, relationships with key stakeholders, three nations approach, risk management and compliance with legal and other obligations
- ensuring the organisation's business is delivered effectively and with impact, including the delivery of the strategic and business plans and the Annual Report and Accounts for onward referral to the Board for approval, resourcing and / or reprioritising work for existing and new programmes or projects and approving and identifying leads for leading new work
- leading and developing the organisation through a collective leadership approach, regular review of feedback and commitment to organisational improvement
- relationships with the Board and its Committees, including how matters are escalated, and responding to work requested by the Board

Project and programme management

Our work over the course of the 2022–25 strategic plan has been predominantly programme-led, while our next strategic plan will introduce a greater focus on agile and responsive work. We have focused on finishing our ongoing activity well and preparing for a new balance in how we deliver.

In 2023–24, we introduced a project delivery methodology aligned with Government Functional Standards. This methodology was refreshed in 2024–25, better defining processes for managing change, project gateways, progress reporting and standardised deliverables across projects.

As part of this methodology, the EHRC has established a robust governance framework to support both change management and project delivery. A key component of this framework is a corporate level Portfolio Group which oversees cross-cutting organisational decisions on project and programme direction and resourcing. The Portfolio Group is part of the Leadership Team meeting cycle and is responsible for decision-making, approving project gateways and change requests and reviewing new work escalated to the group. This approach enables co-ordinated decisions on resources, reputational risks and other critical factors.

To ensure effective oversight, monthly reviews of project activities are held with Directors through Functional Delivery Review meetings. At each review, the Functional Director responsible for each project will report on delivery progress, risks and issues, and highlight any exceptions to the plan, such as budget variance, timeline changes or new risks. The Functional Director is also responsible for making day-to-day decisions and ensuring that the project remains aligned with the overall strategy.

Information management

Information governance and the protection of assets containing personal and sensitive data are a priority for us. We have strong professional governance arrangements in place with a member of the Leadership Team acting as the Senior Information Risk Owner (SIRO) working closely with the Data Protection Officer (DPO) and we have appointed Data Owners and Data Champions in every team.

The SIRO chairs an Information Governance Steering Group that maintains oversight of data protection, information security and records management. A monthly report is presented to Leadership Team and an annual Information Governance Assurance Report goes to the Audit and Risk Assurance Committee.

During 2024–25, we:

- successfully processed a large volume of complex information requests
- investigated all data incidents to assess risk and monitor patterns

- arranged refresher training for staff on security and data protection
- delivered bespoke training for Commissioners and committee members, and for key business areas including those involved in enforcement matters
- ensured all Data Owners and Data Champions reviewed their Information Asset Registers
- progressed our work with the National Archives (TNA) to dispose of records of legacy commissions that are over twenty years old, and to identify those that meet the criteria for transfer to TNA to meet our Public Records Act obligations
- ensured data protection involvement in key projects, including starting to build records management capacity in Microsoft SharePoint, updated privacy notices, policies, procedures, technical and organisational security controls as necessary
- started to consider the benefits of Artificial Intelligence in-house, whilst ensuring robust information governance controls to safeguard data

Personal data incidents

Between 1 April 2024 and 31 March 2025, seven 'low' or 'no' impact data breaches were reported (compared with twelve in 2023–24). There were no 'high impact' incidents in this period, and no incident required reporting to the Information Commissioner's Office (ICO). All incidents were investigated, and lessons learned.

Freedom of information requests

During 2024–25, we received 130 requests under the Freedom of Information Act 2000, compared to 169 in 2023–24. Of those requests, 100% received a response within the statutory deadline. Twelve requests were subject to internal review. Four requests were further appealed to the ICO after our response. Of these requests three were not upheld by the ICO, while the fourth has been appealed to the First Tier Tribunal. On this request, the ICO disagreed with our position to neither confirm nor deny that information is held. We issued a new response withholding the information under the section 40(2) 'personal information' exemption. The requestor has again complained to the ICO and the ICO are currently considering the matter.

Internal complaints and grievances

It is important that all workers of the EHRC, including employees, contractors, Commissioners and Committee members, can raise concerns about the standards of service we provide or the behaviour of other staff in delivering that service. Our people can submit a complaint or grievance using our Dispute Resolution Policy and Procedure or by using our Anti-Bullying and Harassment Policy and procedure. Complaints and concerns against Commissioners and Committee Members are dealt with under the new 'Concerns and Complaints Policy: non-compliance with the Code of Conduct'.

During 2024–2025, we received four formal internal employee complaints, of which three are resolved, and we defended an employment tribunal claim which was withdrawn by the claimant before any hearing.

External complaints

In 2024–25 we received 20 complaints from outside the organisation, compared to 16 in 2023–24. The table below provides a summary of the outcome of these complaints.

Decision	Number of complaints
Referred to the Parliamentary and Health Service Ombudsman	1
Resolved on receipt / at first point of contact	1
Upheld	0
Partly Upheld	1
Not Upheld	8
Rejected / Withdrawn	9

Those who feel that their complaint has not been resolved after it has been through both stages of our complaints procedure can refer the matter to the Parliamentary and Health Service Ombudsman (PHSO). One complaint was referred in the period from 1 April 2024 to 31 March 2025. The PHSO did not require any further steps to be taken.

More information about our complaints policy is on [our website](#).

Internal whistleblowing

Our whistleblowing policy is available to all staff on our intranet and sets out the steps staff should take to raise their concerns about behaviours and practices at the EHRC. In 2024–25 we updated our internal whistleblowing policy. The policy is also supported by detailed guidance on the procedures to follow when raising these concerns. We also delivered training to all our staff and officers involved in internal whistleblowing processes to strengthen our approaches. There have been no whistleblowing reports in 2024–25.

External whistleblowing

As a Prescribed Whistleblowing Body, our mandate is to provide workers who are concerned that their employer is breaching equality and human rights law with a mechanism to make a disclosure to an independent body when they feel unable to disclose directly to their employer. Every disclosure is recorded, and the information disclosed is assessed to help us decide whether to look more closely at an organisation's compliance with equality and human rights law and whether to take regulatory action. Further information on whistleblowing and how we deal with concerns reported to us is on [our website](#).

Correspondence

Our correspondence function forms an integral part of the public face of the EHRC. We receive and respond to emails, letters and phone calls from individuals, organisations, MPs, parliamentarians and stakeholders requesting information, advice, legal support and regulatory action on a wide range of issues.

In 2024–25, the total number of written and phone correspondence queries we received was 4,640 and we responded to 4,449 (95%) within our target response time of twenty working days. This compares to 4,174, total correspondence queries in 2023–24, when we responded to 4,007 (96%) within the same target time of twenty working days.

Donations

We did not make any charitable or political donations in this year.

Internal control

We have a comprehensive framework of procedures and controls which cover financial and non-financial processes. This framework is regularly reviewed to ensure that it complies with all current requirements and is tested as part of the internal audit work programme. We have delivered most of our internal compliance programme during 2024–25 through which we reviewed all internal controls and implemented recommendations or updates or improvements where needed. This programme was developed and delivered with consideration of the requirements of Government Functional Standards.

As the Accounting Officer, I have responsibility for our financial affairs, subject to limits delegated to me by the Principal Accounting Officer and outlined in the Framework Document. I delegate resource and capital budgets to directors based on the receipt of a business plan for their areas of responsibility.

The scheme of delegation underpins the financial delegations contained in the Framework Document. The scheme enables budget holders to make decisions and holds them accountable for the effective management of their delegated budget, the decisions they make and the delivery of their work plan against agreed milestones. Budget holders are required to report on their performance on a monthly basis to the Leadership Team.

Performance information is subject to further periodic scrutiny and review by the Board and the ARAC. They are provided with information to enable them to function effectively. Strategic risks and issues considered by senior management are escalated to the Board, with agreed management action where appropriate.

Government functional standards

Government Functional Standards are mandated for use across government to ensure that governance and management frameworks are consistent and proportionate to the work and the level of prevailing risk.

Since the development of our internal compliance programme in 2024–25, we have used functional standards as one of the assessment measures to ensure that our policies and procedures meet both HMT's mandatory compliance requirements and our own needs as a non-departmental public body.

We monitor and systematically review all relevant Commission policies, processes and procedures to ensure their alignment with current legislation and best practice. This year, this has included important updates covering Bribery, Fraud and Anti-Corruption and Whistleblowing.

In addition, compliance programme assessment of Contract Management, Health and Safety, Accessibility, Information security and cyber security have referenced Functional Standard 2 (project delivery), 3 (human resources), 4 (property), 5 (digital), 6 (finance), 7 (security) and 13 (counter fraud) as part of our benchmarking.

Fraud

A counter-fraud policy is in operation which aligns with government requirements. Staff are always expected to act with integrity and to safeguard the public resources for which they are responsible.

There were no cases of fraud identified in 2024–25.

Conflicts of interest

The governance framework sets out the rules and guidance for Commissioners and Committee members on conflicts of interests and we maintain a publicly available register of Commissioners' interests. All appointees are required to complete a declaration and to notify the EHRC of any changes to their declaration as soon as they occur. Attendees are required to declare any potential conflicts at the beginning of meetings and individuals are required to recuse themselves from relevant items.

The staff Code of Conduct requires staff to declare all interests, including paid and unpaid external roles which may (or may be perceived to) conflict with their role in the organisation. Staff are directly contacted each year and reminded to update their declaration of interests, including stating if they have no conflicts to declare.

The Code explains the actions that staff need to take to excuse themselves from any activity where their interest may be perceived as influencing their judgement. The Code explains that it is the employee's responsibility to keep their information up to date and accurate. Declarations returned are recorded, reviewed and assessed. Staff are reminded annually about their responsibility to complete a declaration of interest return.

Auditing of accounts

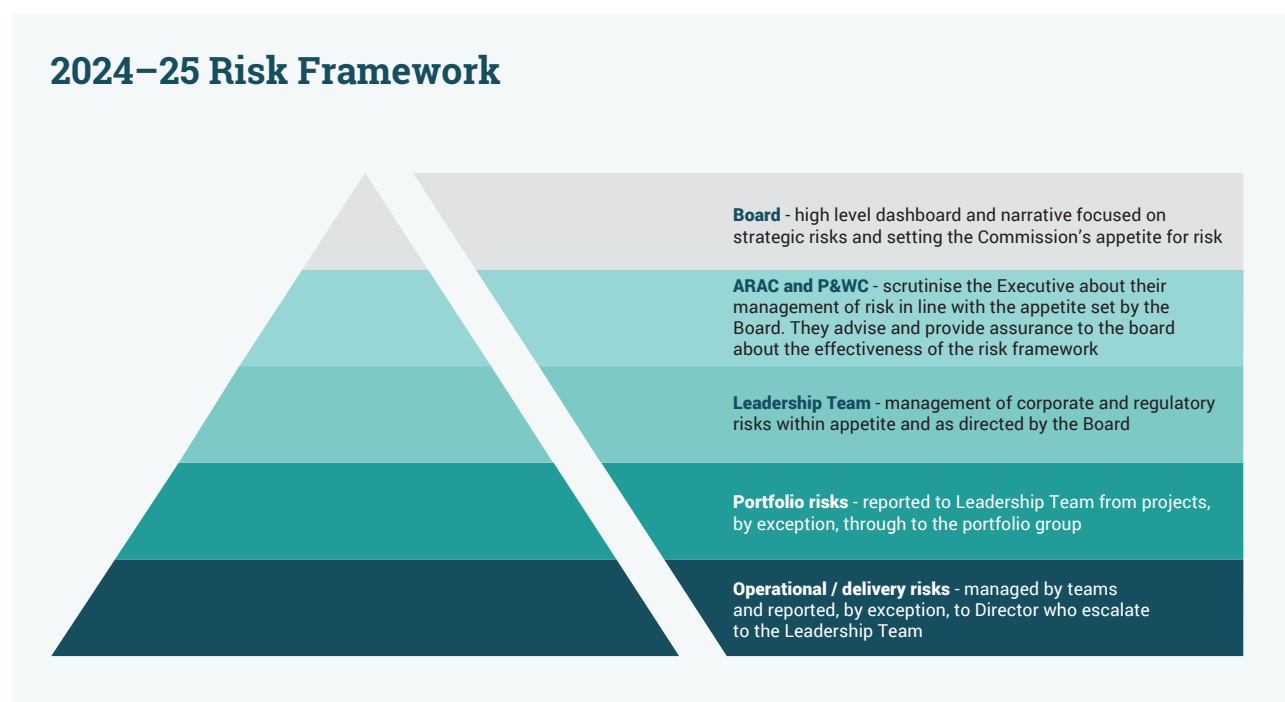
The National Audit Office carries out our external audit on behalf of the Comptroller and Auditor General.

Risk management

The EHRC manages risk at strategic, corporate and operational levels across the organisation. The Board is responsible for the oversight and management of risk at the EHRC. This includes ensuring that effective arrangements are in place to provide assurance on risk management, good governance and internal control.

The Board agrees the overall risk framework, sets the strategy and policy for the management of risk and the strategic risk appetite for the organisation. The Board also has final approval and oversight of the Corporate Risk Register. The Board receive advice about risk from the Executive, ARAC and P&WC.

The Corporate Risk Register, strategic risks and risk appetite are reviewed on an annual basis. The risk framework was also reviewed and updated in 2024–25.



The Executive manages mitigating actions for risk through the corporate risk register. Risks are managed on the basis of collective accountability with individual risks and mitigating actions identified and owned by those best placed to manage them. Risks are scored according to their likelihood and impact and review discussions take place on a monthly basis with risk owners and risks are shared with the Leadership Team each month to ensure that effective mitigations are in place. The ARAC consider risks on a quarterly basis, with P&WC also considering people and estates risks. Risk is reported to the Board at least twice a year.

The EHRC has identified seven strategic risks, which inform and are monitored through risks identified on the Corporate Risk Register. They relate to the internal and external areas of greatest concern for the ongoing delivery of our 2022–25 strategic plan and will be further considered as we implement our 2025–28 strategic plan.

The seven strategic risks are:

- **External environment** – that the EHRC is not sufficiently aware of external issues and does not feed appropriate intelligence into decision-making with a consequential impact on effectiveness and reputation.
- **Stakeholder relationships** – that the EHRC does not engage effectively with stakeholders, failing to inform, persuade or influence them appropriately and consequently losing their confidence, resulting in loss of funding, status or adverse impact on delivery.
- **Mission and strategy** – that the EHRC does not have an effective process for arriving at the right strategy and policy commensurate with its remit, with the consequence that it does not deliver what is needed to fulfil its remit.
- **Delivery** – that the EHRC does not deliver the outcomes in its strategic plan with the result that it does not fulfil its remit and suffers reputational damage.
- **People** – that the EHRC does not have people with the right skills and does not use them well, including culture, leadership, structure, skills, experience, workload, recruitment and retention.
- **Change and improvement** – that the EHRC does not recognise and manage the need for change well, resulting in poor staff engagement and lost opportunity in delivering organisational improvements.
- **Governance and compliance** – that the EHRC does not comply with all required public governance standards, protections and law, and fails to benefit from best practice standards resulting in loss of productivity or reputation.

In 2024–25 we identified and tracked a total of eleven corporate risks. No new risks were identified in year, but the wording and mitigations for our corporate risks were reviewed and updated. Key risk drivers in 2024–25 were:

- the 2024 UK General Election and subsequent change in UK Government, which resulted in a period uncertainty of policies and approaches that we might seek to advise about or challenge
- the impact of departures by senior leaders in both the Executive and the Board on the consistency and continuity of leadership
- delays in the process to recruit to vacant Board roles which rest with the EHRC's sponsor team have applied particular pressure to capacity at a Board level

- the impact of budget pressures and future budget uncertainty on our capacity, capability and ability to both plan effectively and deliver
- the design and development of our 2025–28 strategic plan, including public consultation and engagement with stakeholders who have differing views of what work we should prioritise
- in addition, the internal changes required to be able to implement our 2025–28 strategic plan are being developed and we know that changes to the organisation have the potential to drive instability in teams, particularly as we approach the threshold for changeover in plans

Much of how we mitigate risks is identified through our performance and accountability reporting. Some specific actions include:

- analysis of the King's Speech, completed by our policy and strategy teams and shared with the Executive, the Scotland and Wales committees and the Board
- ongoing discussions with the Office for Equality and Opportunity about recruitment to vacant Commissioner roles, including the Wales Commissioner role which has been vacant since November 2023, and looking to future recruitment for Commissioners who will leave the EHRC
- careful management of the budget in-year, completing work from our 2024–25 business plan and identifying new opportunities for delivery to ensure that we respond to internal and external changes
- engaging teams, the Executive, advisory Committees and the Board in development and prioritisation for the 2025–28 Strategic Plan and how we implement the approved plan
- continued investment in our tools and technology, including upgrades to onsite technology, encouraging more in-person working opportunities and support for moves to new office space in London
- continued investment in our leadership, to improve capacity and capability and investment in all levels of management across the organisation to improve skillset
- completion of a programme of review and improvement for our internal compliance and controls

Our governance and compliance controls are also tested throughout the year through the internal audit programme and informed by ongoing internal reviews. More information about our internal audit outcomes can be found on pages 99 to 100.

Accounting Officer's assurance

As Accounting Officer, I have responsibility and accountability for EHRC, its management, the efficient use of public funds and stewardship of its assets. I have responsibility for ensuring that the EHRC has systems of governance, risk management and internal control in place and I am responsible for reviewing the effectiveness of these systems.

The system of internal control reflects good practice and has been further improved over the course of 2024–25. It identifies and manages risk, rather than eliminate all risk of failure. It provides reasonable but not absolute assurance of effectiveness, supporting the achievement of our aims and objectives while safeguarding our funds and assets in line with 'Managing Public Money'. These controls have been in place throughout 2024–25 and up to the date of approval of the Annual Report and Accounts and accord with Treasury guidance.

My review of effectiveness is informed by assurances received from the Leadership Team throughout the year and from the work carried out by ARAC. It is further supported by the assurance received from internal and external audit opinions.

Assurance provided by delegated budget holders

Budget holders are required to confirm that they understand the terms of the delegation, their limits of authority and responsibilities and that they are aware of all controls in place.

Budget holders are required to complete an annual assurance statement that confirms that they have met all their obligations or made me, as Accounting Officer, aware of any instances where controls have not been met in the following areas:

- management of delegated financial resources
- managing staff performance
- risk identification and management
- audit arrangements

Budget holders are also required to make me aware of any contingent liabilities or potential claims against EHRC that have not been disclosed elsewhere. I am assured that, on review of the returns received, there is nothing of this nature that needs to be brought to the attention of the auditors.

Assurance provided by the ARAC

The ARAC provides independent oversight and review of processes and policies to give assurance that our governance arrangements are appropriate and are operating effectively. Additionally, they provide advice to the Board about these governance arrangements.

The ARAC completed its programme of work for 2024–25 and, in addition to reporting to the Board, has produced an annual report of its work for my and the Board's consideration. ARAC has not identified any additional issues requiring disclosure than those already noted in this report. Work has commenced to complete an effectiveness review of the ARAC and its operation.

The Chair of the ARAC has provided the following statement:

Our Audit and Risk Assurance Committee (ARAC) is effective. Members of the ARAC possess a range of skills and experience and have demonstrated valuable insight, scrutiny and challenge to the Accounting Officer and wider organisation. Where members of the Committee have left during the year, we have moved quickly to replace them. This is the case for both Commissioner and independent appointments.

ARAC received regular reports from management about financial performance, risk, internal compliance improvements, updates to the policy register, business continuity and internal audit. ARAC received strong assurance on the organisation's approach to information governance and received regular updates about fraud and whistleblowing with no concerns received about either.

The Committee provided effective challenge regarding improvements to the risk framework to ensure that it reflected the work of the Commission to improve its internal compliance processes. The Committee also raised concerns about the Commission's underspend for the year. There was particular challenge about ownership and accountability for policies on the register.

ARAC engaged with EHRC's internal and external auditors throughout the year. The internal audit contact with TIAA was extended for a further year until November 2025. We reviewed the internal audit plan for the coming financial year and discussed all reports received. This included considering assurance about how the Commission is responding to an audit report of limited assurance about its Health and Safety processes. We linked findings back to the corporate risk register and provided advice to functional leads, the Executive and the Board. We have received all reports from our internal audit provider within the planned timeframes.

The ARAC Chair reported to the Board at each meeting and provided assurance on matters such as risk management, governance and internal controls. ARAC is of the opinion that control systems are generally in place and have, for the most part, performed adequately. We note particular work required to improve Health and Safety processes, as supported by the outcomes of an internal audit during the year.

Over the course of 2024–25 the membership of the ARAC Committee has changed. This is due to one Commissioner and one independent member reaching the end of their term. A new independent member was recruited prior to the departure of the previous committee member and a new Commissioner was appointed to the Committee to ensure quoracy.

The interim Accounting Officer, appointed on 1 April 2024, was appointed permanently to the role in August 2024. The ARAC are satisfied that the Accounting Officer was aware of any issues and that necessary action has been taken during the year to respond to and manage them. Members of the ARAC have supported the Accounting Officer during 2024–25 in handling these issues and have offered appropriate and relevant advice to the Board.

Assurance provided by the annual internal audit opinion

Internal Audit

TIAA acted as our internal auditor during 2024–25. The internal audit plan, which is approved by the ARAC, is designed to provide independent assurance on our governance, compliance, risk management and internal controls. Audits agreed as part of the annual plan are carried out in accordance with the guidance contained in the Public Sector Internal Audit Standards. The internal auditor reports on findings, provides comparators to similar organisations and makes recommendations to management, who develop and agree an action plan to address any weaknesses identified. These action plans are monitored through a report to the ARAC at every meeting.

The audit plan for 2024–25 included 100 days of audit time. There were no changes to the internal audit plan agreed by the ARAC during the year and no additional work was carried out. A total of seven assurance reviews and one advisory review were conducted, designed to determine the extent to which the internal control system is adequate to ensure that activities and procedures are operating to achieve the EHRC's objectives.

Of the audits provided with an assurance rating, six were rated as 'substantial' assurance (compared with two in 2023–24), meaning that 'there is a robust system of internal controls operating effectively to ensure that risks are managed, and process objectives achieved' and none as 'reasonable' (compared with four in 2023–24), where 'the system of internal controls is generally adequate and operating effectively but some improvements are required to ensure that risks are managed, and process objectives achieved'.

One audit based on health and safety procedures returned a limited level of assurance (none in 2023–24). The recommendations made focused on improving documentation and records management, rather than raising concerns about direct health and safety threats to staff members. The recommendations were accepted by management and the action plan for improvements is nearly complete at the time of reporting.


The advisory report was a review of the Commission's ICT Cyber Maturity.

All the recommendations received as part of the internal audit have been reviewed by management and actions agreed. The following areas were reviewed and reported on as part of the 2024–25 plan, outcomes are also included in the table below:

System	Assurance assessment
Reset and Renewal Programme	Substantial
Role of EHRC as a Regulator	Substantial
Commissioning of Legal Work	Substantial
Governance – Strategic Planning	Substantial
Accounts Payable and Payroll (high-level)	Substantial
Budget Management	Substantial
Corporate Health and Safety (Manchester Office)	Limited
ICT – Cyber Maturity Review	Advisory

The internal auditors provide an annual report which summaries the outcomes of audits carried out during the year and provides an annual opinion. As Accounting Officer, I review the audit reports received, and the recommendations made and ensure that maintaining and improving effective governance remains a key priority for management and that any recommendations made by the internal auditors are acted upon.

This year, based on their audit work, the head of internal audit issued the following opinion:



TIAA is satisfied that, for the areas reviewed during the year, the Equality and Human Rights Commission has reasonable and effective risk management, control and governance processes in place.

EHRC Head of Internal Audit



Accounting Officer's conclusion

I have considered the evidence provided during the production and review of the Annual Governance Statement and the independent advice and assurance provided by ARAC. I am content that a good system of internal control, which was robust and fit for purpose, including the maintenance of an appropriate structure for managing risk, was in place for the year ended 31 March 2025.

Considering the assurances that I have received along with other evidence available to me, I conclude that we have satisfactory governance and risk management systems in place with effective plans to ensure continuous improvement of our control framework.

I confirm that this Annual Report and Accounts is fair, balanced and understandable. I take responsibility as Accounting Officer for the judgements made to ensure that it is fair, balanced and understandable.



John Kirkpatrick

Chief Executive and Accounting Officer

15 July 2025

Remuneration and staff report

This section provides details of the remuneration (including any non-cash remuneration) of Commissioners, independent members, the Chief Executive and Senior Directors. The content of the tables, where indicated, and the fair-pay disclosures are subject to audit.

Remuneration and staff report

Remuneration of Board members

Commissioners are appointed by the Minister for Women and Equalities, initially for a term of between two and five years and may be reappointed for one additional period.

The daily remuneration rates are set by the Minister. Board members are expected to work up to the number of days on EHRC business as prescribed in their letter of appointment.

The Chairwoman is remunerated at a rate of £500 per day and is expected to work for up to 100 days per annum (total fees £50,000 per annum). The Deputy Chair is remunerated at a rate of £450 per day and is expected to work for up to 52 days per annum (total fees £23,400 per annum). Commissioners are remunerated at a rate of £400 per day and are expected to work for up to 25 days per annum (total fees £10,000 per annum). Chairs of the Audit and Risk, People and Workplace, Public reporting, Wales and Scotland Committees are remunerated at a rate of £400 per day and are expected to work for up to 30 days per annum (total fees £12,000 per annum).

Any additional days for which fees are claimed must be approved by the Chairwoman in advance.

Fees are paid in 12 equal instalments across the year and appointments are not pensionable.

Board members do not receive any bonus payments nor benefits in kind.

Commissioners attend formal and informal meetings of the Board, support specific programmes of work and committees, represent EHRC at external events and attend training or developmental events as required.

Commissioners and Committee members can claim travel and subsistence expenses or request that travel is booked on their behalf when working on EHRC business. The expenses in the tables below show the total of out-of-pocket expenses claimed directly and the costs of travel and accommodation booked on behalf of individuals by EHRC to attend meetings. HMRC guidelines class any travel to Board meetings held at our London office as 'commuting', and any expenses claimed, or travel provided in relation to these meetings are subject to tax and National Insurance. EHRC meets the resultant tax liability for these expenses.

a) Chair & Commissioners' pay summary (the information in tables b, c, and d is subject to audit)

	2024–2025	2023–2024
	£000	£000
Board members' fees (tables b, c, and d)	142	159
Board members' employer's National Insurance contributions (NICs) (tables b, c, and d)	10	11
Statutory and advisory committee members' fees (tables e and f)	46	38
Total	198	208

The above table is a summary of emoluments disbursed. Further detail is shown in the following tables.

b) Chair

Baroness Kishwer Falkner was appointed as Chairwoman effective from 1 December 2020 for a period of four years, this period was extended until 30 November 2025 while a recruitment campaign is carried out.

	2024–2025	2023–2024
Chairwoman's fees £	50,000	50,000
Employer's NICs £	5,645	5,645
Total	55,645	55,645
Expenses and travel costs £	1,346	16,615*

* 2023–24 expenses include legal expenses of £15,793 approved by HMT.

c) Deputy Chairs

	Fees £		Expenses and travel costs £	
	2024–25	2023–24	2024–25	2023–24
Lesley Sawers Reappointed 29 March 2021 for an additional four-year term subsequently extended to 30 November 2025	23,400	11,892	5,502	3,514
Eryl Besse Appointed 16 January 2023 – resigned as deputy chair 27 September 2023	–	11,508	–	–
Alasdair Henderson Appointed 16 January 2023 – resigned as deputy chair 27 September 2023	–	11,508	–	295
Subtotal	23,400	34,908	5,502	3,809
Employer's NICs paid on fees and Expenses	2,704	3,033	–	–
Total	26,104	37,941	5,502	3,809

d) Fees and expenses for each Commissioner

	Fees £		Expenses and travel costs £	
	2024–25	2023–24	2024–25	2023–24
Jessica Butcher Appointed 1 December 2020 for an initial four-year term (ended 30 November 2024)	6,667	10,000	229	501
Baroness Joanne Cash* Appointed 16 January 2023 for an initial four-year term	12,000	11,000	485	753
David Goodhart Appointed 1 December 2020 for an initial four-year term (ended 30 November 2024)	6,667	10,000	292	263
Alasdair Henderson** Reappointed 27 April 2023 for an additional four-year term	10,667	5,082	369	110
Kunle Olulode Appointed 3 January 2023 for an initial four-year term	12,000	12,000	493	701
Akua Reindorf Appointed 20 December 2021 for an initial four-year term	10,000	10,000	104	420
Dr Lesley Sawers*** Appointed Interim Deputy Chair from 28 September 2023	–	5,901	–	2,702

* Appointed Chair of the People and Workspace Committee from 01 October 2023.

** Resumed appointment as Commissioner on 28 September 2023 following resignation as Deputy Chair.

*** Appointed Interim Deputy Chair 28 September 2023, 2023–24 fees paid after this date are shown in table C.

	Fees £		Expenses and travel costs £	
	2024–25	2023–24	2024–25	2023–24
Su-Mei Thompson**** Appointed 1 December 2020 for an initial four-year term (ended 30 November 2024)	6,667	5,833	2,938	199
Keith Richards Appointed 13 November 2024 for an initial four-year term	3,826	–	–	–
Arif Ahmed Appointed 3 January 2023 for an initial four-year term (resigned 11 August 2023)	–	3,635	–	153
Eryl Besse Appointed 01 April 2022 for an initial four-year term (resigned 31 October 2023)	–	1,099	–	–
Subtotal	68,494	74,550	4,910	5,802
Employer's NICs paid on fees and Expenses	1,475	2,109	–	–
Total	69,969	76,659	4,910	5,802

**** Su-Mei Thompson took an unremunerated leave of absence from 1 October 2023 for five months.

Expenses in the above tables include travel and subsistence costs paid for by individual Commissioners and re-claimed from EHRC as expenses in line with the expenses policy. The totals also include the cost of any travel and accommodation booked directly by the EHRC on behalf of Commissioners when they are required to travel to attend meetings or events. These costs are not reimbursed to the individual.

e. Committee fees and expenses (summary)

Committee members are remunerated at a rate of £250 per day and are expected to work 12 days per annum (total fees £3,000 per annum). Members are expected to attend Committee meetings, meet EHRC staff to support programmes or projects and to represent the EHRC at external events.

	Fees £		Expenses £	
	2024–25	2023–24	2024–25	2023–24
Scotland Committee	15,597	12,906	–	141
Wales Committee	22,750	18,854	3,284	614
Total (Scotland and Wales)	38,347	31,760	3,284	755
Employer's NICs paid	57	–	–	–

During 2024–25, the Scotland Committee consisted of five members who were in post for the whole reporting period and were paid fees of £3,000. One member joined on 19 January 2025 and received fees of £597 from this date.

During 2023–24, the Scotland Committee consisted of one member who was paid fees of £3,000 for the whole reporting period. One member's term ended on 3 January 2024. They received 9 months fees £2,250. One member resigned on 8 June 2023 and received fees of £566. One member resigned on 11 August 2023 and received fees of £1,090. Four members joined the Committee on 1 October, and each received fees of £1,500.

During 2024–25 the Wales Committee consisted of four members who were paid £3,000 each for the whole of the reporting period and two people joined the committee on 1 July 2024 and received fee from this date (£2,250 each). Due to the absence of a Wales Commissioner Martyn Jones continued to represent the committee at board meetings and received an additional allowance. The total fees paid were £6,250.

During 2023–24 the Wales Committee consisted of four members who were paid £3,000 each for the whole of the reporting period, one member whose term ended on 31 January 2024 received fees of £2,500. Following the resignation of the Wales Commissioner, Martyn Jones was allocated additional days and received fees totalling £4,354.

f. Fees and expenses for Committee independent members

ARAC and P&WC appointees receive an allowance of £250 per day and are expected to work a minimum of eight days per year (total fees £2,000). PRC appointees receive an allowance of £250 per day and are expected to work a minimum of 12 days per year (total fees £3,000).

	Fees £		Expenses £	
	2024–25	2023–24	2024–25	2023–24
Charlotte Moar (ARAC) Appointment extended until 30 September 2025	2,000	2,000	969	867
Gill Eastwood (ARAC) Appointment ended 30 September 2024	1,000	2,000	–	1,097
Reyaaz Jacobs (ARAC) Appointed 1 October 2024	1,000	–	291	–
Jonathan Parsons (P&WC) Appointment extended until 30 November 2026	2,000	2,000	–	678
David Goodhart (PRC) Appointed 1 December 2024	1,000	–	–	–
Su-Mei Thompson (PRC) Appointed 1 December 2024	1,000	–	–	–
Total	8,000	6,000	1,260	2,642
Employer's NIC	–	30	–	–

Remuneration and staff report

Staff pay and pension arrangements

Remuneration policy

The Equality Act 2006 details our authority to remunerate employees. We are responsible for the payment of any deductions from pay to the appropriate body and subject to HMT pay remit guidance when making any annual pay increases.

The reward package of senior managers (the Chief Executive and the Senior Directors) has been reviewed by the People and Workspace Committee (P&WC) annually. The Remuneration Committee, established in 2024–25, has a remit to review the reward packages of senior managers in future years.

The following section contains details of the remuneration and pension interests of senior managers.

The Chief Executive and all permanently employed directors have employment contracts which require a three-month notice period.

There are no elements of the remuneration package that are not cash.

Salary and pension entitlements of senior officers (this information is subject to audit)

The following section provides details of the salary, bonuses, pension entitlements and any taxable benefits in kind of our senior officers for the period to 31 March 2025.

Salary

Salary includes gross salary and reserved rights to any other allowance to the extent that it is subject to UK taxation.

Non-consolidated award (bonus)

Senior officer bonuses are based on performance levels achieved against agreed objectives and are subject to approval by the Remuneration committee. Bonuses are awarded on an individual basis. Executive Board members do not receive a bonus. Accrued bonus payments for the 2023–24 performance year were paid to eligible employees in 2024–25. Bonuses for 2024–25 have been accrued and will be paid during the 2025–26 financial year following approval of the distribution.

Benefits in kind

The monetary value of benefits in kind covers any benefits provided and treated by HM Revenue and Customs as a taxable emolument. No benefits in kind were paid in 2024–25, nor in 2023–24.

Remuneration (salary, bonuses, benefits in kind and pensions) – this information has been subject to audit

Single total figure of remuneration					
	Salary £000 (bands of £5,000)	Bonus £000 (bands of £5,000)	Benefits in kind (rounded to nearest £100)	Pension Benefits £000 (to the nearest £1,000)	Total £000 (bands of £5,000)
John Kirkpatrick*, Interim Chief Executive (01 April 2024 to 22 August 2024), Chief Executive (from 23 August 2024)					
2024–25	140–145	–	–	119	255–260
2023–24	45–50 FYE 105–110	–	–	87	135–140
Penny Hobman, Deputy Chief Executive joined 27 January 2025					
2024–25	20–25 FYE 110–115	–	–	11	30–35
2023–24	–	–	–	–	–

*John Kirkpatrick joined the EHRC on 17 October 2023 in the role of Deputy Chief Executive.

Single total figure of remuneration					
	Salary £000 (bands of £5,000)	Bonus £000 (bands of £5,000)	Benefits in kind (rounded to nearest £100)	Pension Benefits £000 (to the nearest £1,000)	Total £000 (bands of £5,000)
Cath Denholm, Acting Chief Executive from 13 October 2023 – 31 March 2024 then Chief Operating Officer until 30 June 2024 when Cath left the EHRC					
2024–25	25–30 FYE 105–110	–	–	10	35–40
2023–24	115–120 To 1 Oct FYE 100–105 from 2 Oct FYE 130–135	0–5	–	46	165–170
Marcial Boo, Chief Executive (resigned 02 January 2024)					
2024–25	–	–	–	–	–
2023–24	95–100 FYE 130–135	–	–	52	145–150
Melanie Field, Chief Strategy and Policy Officer (resigned 31 October 2023)					
2024–25	–	–	–	–	–
2023–24	60–65 FYE 100–105	0–5	–	75	135–140
Jacqueline Killeen, Chief Regulator (secondment ended 30 June 2023)					
2024–25	–	–	–	–	–
2023–24	20–25 FYE 90–95	–	–	16	35–40

Pay multiples (this information has been subject to audit)

Reporting bodies are required to disclose the relationship between the remuneration of the highest-paid director in their organisation and the median remuneration of the organisation's workforce.

Total remuneration includes salary and allowances, non-consolidated performance-related pay and benefits in kind. It does not include severance payments, employer pension contributions or the cash equivalent transfer value (CETV) of pensions.

Full-time equivalent (FTE) is defined as actual hours worked as a proportion of a full working week (36 hours).

For the purposes of calculating the pay ratio, we have estimated the annual remuneration paid to interim staff, as this information is not available. The calculation is based on an estimate on 222 working days at the interim's agency day rate (excluding VAT) less 20% to cover agency fees and employer's NICs.

	2024-25	2023-24	2024-25	2023-24
	Including bonus payments*	Including bonus payments*	Excluding bonus payments*	Excluding bonus payments*
Banded remuneration of the highest-paid director £	140,000 – 145,000	130,000 – 135,000	140,000 – 145,000	130,000 – 135,000
First quartile of pay £	44,530	42,228	44,509	42,228
First quartile ratio %	3.20	3.14	3.20	3.14
Median total remuneration £	44,784	43,728	44,509	42,228
Median pay ratio %	3.18	3.03	3.204	3.14
Third quartile of pay £	56,182	55,000	55,907	53,500
Third quartile ratio %	2.54	2.41	2.55	2.48
Range of banded remuneration for employees £	25,000 – 30,000 to 140,000 – 145,000	25,000 – 30,000 to 130,000 – 135,000	25,000 – 30,000 to 140,000 – 145,000	25,000 – 30,000 to 130,000 – 135,000

*No benefits in kind were received by any member of staff in either year.
No bonuses were paid to the highest paid director in either year.

The banded remuneration of the highest-paid director in the financial year 2024–25 was £140,000 – £145,000 (2023–24: £130,000 to £135,000) including bonus payments. The highest paid director in the financial year was the Chief Executive. This was:

- 3.20 times (2023–24, 3.14 times) **the first quartile** of remuneration, which was £44,530 (2023–24 £42,228)
- 3.18 times (2023–24, 3.03 times) **the median** remuneration of the workforce, which was £44,784 (2023–24, £43,728)
- 2.54 times (2023–24 2.41 times) **the third quartile** of remuneration, which was £56,182 (2023–24, £55,000)

In 2024–25 no employee, (2023–24, none) received remuneration in excess of that received by the highest paid director.

On an annualised basis, one temporary agency member of staff (the interim Finance Director, appointed from 3 March 2025 for a four-month term) and using a calculation based on the agreed rate multiplied by 222 working days would receive payment in excess of the Highest Paid Director. This appointment has been excluded from the above calculations as the temporary nature of the appointment would distort the ratios and make the data incomparable year on year.

Change in total remuneration

	2024–25	2023–24	Change	% Change
Average pay including bonuses £	50,606	49,815	791	1.59
Average pay excluding bonuses £	50,352	48,568	1,784	3.67
Average bonus payment £	255	1,218	(963)	(79)
No of employees receiving a bonus	182	186	(4)	(2)

Average remuneration for all staff excluding bonuses increased by 4.76 per cent. This increase is attributed to a combination of the pay award (average of 5%) and a change in the grade mix of the workforce.

The average bonus payment has reduced along with the number of recipients, mainly due to the effect of the cost of living payment on 2023–24. There are ongoing negotiations regarding bonus payments for the 2024–25 performance year.

Pension benefits – this information has been subject to audit

Accrued pension at pension age as at 31 March 2025 and related lump sum (bands of £5,000)	Real increase in pension and related lump sum at pension age (bands of £2,500)	CETV at 31 March 2025 £000	CETV at 31 March 2024 £000	Real increase in CETV £000
John Kirkpatrick, Chief Executive				
75–80	5–7.5	1,630	1,455	112
Penny Hobman, Deputy Chief Executive				
35–40 plus a lump sum of 45–50	0 – 2.5 plus a lump sum of 0 – 2.5	661	651	8
Cath Denholm – Chief Operating Officer (resigned 30 June 2024)				
10–15	0–2.5	162	147	7

Civil Service pensions

Pension benefits are provided through the Civil Service pension arrangements. Before 1 April 2015, the only scheme was the Principal Civil Service Pension Scheme (PCSPS), which is divided into a few different sections. Classic, premium and classic plus provide benefits on a final salary basis, while nuvos provides benefits on a career average basis. From 1 April 2015 a new pension scheme for civil servants was introduced: the Civil Servants and Others Pension Scheme or alpha, which provides benefits on a career average basis. All newly appointed civil servants, and the majority of those already in service, joined the new scheme.

The PCSPS and alpha are unfunded statutory schemes. Employees and employers make contributions (employee contributions range between 4.6% and 8.05%, depending on salary). The balance of the cost of benefits in payment is met by monies voted by Parliament each year. Pensions in payment are increased annually in line with the Pensions Increase legislation. Instead of the defined benefit arrangements, employees may opt for a defined contribution pension with an employer contribution, the partnership pension account.

In alpha, pension builds up at a rate of 2.32% of pensionable earnings each year, and the total amount accrued is adjusted annually in line with a rate set by HM Treasury. Members may opt to give up (commute) pension for a lump sum up to the limits set by the Finance Act 2004. All members who switched to alpha from the PCSPS had their PCSPS benefits 'banked'. Those with earlier benefits in one of the final salary sections of the PCSPS have those benefits based on their final salary when they leave alpha.

The accrued pensions shown in this report are the pension the member is entitled to receive when they reach normal pension age, or immediately on ceasing to be an active member of the scheme if they are already at or over normal pension age. Normal pension age is 60 for members of classic, premium and classic plus, 65 for members of nuvos, and the higher of 65 or State Pension Age for members of alpha. The pension figures in this report show pension earned in PCSPS or alpha, as appropriate. Where a member has benefits in both the PCSPS and alpha, the figures show the combined value of their benefits in the two schemes but note that the constituent parts of that pension may be payable from different ages.

When the Government introduced new public service pension schemes in 2015, there were transitional arrangements which treated existing scheme members differently based on their age. Older members of the PCSPS remained in that scheme, rather than moving to alpha. In 2018, the Court of Appeal found that the transitional arrangements in the public service pension schemes unlawfully discriminated against younger members.

As a result, steps are being taken to remedy those 2015 reforms, making the pension scheme provisions fair to all members. The public service pensions remedy is made up of two parts. The first part closed the PCSPS on 31 March 2023, with all active members becoming members of alpha from 1 April 2023. The second part removes the age discrimination for the remedy period, between 1 April 2015 and 31 March 2023, by moving the membership of eligible members during this period back into the PCSPS on 1 October 2023. This is known as 'rollback'.

For members who are in scope of the public service pension remedy, the calculation of their benefits for the purpose of calculating their Cash Equivalent Transfer Value and their single total figure of remuneration, as of 31 March 2024 and 31 March 2025, reflects the fact that membership between 1 April 2015 and 31 March 2023 has been rolled back into the PCSPS. Although members will in due course get an option to decide whether that period should count towards PCSPS or alpha benefits, the figures show the rolled back position (PCSPS benefits) for that period.

The partnership pension account is an occupational defined contribution pension arrangement which is part of the Legal & General Mastertrust. The employer makes a basic contribution of between 8% and 14.75% (depending on the age of the member). The employee does not have to contribute but, where they do make contributions, the employer will match these up to a limit of 3% of pensionable salary (in addition to the employer's basic contribution). Employers also contribute a further 0.5% of pensionable salary to cover the cost of centrally provided risk benefit cover (death in service and ill health retirement).

Further details about pension arrangements are on the [Civil Service Pension Scheme](#) website.

The cash equivalent transfer value

A Cash Equivalent Transfer Value (CETV) is the actuarially assessed capitalised value of the pension scheme benefits accrued by a member at a particular point in time.

The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the scheme. A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and chooses to transfer the benefits accrued in their former scheme. The pension figures shown relate to the benefits that the individual has accrued as a consequence of their total membership of the pension scheme, not just their service in a senior capacity to which disclosure applies.

The figures include the value of any pension benefit in another scheme or arrangement which the member has transferred to the Civil Service pension arrangements. They also include any additional pension benefit accrued to the member as a result of their buying additional pension benefits at their own cost. CETVs are calculated in accordance with The Occupational Pension Schemes (Transfer Values) (Amendment) Regulations 2008 and do not take account of any actual or potential reduction to benefits resulting from Lifetime Allowance Tax which may be due when pension benefits are taken.

The real increase in the CETV

This reflects the increase in CETV that is funded by the employer. It does not include the increase in accrued pension due to inflation, contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement) and uses common market valuation factors for the start and end of the period.

Civil Service and other compensation schemes: exit packages (this information is subject to audit)

Exit package cost band	Compulsory Redundancies	Other agreed departures	Total number of Exit packages by cost band
£50,000-£100,000	–	1	1
Total number of exit packages	–	1	1
Total resource cost (£)	–	–	95,000

During 2024–25 one exit package was paid in the band £50,000-£100,000 (none in 2023–24).

Redundancy and other departure costs have been paid in accordance with the provisions of the Civil Service Compensation Scheme (CSCS), a statutory scheme made under the Superannuation Act 1972. The table above shows the total cost of exit packages agreed and accounted for in 2024–25 (£95,000); (2023–24 nil).

Tax arrangements of public sector appointees

In accordance with HM Treasury guidance on disclosure, the following tables set out the number of interim staff and the assurances given about tax status.

Highly paid off-payroll worker engagements as at 31 March 2025, earning £245 per day or greater.	
No. of engagements as of 31 March 2025 Both existed for less than three months	2

2023–24: there were no existing engagements as at 31 March 2024 which were over 6 months.

Highly paid off-payroll worker engagements as at 31 March 2025, earning £245 per day or greater.	
Number of off-payroll workers engaged during the year ended 31 March 2025	2
Of which:	
Not subject to off-payroll legislation	–
Subject to off-payroll legislation and determined as in-scope of IR35	2
Subject to off-payroll legislation and determined as out-of-scope of IR35	–
Engagements reassessed for compliance or assurance purposes	–
Engagements that saw a change to IR35 status following review	–

Between 1 April 2024 and 31 March 2025 the number of engagements, that met the above criteria was 2.

Off-payroll engagements of Board members or senior officials with significant financial responsibility, between 1 April 2024 and 31 March 2025

Number of off-payroll engagements of Board members or senior officials with significant financial responsibility, during the financial year	–
Total number of individuals on payroll and off-payroll who have been deemed 'Board members or senior officials with significant financial responsibility', during the financial year. This figure includes both payroll and off-payroll engagements.	13

2023–24: there were no off-payroll board members, the total number of Board members who served during the year was 17.

Remuneration and staff report

Staff report

Staff numbers and related cost (average staff numbers and staff costs are subject to audit).

Staff numbers

The number of staff we employed on 31 March 2025 is as follows:

	2024–2025		
	Female	Male	Total
Directors (SCS Grade 1–3 equivalent)	4	3	7
Other employees	120	60	180
Other employees (short-term workers)	8	3	11
Other employees (seconded / loans inwards)	2	–	2
Total	134	66	200
Interims and support workers	5	1	6
Other employees (seconded / loans outwards)	–	–	–

At 31 March 2025, 200 individuals were directly employed by the EHRC on a permanent or fixed-term basis (compared with 216 on 31 March 2024). Six interim staff were engaged on 31 March 2025. Two employees were seconded to the EHRC from other government departments and there were no employees seconded or loaned out on 31 March 2025.

	2024–2025	2023–2024
Permanently employed staff	179	195
Other		
Short-term contract staff	11	13
Inward secondments	2	3
Agency staff (contracted staff)	1	1
Total	193	212

The average number of FTE employees engaged during the year 2024–25 was 193 (212 in 2023–24), including seconded, loan or agency staff.

Staff costs (subject to audit)

	2024–2025 Permanently employed staff	2024–2025 Others (agency and FTC)	2024–2025 Total	2023–2024 Total
	£000	£000	£000	£000
Wages and salaries	9,347	367	9,714	10,556
Social security costs	1,039	41	1,080	1,167
Apprenticeship levy	35	–	35	39
Pension costs*	2,695	106	2,801	2,826
Untaken annual leave**	(34)	–	(34)	(22)
Inward secondments	–	–	–	40
Total staff costs	13,082	514	13,596	14,606
Recoveries in respect of (outward) secondments***	(50)	–	(50)	(169)
Total staff costs (net of amounts recovered)	13,032	514	13,546	14,437
Interim costs	–	81	81	43
Total	13,032	595	13,627	14,480

* Pension costs include Civil service pension scheme costs; 2024–25 £2,791k (£2,811k 2023–24) and partnership scheme costs; 2024–25 £10k (£15k 2023–24)

** Untaken annual leave represents the movement in the accrual based on the calculated cost of leave not taken at 31 March 2025

*** Represents outward secondments during the reporting period where the employee remains on EHRC's payroll and costs are recovered

Sickness absence

The sickness absence rate for staff increased compared to 2023–24 and is shown in the table below as average working days lost (AWDL) per person. This rise is primarily due to longer durations of long-term absence among a small number of employees, along with an increase in mental health-related absences.

	AWDL
2024–25 (as at 31 March 25)	8.3
2023–24 (as at 31 March 24)	7.9

Staff turnover

During 2024–25, employee turnover remained broadly consistent with the previous year. On 31 March 2025, voluntary employee turnover was 13.1%, a decrease from 13.8% on 31 March 2024. We continue to offer confidential exit interviews to leavers to gain insight into how we can improve our working environment, culture and relationships.

Employee engagement

Year	Employee Engagement Index
2024	52.5%
2023	—*
2022	53.4%

* We conducted a number of mini-surveys across the year and did not run a full survey, consequently an engagement score was not calculated.

We are committed to fostering a culture of open communication, transparency and continuous improvement. To understand the experiences of our people and how it feels to work at the Commission, we ran our annual People Survey, achieving an 82% (163) response rate. This demonstrates strong engagement from our workforce and valuable insights into employee engagement, satisfaction and areas for improvement. The quantitative and qualitative feedback will drive our strategic workforce initiatives, and we will work collaboratively to make improvements where needed.

Following a series of informal in person focus groups between our senior leaders and colleagues in 2023–24, we committed to finding more opportunities to have open and explorative conversations. Building on these discussions, we delivered interactive workshops on Building Positive Workplaces, providing opportunity for self-reflection and connection with colleagues. The workshops focused on boosting engagement, strengthening relationships and enhancing communication skills.

We also have a Staff Forum that typically meets every two months. This provides a dedicated space for colleagues across the Commission to engage with and feedback on matters affecting the wider workforce.

We recognise and actively engage with the Public and Commercial Services (PCS) and Unite trade unions. We also operate a formal Health and Safety Committee to ensure a healthy and safe working environment with representation from both management and trade unions.

Health and Safety

The health, safety and wellbeing (H&S) of our staff, visitors and contractors working on our premises is of paramount importance. We have a well-established health and safety policy and a functioning H&S Committee (which includes representation from recognised Trade Unions). We aim to manage reasonably foreseeable risks and implement any lessons learned from incidents to prevent recurrences. We recognise our moral, legal and financial responsibilities under the Health and Safety at Work etc. Act 1974 (the 'Act') and other applicable legislation. We aim create a positive culture of H&S awareness and incident reporting to support the continual review of control measures and to mitigate risks.

During 2024–25 and in response to audit recommendations, we commenced a programme of health and safety improvements to ensure that our policies, processes and procedures are aligned to our current ways of working. This included a detailed review of incident reporting and investigation procedures and additional investment in staff training and development. In total for 2024–25 we recorded 14 health and safety events, comprising 4 reports of safety concerns, 1 near miss, 1 accident and 8 incidents.

Recruitment practices

Recruitment activity decreased during 2024–25, primarily due to a reduction in employee turnover and proactive measures taken to ensure that our workforce remains both cost-effective and aligned with organisational needs. We continued to strengthen our internal processes, with ongoing improvements to our induction and onboarding procedures.

The use of agency workers was limited to a small number of short-term engagements in the final quarter of the year. We also reduced our use of executive search agencies for senior recruitment, reflecting our commitment to developing internal capability and driving cost efficiencies in recruitment.

As a Disability Confident Leader, we are committed to inclusive recruitment practices. We operate a guaranteed interview scheme for disabled applicants who meet the minimum criteria with requested reasonable adjustments made at all stages of the process and we use recruitment software to anonymise applications to ensure fairness.

Facility time

The Trade Union (Facility Time Publication Requirements) Regulations 2017 came into force on 1 April 2017 and require relevant public sector employers to 'collate and publish, on an annual basis, a range of data on the amount and cost of facility time within their organisation'.

Facility time is defined in the regulations as 'the provision of paid or unpaid time from an employee's normal role to undertake Trade Union duties and activities as a Trade Union representative'. The tables below show the amount and cost of facility time for 2024–25.

The number of employees who were relevant union officials between 1 April 2024 and 31 March 2025 and their FTE based on their contractual hours as a proportion of a standard working week (36 hours).

Relevant union officials	2024–25
Number of employees who were relevant union representatives during the relevant period	19
FTE employee number	18.29

For employees who were relevant union officials between 1 April 2024 and 31 March 2025, the percentage of their working hours spent on facility time.

Percentage of time spent on facility time				
Percentage of time	Less than 1	1 – 50	51 – 99	100
Number of employees	9	10	0	0

Employees who were relevant union officials employed between 1 April 2024 and 31 March 2025, percentage of pay bill spent on facility time.

Percentage of pay bill spent on facility time	
The total paid to trade union officials whilst carrying out facility time activities or duties (£000)	37
The total 2024–25 staff pay bill (£000)	13,546
The percentage of total pay bill spend on facility time %	0.27

The regulations require organisations to publish how many hours were spent by trade union officials on paid trade union activities as a percentage of total paid facility time hours. Facility time is paid or unpaid time that trade union officials receive from their normal role to undertake trade union duties and activities.

Paid trade union duties include, for example, preparing for negotiation or consultation and attending meetings, accompanying their trade union members to meetings and completing training relevant to their trade union role.

Paid trade union activities are defined as the time taken off with pay by trade union officials to carry out matters beyond the immediate interest or concern of EHRC. These activities include attendance at national executive committee meetings and attendance at trade union conferences.

Employees who were relevant union officials between 1 April 2024 and 31 March 2025 spent 1,106 hours on all union activities, of these 486 (43.9 percent) were classed as carrying out paid trade union activities.

Paid trade union activities	%
Time spent on paid trade union activities as a percentage of total paid facility time hours	43.9

Expenditure on consultancy

Consultancy spend during 2024–25 totalled £7,842 and related to the completion of an independent review into our governance arrangements. Spend in this category was £22,900 in 2023–24.

People policies

A comprehensive suite of policies and procedures support colleagues throughout their time at work. Our policies and procedures are designed to be inclusive for everyone working at the Commission, promoting reasonable adjustments, flexible working and fostering an inclusive workplace culture.

In May 2024, we updated our hybrid working principles to better support colleagues in balancing office and remote work, while enhancing both performance and collaboration.

In January 2025, we introduced an improved Whistleblowing policy and appointed and trained key role holders, including Nominated Officers, Investigators and a Non-Executive Whistleblowing Champion from our Board of Commissioners. We are committed to fostering a transparent, accountable and respectful culture, where speaking up is both encouraged and valued. Our revised Whistleblowing policy reflects this and includes additional reporting mechanisms, a process for reporting concerns anonymously and supports early resolution. By addressing concerns early, we protect whistleblowers, uphold the Commission's reputation, and ensure fairness across the organisation.

The Worker Protection (Amendment of Equality Act 2010) Act 2023 introduced a new duty requiring employers to take reasonable steps to prevent the sexual harassment of employees. In 2024–25, we:

- conducted a comprehensive risk assessment, informed by workforce data and focus groups with our employees, to better understand potential risk factors for sexual harassment in our workplace and to identify preventative steps
- developed a new sexual harassment policy and associated action plan, reflecting our zero-tolerance approach to sexual harassment in our workplace
- provided sexual harassment in the workplace training to all colleagues and managers, and embedded the learning into our induction programme for future joiners
- appointed a non-executive Sexual Harassment Champion, to oversee our approach and provide assurance to the Board

We submit an annual policy compliance report to the Audit and Risk Assurance Committee (ARAC) and People and Workspaces Committee (P&WC). Colleagues are reminded of our essential workplace policies and procedures on a cycle basis, with self-declarations and short knowledge questionnaires used to ensure compliance.

Diversity and inclusion

We promote diversity and inclusion for all. Over the past year we have maintained a high representation across most of our protected characteristics this year. We encourage staff to declare these characteristics to ensure we have an accurate picture of our workforce. As we have a relatively small workforce, a low number of starters or leavers can significantly change our workforce profile.

In 2024–25 we worked in partnership with our staff networks and Staff Forum to further improve our employee experience; for example, working together to encourage declaration of protected characteristics in the 2024–25 People Survey.

Ensuring workplace accessibility for everyone is a priority for us. In 2024–25, our accessibility working group supported teams to ensure that our digital content was inclusive for all colleagues. We were reaccredited as a Disability Confident Leader, following a rigorous review of our relevant policies, practices and key initiatives. This recognises the extensive work we carried out to embed an inclusive culture and support disabled colleagues and candidates. We provided training in deaf awareness, neurodiversity in the workplace and menopause awareness, aimed at supporting inclusion.

We also remained actively engaged with the Civil Service Fast Stream internship programme. In 2024–25, we hosted two individuals on an 8-week internship, providing valuable work experience.

Health and wellbeing

In 2024–25, we offered all colleagues not eligible through the NHS, an influenza vaccination. A range of wellbeing activities supported colleagues through the winter months, including mental health awareness and resilience training, physical health checks and wellbeing coaching.

We continued to provide colleagues with access to a fully comprehensive Employee Assistance Programme and Occupational Health Advisor, as well as support from our internal Mental Health Supporters, Wellbeing Staff Network, and the Civil Service Charity Commission.

To further support our menopause in the workplace policy, introduced in 2023–24, we appointed a Menopause Champion and delivered a lunchtime learning session on the impact of menopause in the workplace, aiming to raise awareness and provide support for individuals experiencing menopause symptoms at work.

Learning and Development

All colleagues have access to a range of learning and development opportunities and agree personal development objectives with their line managers. In 2024–25, we continued our commitment to building leadership and management capability. This included the continuation of our leadership development series to strengthen leadership skills and build a diverse talent pipeline for senior roles. We also launched aspiring managers learning modules for colleagues looking to take on managerial responsibilities.

We supported senior leaders through executive development and the Senior Principal Development Series. Several Directors and Senior Principals also undertook coaching and 360-degree feedback to inform their ongoing development. Building on this foundation, we have designed a revised Management Development Programme for existing line managers, aligned with Civil Service Line Management Standards and tailored to our organisational needs.

We have delivered a wide range of training courses including workshops on absence management, preventing sexual harassment, neurodiversity in the workplace, building positive workplace culture, and writing for impact. In addition, we delivered specialist training to strengthen our capacity to support staff, including whistleblowing, conducting investigations, and mental health first aid.

Pensions

The PCSPS is an unfunded multi-employer defined benefit scheme in which the EHRC is unable to identify its share of the underlying assets and liabilities. A full actuarial valuation was carried out as at 31 March 2020. Details can be found in the resource accounts of the Cabinet Office: Civil Superannuation (www.civilservicepensionscheme.org.uk/about-us/scheme-valuations).

In 2024–25, employers' contributions of £2,791,287 were payable to the PCSPS (2023–24: £2,810,565) at one of four rates in the range 26.6% to 30.3% (2023–24: 26.6%–30.3%) of pensionable pay, based on salary bands. The scheme actuary reviews employer contributions every four years following a full scheme valuation. The salary bands and contribution rates were revised for 1 April 2019 – 31 March 2024 and remained unchanged in 2024–25. The contribution rates reflect benefits as they are accrued, not when the costs are actually incurred, and reflect past experience of the scheme. Contributions due to the PCSPS at the reporting period date were £270,325.

Employees can opt to open a partnership pension account, a stakeholder pension with an employer contribution. Employers' contributions of £10,459 (2023–24 £14,990) were paid to an appointed stakeholder pension provider. Employer contributions are age-related and range from 8.0 to 14.75 per cent (2023–24: 8.0 to 14.75 per cent) of pensionable pay. Employers also match employee contributions up to 3 per cent of pensionable pay. In addition, employer contributions of £539; 0.5 per cent (2023–24: £587; 0.5 per cent) of pensionable pay, were payable to the PCSPS to cover the cost of the future provision of lump sum benefits on death in service and ill health retirement of these employees. Contributions due to the partnership pension providers at the reporting period date were £4,744. Contributions prepaid at that date were nil.

There were no early retirements on ill-health grounds (nor any in 2023–24).

Parliamentary accountability and audit report

This section summarises the key parliamentary accountability statements within the annual report and accounts and contains the certificate and report of the Comptroller and Auditor General to the Houses of Parliament.

Parliamentary accountability and audit report

Parliamentary disclosures – all disclosures are subject to audit

Losses and special payments

'Managing Public Money' and the Financial Reporting Manual (FReM) require a statement showing losses and special payments by value and by type to be shown separately where they exceed £300,000 in total, and those individually that exceed £300,000.

There were no losses or special payments in 2024–25 that require disclosure in the Annual Report and Accounts (none in 2023–24).

Remote contingent liabilities

A remote contingent liability exists where the likelihood of settlement is too remote to meet the definition of a contingent liability.

There are no remote contingent liabilities as at 31 March 2025 (none at 31 March 2024).

Fees and charges

The EHRC does not have the power to raise income through the levy of fees or charges.

Regularity of expenditure

All expenditure in 2024–25 has been carried out in accordance with relevant legislation, the delegated authority given to the Accounting Officer by the sponsor department and the relevant EHRC policies.



John Kirkpatrick

Chief Executive and Accounting Officer

15 July 2025

Parliamentary accountability and audit report

**Certificate and Report of the
Comptroller and Auditor General
to the Houses of Parliament**

Opinion on financial statements

I certify that I have audited the financial statements of the Commission for Equality and Human Rights (trading as the Equality and Human Rights Commission) for the year ended 31 March 2025 under the Equality Act 2006.

The financial statements comprise the Equality and Human Rights Commission's

- Statement of Financial Position as at 31 March 2025;
- Statement of Comprehensive Net Expenditure, Statement of Cash Flows and Statement of Changes in Taxpayers' Equity for the year then ended; and
- the related notes including the significant accounting policies.

The financial reporting framework that has been applied in the preparation of the financial statements is applicable law and UK-adopted International Accounting Standards.

In my opinion, the financial statements:

- give a true and fair view of the state of the Equality and Human Rights Commission's affairs as at 31 March 2025 and its net expenditure for the year then ended; and
- have been properly prepared in accordance with the Equality Act 2006 and Secretary of State directions issued thereunder.

Opinion on regularity

In my opinion, in all material respects, the income and expenditure recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

Basis for opinions

I conducted my audit in accordance with International Standards on Auditing (UK) (ISAs UK), applicable law and Practice Note 10 *Audit of Financial Statements and Regularity of Public Sector Bodies in the United Kingdom (2022)*. My responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the financial statements* section of my certificate.

Those standards require me and my staff to comply with the Financial Reporting Council's *Revised Ethical Standard 2024*. I am independent of the Equality and Human Rights Commission in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK. My staff and I have fulfilled our other ethical responsibilities in accordance with these requirements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern

In auditing the financial statements, I have concluded that the Equality and Human Rights Commission's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Equality and Human Rights Commission's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities of the Accounting Officer with respect to going concern are described in the relevant sections of this certificate.

The going concern basis of accounting for the Equality and Human Rights Commission is adopted in consideration of the requirements set out in HM Treasury's Government Financial Reporting Manual, which requires entities to adopt the going concern basis of accounting in the preparation of the financial statements where it is anticipated that the services which they provide will continue into the future.

Other Information

The other information comprises information included in the Annual Report, but does not include the financial statements and my auditor's certificate and report thereon. The Accounting Officer is responsible for the other information.

My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my certificate, I do not express any form of assurance conclusion thereon.

My responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit, or otherwise appears to be materially misstated.

If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.

Opinion on other matters

In my opinion the part of the Remuneration and Staff Report to be audited has been properly prepared in accordance with Secretary of State directions issued under the Equality Act 2006.

In my opinion, based on the work undertaken in the course of the audit:

- the parts of the Accountability Report subject to audit have been properly prepared in accordance with Secretary of State directions made under the Equality Act 2006; and
- the information given in the Performance Report and the Accountability Report for the financial year for which the financial statements are prepared is consistent with the financial statements and is in accordance with the applicable legal requirements.

Matters on which I report by exception

In the light of the knowledge and understanding of the Equality and Human Rights Commission and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance Report and the Accountability Report.

I have nothing to report in respect of the following matters which I report to you if, in my opinion:

- adequate accounting records have not been kept by the Equality and Human Rights Commission or returns adequate for my audit have not been received from branches not visited by my staff; or
- I have not received all of the information and explanations I require for my audit; or
- the financial statements and the parts of the Accountability Report subject to audit are not in agreement with the accounting records and returns; or
- certain disclosures of remuneration specified by HM Treasury's Government Financial Reporting Manual have not been made or parts of the Remuneration and Staff Report to be audited is not in agreement with the accounting records and returns; or
- the Governance Statement does not reflect compliance with HM Treasury's guidance.

Responsibilities of the Commission and Accounting Officer for the financial statements

As explained more fully in the Statement of Accounting Officer's Responsibilities, the Equality and Human Rights Commission and Accounting Officer are responsible for:

- maintaining proper accounting records;
- providing the C&AG with access to all information of which management is aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
- providing the C&AG with additional information and explanations needed for his audit;
- providing the C&AG with unrestricted access to persons within the Equality and Human Rights Commission from whom the auditor determines it necessary to obtain audit evidence;

- ensuring such internal controls are in place as deemed necessary to enable the preparation of financial statements to be free from material misstatement, whether due to fraud or error;
- preparing financial statements which give a true and fair view in accordance with Secretary of State directions issued under the Equality Act 2006;
- preparing the annual report, which includes the Remuneration and Staff Report, in accordance with Secretary of State directions issued under the Equality Act 2006; and
- assessing the Equality and Human Rights Commission's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Accounting Officer anticipates that the services provided by the Equality and Human Rights Commission will not continue to be provided in the future.

Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit, certify and report on the financial statements in accordance with the Equality Act 2006.

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a certificate that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Extent to which the audit was considered capable of detecting non-compliance with laws and regulations including fraud

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of non-compliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting non-compliance with laws and regulations, including fraud is detailed below.

Identifying and assessing potential risks related to non-compliance with laws and regulations, including fraud

In identifying and assessing risks of material misstatement in respect of non-compliance with laws and regulations, including fraud, I:

- considered the nature of the sector, control environment and operational performance including the design of the Equality and Human Rights Commission's accounting policies.
- inquired of management, the Equality and Human Rights Commission's head of internal audit and those charged with governance, including obtaining and reviewing supporting documentation relating to the Equality and Human Rights Commission's policies and procedures on:
 - identifying, evaluating and complying with laws and regulations;
 - detecting and responding to the risks of fraud; and
 - the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations including the Equality and Human Rights Commission's controls relating to the Equality and Human Rights Commission's compliance with the Equality Act 2006 and Managing Public Money;
- inquired of management, the Equality and Human Rights Commission's head of internal audit and those charged with governance whether:
 - they were aware of any instances of non-compliance with laws and regulations;
 - they had knowledge of any actual, suspected, or alleged fraud;
- discussed with the engagement team and the relevant external specialists, including pensions experts regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, I considered the opportunities and incentives that may exist within the Equality and Human Rights Commission for fraud and identified the greatest potential for fraud in the following areas: revenue recognition, posting of unusual journals, complex transactions and bias in management estimates. In common with all audits under ISAs (UK), I am required to perform specific procedures to respond to the risk of management override.

I obtained an understanding of the Equality and Human Rights Commission's framework of authority and other legal and regulatory frameworks in which the Equality and Human Rights Commission operates. I focused on those laws and regulations that had a direct effect on material amounts and disclosures in the financial statements or that had a fundamental effect on the operations of the Equality and Human Rights Commission. The key laws and regulations I considered in this context included Equality Act 2006, Managing Public Money, employment law, pensions legislation and tax legislation.

I considered other risk assessment procedures performed relating to fraud, non-compliance with laws and regulations and regularity including attending the Audit and Risk Assurance Committee; analytical procedures to identify any significant and unusual transactions; and review of the design and implementation of controls related to the processing of journals.

Audit response to identified risk

To respond to the identified risks resulting from the above procedures:

- I reviewed the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described above as having direct effect on the financial statements;
- I enquired of management, the Audit, Risk Assurance Committee and in-house legal counsel concerning actual and potential litigation and claims;
- I reviewed minutes of meetings of those charged with governance and the Board and internal audit reports; and
- I addressed the risk of fraud through management override of controls by testing the appropriateness of journal entries and other adjustments; assessing whether the judgements on estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

I communicated relevant identified laws and regulations and potential risks of fraud to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

A further description of my responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at:
www.frc.org.uk/auditorsresponsibilities.

This description forms part of my certificate.

Other auditor's responsibilities

I am required to obtain sufficient appropriate audit evidence to give reasonable assurance that the expenditure and income recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

I communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control I identify during my audit.

Report

I have no observations to make on these financial statements.

Gareth Davies

Comptroller and Auditor General

15 July 2025

National Audit Office
157-197 Buckingham Palace Road
Victoria
London
SW1W 9SP

Statement of accounts

1 April 2024 – 31 March 2025

These accounts are presented to Parliament pursuant to paragraph 40 of Schedule 1 to the Equality Act 2006.

EHRC is a statutory non-departmental public body established under the Equality Act 2006. Its powers and duties are described in the 2006 and 2010 Equality Acts.

These accounts are prepared in accordance with the Government Financial Reporting Manual (FReM) and International Financial Reporting Standards (IFRS).

Statement of accounts

Primary statements

The Primary Statements include the Statement of Comprehensive Net Expenditure, the Statement of Financial position (Balance Sheet), the Cash Flow Statement and the Statement of Changes in Taxpayer's Equity. The Primary Statements are complemented by the subsequent notes.

The Statement of Comprehensive Net Expenditure shows the cost for the year of the EHRC's activities. It captures the inflow and outflow of resources for the financial year up to 31 March 2025, which have been received or incurred as part of the ordinary activities of the EHRC.

The Statement of Financial Position (Balance Sheet) is a statement showing the EHRC's assets and liabilities, that is, what is owned and what is owed on 31 March 2025. The net impact of this is funded by taxpayers' equity which is received as Grant in Aid funding from our sponsor body.

The Cash Flow Statement shows the changes in cash during the financial year and cash balance at the 31 March 2025. Investing activities represent the extent to which cash outflows have been made for resources which are intended to contribute to the EHRC's infrastructure.

Statement of accounts

Statement of Comprehensive Net Expenditure (SoCNE)

for the year ended 31 March 2025

		2024–2025	2023–2024
	Notes	£000	£000
Income			
Operating income	4	(31)	(28)
Total operating income		(31)	(28)
Expenditure			
Staff costs	3	13,627	14,480
Board and Committee Fees and NIC's	3	198	208
Purchase of goods and services	3	3,361	3,032
Depreciation and impairment charges	3	699	916
Provision expense	3	(23)	103
Total operating expenditure		17,862	18,739
Net operating expenditure		17,831	18,711
Interest cost on pension scheme liabilities	12	57	44
Interest cost on leases (IFRS16)	13	18	12
Net expenditure for the year		17,906	18,767
Other comprehensive net expenditure			
Items which will not be classified to net operating costs:			
Net (gain) / loss on revaluation of property, plant and equipment	5	(6)	(16)
Actuarial loss / (gain) on pension scheme liabilities	12	(54)	111
Comprehensive net expenditure for the year		17,846	18,862

The notes on pages 146 to 180 form part of these accounts.

Statement of accounts

Statement of Financial Position (SoFP)

as at 31 March 2025

		2024–2025	2023–2024
	Notes	£000	£000
Non-current assets			
Property, plant and equipment	5	829	937
Intangible assets	6	10	5
Right of use assets	13	860	905
Trade and other receivables	9	36	54
Total non-current assets		1,735	1,901
Current assets			
Trade and other receivables	9	430	587
Cash and cash equivalents	8	179	244
Total current assets		609	831
Total assets		2,344	2,732
Current liabilities			
Trade and other payables	10	(1,343)	(1,297)
Lease liabilities	13	(269)	(258)
Dilapidations provision	11	–	(37)
Pension liabilities	12	(108)	(118)
Total current liabilities		(1,720)	(1,710)
Total assets less current liabilities		624	1,022

Statement of accounts

Statement of Financial Position (SoFP)

as at 31 March 2025 (cont.)

		2024–2025	2023–2024
	Notes	£000	£000
Non-current liabilities			
Lease liabilities	13	(587)	(599)
Dilapidations provision	11	(296)	(282)
Pension liabilities	12	(948)	(1,048)
Total non-current liabilities		(1,831)	(1,929)
Total assets less total liabilities		(1,207)	(907)
Taxpayers' equity			
Revaluation reserve	SoCiTE	36	52
General reserve	SoCiTE	(1,243)	(959)
Total equity		(1,207)	(907)

The notes on pages 146 to 180 form part of these accounts.



John Kirkpatrick

Chief Executive and Accounting Officer

15 July 2025

Statement of accounts

Statement of Cash Flows (SoCF)

for the year ended 31 March 2025

		2024–2025	2023–2024
	Notes	£000	£000
Cash flows from operating activities			
Net expenditure*	SoCNE	(17,831)	(18,711)
Adjustments for non-cash transactions	SoCNE	699	916
Decrease in trade and other receivables	9	175	40
Increase / (decrease) in trade and other payables	10	46	(294)
(Decrease) / increase in provisions	11	(23)	103
Pension payments	12	(113)	(115)
Lease movements not passing through the SoCNE		(2)	3
Movement in capital payables not passing through the SoCNE		16	79
Net cash outflow from operating activities (a)		(17,033)	(17,979)
Cash outflow from investing activities			
Purchase of property, plant and equipment (PPE) and intangible assets	5&6	(242)	(244)
Movement in capital payables		(16)	(79)
Net cash outflow from investing activities (b)		(258)	(323)

* The 2023–24 operating cash flows have been reclassified to begin with net operating expenditure rather than net expenditure

Statement of accounts

Statement of Cash Flows (SoCF)

for the year ended 31 March 2025 (cont.)

		2024–2025	2023–2024
	Notes	£000	£000
Cash flows from financing activities			
Grant-in-aid received from sponsoring department	SoCiTE	17,546	18,973
Payments in respect of lease liabilities	13	(302)	(447)
Payments in respect of lease liabilities - interest	13	(18)	(12)
Net Financing (c)		17,226	18,514
Net increase/(decrease) in cash and cash equivalents in the year (a+b+c)	8	(65)	212
Cash and cash equivalents at the beginning of the financial year	8	244	32
Cash and cash equivalents at the end of the period	8	179	244

The notes on pages 146 to 180 form part of these accounts.

Statement of accounts

Statement of Changes in Taxpayers' Equity (SoCiTE)

for the year ended 31 March 2025

		Revaluation reserve	General reserve	Total
	Notes	£000	£000	£000
Balance at 31 March 2023		57	(1,075)	(1,018)
Grant-in-aid received from sponsoring department – cash draw down	SoCF	–	18,973	18,973
Net expenditure for the year	SoCNE	–	(18,767)	(18,767)
Remeasurements – actuarial (loss) / gain on pension scheme liabilities	12	–	(111)	(111)
Revaluation of PPE and intangibles	5&6	16	–	16
Transfer between reserves		(21)	21	–
Balance at 31 March 2024		52	(959)	(907)
Grant-in-aid received from sponsoring department – cash draw down	SoCF	–	17,546	17,546
Net expenditure for the year	SoCNE	–	(17,906)	(17,906)
Remeasurements - actuarial (loss) / gain on pension scheme liabilities	12	–	54	54
Revaluation of PPE and intangibles	5&6	6	–	6
Transfer between reserves		(22)	22	–
Balance at 31 March 2025		36	(1,243)	(1,207)

The notes on pages 146 to 180 form part of these accounts.

Statement of accounts

Notes to the financial statements for the period ending 31 March 2025

1.0 Accounting policies

The EHRC is a statutory non-departmental public body sponsored by the UK government's Minister for Women and Equalities and was established by the Equality Act 2006. It operates independently from government and Parliament and is Britain's national equality body.

These financial statements have been prepared in a form consistent with the Accounts Direction issued by the Secretary of State in accordance with the Equality Act 2006, and in accordance with the Government Financial Reporting Manual (FReM) as issued by HM Treasury. The accounting policies described in the FReM apply International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector. Where the FReM permits a choice of accounting policy, we have selected the accounting policy judged to be most appropriate to the circumstances of our organisation for the purpose of giving a true and fair view. The policies we have adopted are described below. They have been applied consistently in dealing with items that are considered material to the accounts.

There have been no changes to the underlying accounting policies used to prepare the 2024–25 Statement of Accounts.

Policies will continue to be reviewed as part of the accounts preparation and may be re-worded where this will aid understanding.

Figures in the financial statements are rounded to the nearest £000 unless otherwise stated.

We operate across the three nations of Great Britain and have offices in:

- London – Tintagel House, 92 Albert Embankment, SE1 7TY
- Manchester – Arndale House, Arndale Centre, M4 3AQ
- Cardiff – Companies House, Crown Way, Cardiff, CF14 3UZ
- Glasgow – 140 West George Street, Glasgow, G2 2HG

1.1 Accounting convention

These financial statements have been prepared under the historical cost convention modified to account for the revaluation of property, plant and equipment and intangible assets where material.

1.2 Going concern

The financial statements have been prepared on a going-concern basis. This is based on the assessment that the EHRC will continue to receive funding and operations will continue for the foreseeable future. This assessment has also considered that, for non-trading public sector entities, like the EHRC, the FReM provides that 'the anticipated continuation of the provision of a service in the future, as evidenced by inclusion of financial provision for that service in published documents, is normally sufficient evidence of going concern'.

The Equality Act 2006 requires the Secretary of State to provide sufficient funding for the EHRC to carry out the statutory duties contained within the Act and as an arm's length body sponsored by the Cabinet Office, the EHRC has no reason to assume that future funding will not be forthcoming. This going concern assessment is made up to 12 months from signing date which includes the initial part of the 2025–26 financial year. The EHRC has assumed that funding will continue beyond the 2025–26 financial year as outlined in the requirement to submit a three-year spending plan.

The Framework agreement between the EHRC and the Cabinet Office provides assurance that in the event of the EHRC being wound up and assets or liabilities of the EHRC will be passed to any successor organisation or the Cabinet Office if there is no successor body. In conclusion, these factors, and the anticipated future provision of services in the public sector, support the EHRC's adoption of the going concern basis for the preparation of the accounts.

1.3 Accounting judgements and key sources of estimation uncertainty

In applying the accounting policies and preparing the financial statements management is required to make certain judgements regarding complex transactions or those involving uncertainty about future events and estimates and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors considered to be relevant. These estimates and underlying assumptions are continually reviewed.

The nature of estimation, however, means that actual outcomes could differ from those estimates and could cause adjustment to the carrying amounts of assets and liabilities within the next financial year.

Areas of estimation uncertainty

The following are the key assumptions concerning the future and other key sources of estimation uncertainty at the time of the statement of our financial position:

- **Useful lives of non-current assets:** these are reviewed as at the reporting date and updated if expectations differ from previous estimates due to physical wear and tear, technical or commercial obsolescence, legal or other limits on their use
- **Impairment of non-current assets:** non-current assets are reviewed annually to ensure that the carrying values are not stated above their recoverable amounts
- **Leases (right of use assets) break clauses:** where a lease contains a break clause management assess whether or not this is likely to be exercised at commencement of the lease and the life of the asset will recognise this date. These will be reviewed to assess whether or not any changes to circumstances will result in changes to the lease term
- **Leases (right of use assets) discount rates:** if a discount rate is not implicit in a lease, the rate promulgated by HM Treasury effective at the date of the initial recognition or remeasurement will be used
- **Provisions:** provisions are based on the best estimate of the amount required to settle an obligation following an assessment of risks and uncertainties, HM Treasury discount rates for general provisions and post-employment benefits are applied where appropriate and may have an effect on liabilities disclosed
- **Retirement benefit obligations:** the pension scheme for the former chair of the EHRC, and for the former chairs and deputy chairs of legacy commissions, is unfunded and exposes the EHRC to uncertainty arising from the actuarial valuation of the scheme, which uses factors such as changes in life expectancy and discount rates to calculate the scheme's total liability

Changes to estimates

The paragraph below summarises a change in the accounting estimate (useful economic life - UEL) of non-current assets classed as office furniture (this category includes desks, chairs and meeting room equipment).

The annual review of the appropriateness of depreciation and amortisation accounting estimates was carried out in December 2024 in line with IAS8 requirements by the finance team and the head of ICT and estates.

This review led to a recommendation to amend the useful economic life of furniture and fittings to a range of 2 to 15 years (previously 10 to 15 years) which has been agreed by management.

The reasons for these changes are summarised below.

- The Commission has previously entered into long-term leases (in excess of five years) and when relocating to alternative premises has re-used existing furniture, this was possible due to the offices being of similar size and requirements not changing.
- As the Commission's estates strategy has evolved, particularly following on from the Covid-19 pandemic and the move to hybrid working models, we have experienced a reduction in both office size and lease length. This situation has been further exacerbated by the use of serviced offices in London and Glasgow which are provided fully furnished and therefore only require a small amount of EHRC furniture. These changes have resulted in surplus furniture which we have not been able to repurpose across other offices, the cost of storage and the likelihood of future requirements has led to items with an NBV being disposed of.
- If at the point of purchase assets are associated with a new lease, management will make an assessment to determine if the life of the asset will be aligned with the length of the lease. Similarly, if any assets are relocated across the Commission's estate, their remaining UEL will be reviewed at this point and amended if deemed appropriate.

The change has been applied prospectively from 1 April 2024 and has an estimated minor impact on the financial statements for 2024 as summarised below:

- increase in depreciation expense (SoCNE) £25,000-£30,000
- reduction in NBV of furniture assets (SoFP) £25,000-£30,000
- the impact in future years is expected to be minimal due to the current NBV of the asset pool (£178,000) at 31 March 2025

In conclusion, the above amendment will provide a more accurate view of the UEL of assets and the associated depreciation charge, the estimates will continue to be reviewed on an annual basis and adjusted as necessary to reflect the Commission's operating environment.

1.4 Newly issued IFRS not yet effective

New or amended standards are implemented in line with their adoption by the FReM.

IFRS17 – Insurance contracts replaces IFRS 4 Insurance contracts and is to be included in the FReM for mandatory implementation from 2025–26. It establishes the principles for the recognition, measurement, presentation and disclosure of insurance contracts within the scope of this standard.

Our assessment is that this will have no impact on our financial statements because we do not enter into insurance contracts.

The following two standards have been issued but have not been adopted into the FReM, and impact assessments will be carried out when the FReM interpretation is published.

IFRS 18 – Presentation and Disclosure in Financial Statements

IFRS 18, issued in April 2024 will replace IAS 1 Presentation of financial statements and will apply to reporting periods beginning on or after 1 January 2027 for the private sector; the implementation date for the public sector has not yet been confirmed and the impact of IFRS 18 on the Public Sector is still being assessed.

IFRS 19 – Subsidiaries without Public Accountability: Disclosures

IFRS 19 was issued in May 2024 and will apply to reporting periods beginning on or after 1 January 2027 for the private sector; the implementation date for the public sector has not yet been confirmed.

Non-investment asset valuations

In December 2023 HM Treasury released an exposure draft on potential changes to make to valuing and accounting for non-investment assets (for example PPE, intangible assets). The following changes to the valuation and accounting of non-investment assets is to be included in the 2025–26 FReM for mandatory implementation.

References to assets being held for their ‘service potential’ and the terms ‘specialised / nonspecialised’ assets are being removed from the FReM. Non-investment assets are instead described as assets held for their ‘operational capacity’. This change has no impact on the valuation basis of non-investment assets, which remains Existing Use Value (EUV).

An adaptation to IAS 16 will be introduced to withdraw the requirement to revalue an asset where its fair value materially differs from its carrying value. Assets are now valued using the one of the following processes:

- a revaluation supplemented by annual indexation every five years
- a rolling programme of valuations over a 5-year cycle, with annual indexation applied to assets during the 4 intervening years
- for non-property assets only, appropriate indices
- in rare circumstances where an index is not available, a revaluation every five years supplemented by a desktop revaluation in year 3

The option to measure intangible assets using the revaluation model is withdrawn. The carrying values of intangible assets at 31 March 2025 will be considered the historical cost at 1 April 2025.

Our assessment is that these changes are not expected to have a material impact on the financial statements due to the values of assets held.

Social benefits

The 2025–26 FReM will include new guidance on accounting for social benefits. The 2025–26 FReM will define social benefits as 'current transfers received by households (including individuals) intended to provide for the needs that arise from certain events or circumstances, for example, sickness, unemployment, retirement, housing, education, or family circumstances'.

The 2025–26 FReM clarifies that expenditure in respect of social benefit payments should be recognised at the point at which the social benefit claimant meets the eligibility requirements to receive the benefit. Only the expenditure for the period of entitlement that falls within the accounting year should be recognised.

Our assessment is that this will have no impact on our financial statements because we do not make social payments.

1.5 Grant-in-aid

The FReM requires the EHRC to account for grant-in-aid received as financing and to credit this to taxpayers' equity. This is due to grant-in-aid being regarded as a contribution from a controlling party, which gives rise to a financial interest in the residual interest of the EHRC.

Grant-in-aid received for purchasing non-current assets is also credited to taxpayers' equity.

1.6 Employee benefits

Benefits payable during employment

IAS19: Employee benefits, prescribes rules for recognition and presentation of various types of benefits that employers provide to their employees, under which short-term benefits are recognised as an undiscounted expense in the accounting period and include:

- staff salary costs which are recorded as an expense as soon as an organisation is obliged to pay them
- performance payments unpaid at the end of the year are recognised on an accruals basis, calculated as a fixed proportion of the total pay bill, which represents the maximum amount that can be paid out

Employee leave accrual

An accrual is made for the cost of any staff annual leave entitlement not taken at 31 March 2025, the accrual is made at the salary rates applicable on the date the accrual is made.

1.7 Operating segments

Operating segments (note 2) are based on the main reporting areas of our organisation and align with our internal reporting. Since segmental information for assets and liabilities is not reported to the Chief Operating Decision-Maker (CODM) at a segmental level, these are not included in the segmental reporting analysis.

The CODM has been identified as the Accounting Officer.

1.8 Recognition of income and expenditure

Income and Expenditure is accounted for in the year in which it takes place and is recognised in the financial statements on an accruals basis.

Expenditure in relation to services received (including services provided by employees) is recognised at the point that the services are received rather than when payments are made.

Operating income is principally the recovery (either full or partial) of costs incurred from other parties. Income is recognised when the transaction can be reliably measured, and it is probable that economic benefits associated with the transaction will flow to the EHRC.

Where income and expenditure has been recognised but cash has not been received or paid, a receivable or payable for the relevant amount is recorded in our statement of financial position.

1.9 Prepayments

Prepayments for goods and services which are to be provided in future periods are recorded as assets in our statement of financial position and recognised as an expense either when the goods or service are received or over the life of the agreement.

Items are recognised for prepayment if the total cost exceeds £100, items include:

- where a contractual obligation exists to pay for goods or services in advance of consumption (for example building lease charges) the cost is expensed over the period of the charge
- licence costs, subscriptions and maintenance agreements which are paid in full in advance are expensed across the duration of the agreement.

1.10 Property, plant and equipment

Recognition

Expenditure on the acquisition, creation or enhancement of property, plant and equipment is capitalised on an accruals basis, provided that a future economic benefit can be recognised, where the expected useful lives of the assets exceeds one year and that the cost of the item can be measured reliably.

Expenditure that maintains but does not add to an asset's potential to deliver future economic benefits or service potential (for example, for repairs and maintenance) is charged as an expense when it is incurred.

A £3,000 de minimis limit for capital expenditure is applied, either individually or in related groups of similar assets.

All property, plant and equipment are measured initially at cost, representing the cost attributable to acquiring the asset and bringing it into use in the manner intended by management. Assets that are held for their service potential and are not in use are measured subsequently at their current value in existing use.

All assets are restated at current value each year using producer price indices published by the Office for National Statistics, which are deemed to be the most appropriate valuation methodology available; unless management have assessed that there would be a highly immaterial difference due to the low value and period of remaining useful economic life. For 2024–25 the following asset classes have not been revalued Furniture and ICT and telecoms equipment.

Any gain on revaluation is credited to the revaluation reserve. Any loss is debited to the revaluation reserve to the extent that a gain has previously been recorded, and otherwise to the statement of comprehensive net expenditure.

Depreciation

Property, plant and equipment are depreciated over their estimated useful economic life using the straight-line basis commencing when the asset is placed in service. All assets' residual values, useful lives and methods of depreciation are reviewed at each financial reporting year-end and adjusted if appropriate.

We estimate the useful economic lives of assets as follows:

- fit-out costs (leasehold improvements) for premises: the lower of the useful economic life of the fit-out costs and the life of the lease
- office furniture: 2–15 years (previously 10–15 years)
- computer and networking equipment, telephones hardware: 2–7 years
- right of use assets: the contractual length of the lease, or where it is established that a break clause is likely to be exercised, the period of the break clause (see note 1.14)

Impairment

International Accounting Standard (IAS) 36, Impairment of Assets, has been adapted in the FReM.

Impairments that are due to a clear consumption of economic benefit are recognised in the statement of comprehensive net expenditure, rather than set against an available revaluation reserve.

Where impairment losses are identified that are not due to consumption, they are accounted for as follows:

- where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains)
- where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is charged to the statement of comprehensive net expenditure

Where asset revaluations cause impairment, an assessment is carried out to determine whether the impairment is due to the consumption of economic benefit and should be recognised in the statement of comprehensive net expenditure.

Disposals

When an asset is disposed of or decommissioned, the carrying amount of the asset is charged to the statement of comprehensive net expenditure as a loss on disposal. Net gains from disposals are credited to the statement of comprehensive net expenditure (that is, netted off against the carrying value of the asset at the time of disposal).

1.11 Intangible assets

Recognition

Intangible assets are acquired computer software licences and costs incurred in the development phase of internal computer software projects.

Intangible assets are recognised at cost initially, assets are revalued annually using producer price indices published by the Office for National Statistics, which is deemed to be the most appropriate valuation methodology. Any gain on revaluation is credited to the revaluation reserve. Any loss is debited to the revaluation reserve to the extent that a gain has been recorded previously, and otherwise to the statement of comprehensive net expenditure.

Costs incurred in the developmental phase of internal software projects are only capitalised if they are associated directly with the production of identifiable computer software programs controlled by our organisation that would generate economic benefits beyond one year and provided that several criteria are satisfied. These include the technical feasibility of completing the asset so that it is available for use, the availability of adequate resources to complete the development and use the asset, and how the asset will generate future economic benefit.

Other costs associated with developing or maintaining computer software are recognised as an expense when incurred.

Amortisation

Intangible assets are amortised over the estimated useful economic life of the asset using the straight-line basis, commencing at the point the asset is placed in service. Assets are assessed on an individual basis and an appropriate life applied dependent on the characteristics of the asset according to the following:

- software and associated services are assessed over the term of the software licence
- information technology assets are assessed over five years or over the unexpired time of the software licence (whichever is shorter)

Impairment

International Accounting Standard (IAS) 36, Impairment of Assets, has been adapted in the FReM.

Impairments that are due to a clear consumption of economic benefit should be recognised in the statement of comprehensive net expenditure, rather than set against an available revaluation reserve.

Where impairment losses not due to consumption are identified, they are accounted for as follows:

- where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains)
- where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is charged to the statement of comprehensive net expenditure

Where asset revaluations give rise to impairment, an assessment is carried out to determine if the impairment is due to consumption of economic benefit and should be recognised in the statement of comprehensive net expenditure.

Disposals

When an asset is disposed of or decommissioned, the carrying amount of the asset is charged to the statement of comprehensive net expenditure as a loss on disposal. Receipts from disposals are credited to the statement of comprehensive net expenditure as a gain on disposal (that is, netted off against the carrying value of the asset at the time of disposal).

1.12 Provisions and contingent liabilities

Provisions

In accordance with IAS 37 provisions are recognised when a legal or constructive obligation from a past event arises and an outflow of economic benefits will probably be required to settle the obligation, and the amount of the obligation can be assessed reliably.

For legal costs a provision is made when there is a probability of greater than 50% that the case will be lost and being ordered to pay costs. Legal cases are taken on by the EHRC to challenge and clarify the law, which may result in adverse judgment being made. The probability assessment is carried out on a case-by-case basis, taking the advice of external legal experts.

For dilapidations, a provision is made for the estimated costs of returning premises to their original condition at the end of the lease period where there is an obligation contained in the lease.

If a value is not provided by the lessor within the lease the provision is calculated utilising a rate per square foot based on a professional valuation. The provisions are discounted according to the HM Treasury discount rate when their utilisation is expected to be more than a year from the date of creation.

HMT General provisions discount rates	2024–25	2023–24
Short-term: applied on cash flows from up to and including five years from the date of the Statement of Financial Position	4.03%	4.26%
Medium-term: applied on cash flows from after five and up to and including 10 years from the date of the Statement of Financial Position	4.07%	4.03%

Contingent liabilities

A contingent liability arises where an event has taken place that gives the EHRC a possible obligation which will only be confirmed by the occurrence or otherwise of uncertain future events not wholly under the EHRC's control. Contingent liabilities also occur when a provision would otherwise be made but it is not probable that an outflow of resources will be required, or the amount of the obligation cannot be measured reliably. Contingent liabilities are not recognised in the financial statements but are disclosed in a note to the accounts.

1.13 Pensions

Current and former employees are covered by the provisions of the Principal Civil Service Pension Scheme (PCSPS) and the Civil Servants and Other Pension Scheme (CSOPS). The defined-benefit elements of the scheme are unfunded and non-contributory except in respect of dependents' benefits. We recognise the expected cost of these elements on a systematic and rational basis over the period during which we benefit from employees' services by paying into the PCSPS/CSOPS amounts calculated on an accruing basis. Liability for payment of future benefits is a charge on the PCSPS/CSOPS. Regarding the defined-contribution elements of the scheme, we recognise the contributions payable for the year.

Pension benefits for former Chairs of the EHRC and its legacy organisations are provided under a 'broadly by analogy' scheme. The scheme disclosures are stated in accordance with IAS 19, Employee Benefits. This scheme is an unfunded defined-benefit scheme and pensions are administered in accordance with the standard rules (by analogy with the PCSPS).

Where actuarial gains and losses arise from changes to actuarial assumptions when revaluing future benefits, and from actual experience in respect of scheme liabilities and investment performance of scheme assets being different from previous assumptions, then the actuarial gains and losses are recognised directly in taxpayers' equity for the year.

1.14 Leases (as a Lessee)

IFRS 16, effective from 1 April 2022 removed the distinction between operating and finance leases and requires lessees to recognise leases as 'right of use' assets and to disclose the corresponding liabilities for all leases, unless they are exempt due to the lease term being 12 months or less and / or the underlying asset having a low value (less than £5,000). In accordance with the FReM, occupancy agreements between government departments are treated as contracts and are within the scope of IFRS 16. IFRS 16 is not applied to intangible assets.

Recognition of assets

At the commencement of a contract, EHRC assesses whether the contract constitutes a lease by conveying the right to control the use of an identified asset for a period of time in exchange for consideration, including whether:

- the contract involves the use of an identified asset
- the EHRC has the right to obtain substantially all of the economic benefit from the use of the asset throughout the period of use
- the EHRC has the right to direct the use of the asset for the duration of the period of use

EHRC also assesses whether any break clauses or extension options are likely to be exercised at the lease commencement date. These assumptions are reassessed if there are significant events or changes in circumstances that were not anticipated at commencement.

Where the interest rate implicit in a lease cannot be readily determined, the lease liability is calculated using the HM Treasury discount rates provided in PES papers as the incremental borrowing rate.

Right of use assets

Right of use assets are initially measured at cost, which comprises the total of the lease liability and are subsequently measured at current value in existing use in line with property, plant and equipment assets, using cost as a proxy for fair value as significant market fluctuations are not anticipated.

The right of use asset is depreciated using the straight-line method from the commencement date to the end of the lease term.

IAS 36 Impairment of Assets is applied in line with property, plant and equipment assets to determine whether the right of use asset is impaired and to account for any impairment loss identified.

Lease liabilities

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease, or if that cannot be readily determined, the rate provided by HM Treasury (HMT).

The discount rates applicable for the current reporting period are:

- for leases that commenced or are remeasured in the 2025 calendar year 4.81%
- for leases that commenced or are remeasured in the 2024 calendar year 4.72%

The lease payment is measured at amortised cost using the effective interest method. It is re-measured when there is a change in future lease payments or if EHRC changes its assessment of whether it will exercise an extension or break option.

The EHRC does not currently act as a lessor.

1.15 Value Added Tax (VAT)

Most of the activities of EHRC are outside the scope of VAT and input tax on purchases is not recoverable. Irrecoverable VAT is charged to the relevant expenditure category or included in the capitalised purchase costs of fixed assets.

1.16 Related-party transactions

The EHRC is required to disclose material transactions with related parties, bodies or individuals that have the potential to control or influence our organisation or to be controlled or influenced by us.

Disclosure of these transactions allows readers to assess how the EHRC might have been constrained in its ability to operate independently or might have secured the ability to limit another party's ability to bargain freely with us.

2 Statement of outturn by operating segment

Our operations are divided into two segments, the Regulatory functions as described below are delegated to the Deputy Chief Executive whilst the Chief Executive as Accounting Officer retains overall responsibility. The teams included in each area are summarised below. During 2024–25, the EHRC’s reporting structure was re-organised, the tables below show the reporting responsibilities at 31 March 2025.

Corporate services

- Communications, International and Correspondence
- Estates and Facilities, People and Information Technology
- Senior Management Team and Private Office
- Finance, Procurement, Planning and Governance
- Board and Committees

Regulation

- Policy
- Strategy
- Human Rights Monitoring
- Evidence and Data
- Wales
- Scotland
- Compliance and Regulatory hub
- Legal and Enforcement
- Corporate Law and Information Governance

2024–25	Gross expenditure	Income	Net expenditure
	£000	£000	£000
Corporate services	8,075	(8)	8,067
Regulation	9,088	(23)	9,065
Depreciation and amortisation charges	699	–	699
Total operating expenditure	17,862	(31)	17,831
Interest cost on pension scheme liabilities	57	–	57
Interest cost on leases	18	–	18
Total net expenditure	17,937	(31)	17,906

The 2023–24 totals in the table below have been amended to provide comparatives for the previous year.

2023–24 (represented)	Gross expenditure	Income	Net expenditure
	£000	£000	£000
Corporate services	8,111	(8)	8,103
Regulation	9,712	(20)	9,692
Depreciation and amortisation charges	916	–	916
Total operating expenditure	18,739	(28)	18,711
Interest cost on pension scheme liabilities	44	–	44
Interest cost on leases	12	–	12
Total net expenditure	18,795	(28)	18,767

Capital expenditure, assets and liabilities are not reported to the CODM at a segmental level and have not therefore been included in the tables.

3 Expenditure

	2024–2025	2023–2024
	£000	£000
Staff Costs		
Total staff costs*	13,546	14,437
Agency staff	81	43
Board and Committee fees	198	208
Total Staff Costs	13,825	14,688
Purchase of goods and services		
ICT and telecommunications	704	700
Premises costs**	651	510
Legal	380	378
Support and office services	334	528
Staff support, recruitment and training	304	201
Travel and subsistence	251	196
Advisory services	248	112
Publication and information	194	244
Research and policy development	118	10
Auditor's remuneration***	87	73
Rentals under operating leases	50	40
Access to work	40	40
Total purchase of goods and services	3,361	3,032

* 2023–24 figures, previously reported separately have been consolidated in this one line with the further breakdown included in Remuneration and staff report (page 120)

** Premises costs include the VAT element of IFRS 16 lease payments
- £50,000 and short-term lease payments - £70,000

*** No non-audit services were provided by the external auditors

3 Expenditure (cont.)

	2024–2025	2023–2024
	£000	£000
Non-cash items		
Depreciation of property, plant and equipment	345	409
Amortisation of intangible assets	6	72
Depreciation Right of Use assets	348	438
Gain / Loss on disposal of ROU assets	–	(3)
Provision expense	(35)	103
Borrowing costs of provisions (unwinding of discount on provisions)	12	–
Total operating expenditure	17,862	18,739
Interest cost on pension scheme liabilities	57	44
Interest cost on IFRS16 Leases	18	12
Total net finance expenditure	75	56
Total expenditure	17,937	18,795

4 Income

	2024–2025	2023–2024
	£000	£000
Access to work scheme	23	26
Other income	8	2
Total income	31	28

5 Plant, property and equipment

	Leasehold improvement	IT and telecoms equipment	Furniture	Payments on account and assets under construction	Total
2024–2025	£000	£000	£000	£000	£000
Cost or valuation					
At 1 April 2024	1,466	979	367	16	2,828
Additions in year	48	146	37	–	231
Reclassifications and transfers	–	16	–	(16)	–
Disposals	(431)	(79)	(20)	–	(530)
Revaluations	7	–	–	–	7
At 31 March 2025	1,090	1,062	384	–	2,536
Depreciation					
At 1 April 2024	1,260	434	197	–	1,891
Charge in year	107	200	38	–	345
Disposals	(431)	(79)	(20)	–	(530)
Revaluations	1	–	–	–	1
At 31 March 2025	937	555	215	–	1,707
Carrying value					
At 31 March 2024	206	545	170	16	937
At 31 March 2025	153	507	169	–	829

5 Plant, property and equipment (cont.)

	Leasehold improvement	IT and telecoms equipment	Furniture	Payments on account and assets under construction	Total
2023–2024	£000	£000	£000	£000	£000
Cost or valuation					
At 1 April 2023	1,321	1,156	371	94	2,942
Additions in year	35	178	3	16	232
Reclassifications and transfers	94	–	–	(94)	–
Disposals	(22)	(359)	(19)	–	(400)
Revaluations	38	4	12	–	54
At 31 March 2024	1,466	979	367	16	2,828
Depreciation					
At 1 April 2023	1,066	607	171	–	1,844
Charge in year	186	184	39	–	409
Disposals	(22)	(359)	(19)	–	(400)
Revaluations	30	2	6	–	38
At 31 March 2024	1,260	434	197	–	1,891
Carrying value					
At 31 March 2023	255	549	200	94	1,098
At 31 March 2024	206	545	170	16	937

6 Intangible assets

	Software	Total
2024–2025	£000	£000
Cost or valuation		
At 1 April 2024	395	395
Additions	11	11
Disposals	(21)	(21)
Revaluations	–	–
At 31 March 2025	385	385
Amortisation		
At 1 April 2024	390	390
Charge in year	6	6
Disposals	(21)	(21)
Revaluations	–	–
At 31 March 2025	375	375
Carrying value		
At 31 March 2024	5	5
At 31 March 2025	10	10

6 Intangible assets (cont.)

2023–2024	Software	Total
	£000	£000
Cost or valuation		
At 1 April 2023	382	382
Additions	12	12
Disposals	–	–
Revaluations	1	1
At 31 March 2024	395	395
Amortisation		
At 1 April 2023	317	317
Charge in year	72	72
Disposals	–	–
Revaluations	1	1
At 31 March 2024	390	390
Carrying value		
At 31 March 2023	65	65
At 31 March 2024	5	5

7 Financial instruments

Due to the EHRC's cash requirements being met through the estimate process of our sponsoring department, financial instruments play a more limited role in creating and managing risk than would apply in a non-public-sector body. Most financial instruments we hold relate to contracts to buy non-financial items in line with our expected purchase and usage requirements, therefore the exposure to credit, liquidity and market risk is considered minimal.

8 Cash and cash equivalents

	2024–2025	2023–2024
	£000	£000
At 1 April	244	32
Net change in cash and cash equivalent balances	(65)	212
Balance at 31 March	179	244

All cash balances are held with the Government Banking Service (GBS). The EHRC does not hold any cash equivalents.

9 Trade and other receivables

	2024–2025	2023–2024
	£000	£000
Amounts falling due within one year		
Trade receivables	17	33
Prepayments	366	544
Accrued income	9	10
Rent deposit	38	–
Total falling due within one year	430	587
Amounts falling due after one year		
Prepayments	36	54
Total falling due after one year	36	54
Total receivables	466	641

10 Trade payables and other liabilities

	2024–2025	2023–2024
	£000	£000
Amounts falling due within one year		
Accruals	316	364
Trade payables	245	24
Other taxation and social security	253	335
Holiday pay accrual	252	286
Pension payments	275	278
VAT	2	10
Current part of lease liabilities	269	258
Total falling due within one year	1,612	1,555
Amounts falling due after one year		
Non-current part of lease liabilities	587	599
Total payables	2,199	2,154
Total payables (net of lease liabilities)	1,343	1,297

11 Provisions for liabilities and charges

	2024–2025	2023–2024
	Dilapidation provision	Dilapidation provision
	£000	£000
Balance at 1 April	319	216
Provided in year	–	282
Provisions not required / written back	(37)	(179)
Provisions utilised	–	–
Unwinding of discount rate	12	–
Change in discount rate	2	–
Balance at 31 March	296	319

	2024–2025	2023–2024
	Dilapidation provision	Dilapidation provision
	£000	£000
Ageing of provisions		
Not later than one year	–	37
Later than one and not later than five years	296	282
Later than five years	–	–
Total	296	319

12 Pension liabilities (retirement benefit obligations)

Pension liabilities comprise pension benefits for the former Chair of the EHRC and former Chairs and Deputy Chairs of legacy Commissions. The benefits are provided under a scheme broadly by analogy with the PCSPS.

The pension scheme is unfunded, with benefits being paid as they fall due and guaranteed by our organisation. There is no fund and therefore no surplus, deficit or assets. The Government Actuary's Department, using the financial assumptions in the tables below, has calculated the scheme liabilities at 31 March 2025.

	31 March 2025	31 March 2024
Assumptions %	%	%
Rate used to discount scheme liabilities	5.15	5.10
Rate of inflation: Consumer Prices Index	2.65	2.55
Rate of increase for pensions in payment and deferred pensions	2.65	2.55

	2024–25	2023–24
Liabilities	£000	£000
Active members (past service)	–	–
Deferred pensioners	–	–
Current pensioners	1,056	1,166
Present value of scheme liabilities	1,056	1,166

	2024–25	2023–24
Analysis of movement in scheme liability	£000	£000
Balance at 1 April	1,166	1,126
Net interest – recognised in net expenditure for the year	57	44
Actuarial loss / (gain) – in other comprehensive expenditure	(54)	111
Less benefits paid	(113)	(115)
Present value of scheme liabilities	1,056	1,166
Ageing of liabilities		
Not later than one year	108	118
Later than one and not later than five years	448	472
Later than five years	500	576
Total	1,056	1,166

	2024–25	2023–24
Actuarial gains/losses to be recognised in other comprehensive income	£000	£000
Experience (gain) / loss arising on the scheme liabilities	(66)	202
Changes in assumptions underlying the present value of the scheme liabilities	12	(91)
Net total actuarial (gain) / loss stated in other comprehensive expenditure	(54)	111

Experience gain arising on the scheme liabilities amounted to £66,000 (a £202,000 loss in 2023–24), changes in the demographic and financial assumptions underlying the valuation of the scheme have resulted in a loss to the scheme of £12,000 (a £91,000 gain in 2023–24). The total re-measurements were a gain of £54,000 (a £111,000 loss in 2023–24) which is recognised directly in taxpayers' equity.

Experience loss / (gain) as a percentage of scheme liabilities	2024–25	2023–24
	£000	£000
Experience loss / (gain) arising on the scheme liabilities	(66)	202
Net present value of the scheme liabilities	1,056	1,166
Percentage of scheme liabilities at the year end	(6.30)	17.30

The sensitivity analysis of Scheme Liabilities defined benefit obligations (DBO) to changes in the significant actuarial assumptions (keeping all other assumptions unchanged) indicates the following:

		%	£000
Rate of discounting scheme liabilities	+ 0.5% a year	(4)	(42)
Rate of increase in CPI	+ 0.5% a year	4	40
Life expectancy – each member assumed 1 year younger than their actual age		3	34

Opposite changes in assumptions to those above would produce approximately equal and opposite changes in the DBO. Similarly, doubling the changes in the assumptions will produce approximately double the changes in the DBO. The sensitivities show the changes in each assumption in isolation. In practice, such assumptions rarely change in isolation and given the interdependencies between them, the impacts may offset to some extent.

The longevity assumptions used in the valuation of the scheme are detailed in the table below:

Current pensioners Exact age	31 March 2025		31 March 2024	
	Men (yrs)	Women (yrs)	Men (yrs)	Women (yrs)
60	26.5	28.5	26.7	28.2
65	21.9	23.6	21.9	23.3

13 Leases

IFRS 16 Leases has been implemented from 1 April 2023. Leases previously recognised as operating leases, along with new leases acquired that meet the requirements of IFRS 16 are now recognised as right-of-use assets at an amount equal to the initial lease liability, adjusted by any rent-free periods, other associated costs and VAT payable. The corresponding liability is calculated based on the present value of future cash flows for each lease over the applicable lease term.

The EHRC's current lease contracts comprise the rental of office space, two new agreements commenced in 2024–25, Glasgow – classed as IFRS 16 and London – classed as a short-term lease. One lease (London) ended during the reporting period. The leases relate to premises at the locations shown below.

Office leases (IFRS 16)	Start	End	Term
Manchester	April 2022	December 2027	5 yrs 9 months
Cardiff	October 2022	October 2032	10 years
Glasgow	June 2024	June 2029	5 years
London (Windsor House)	April 2022	September 2024	2 yrs 6 months

Office leases (Short Term)	Start	End	Term
London (Tintagel House)	February 2025	January 2026	12 months

Office leases	
Right of Use assets 2024–25	£000
Cost or valuation	
At 1 April 2024	1,722
Additions in year	303
Disposals	(548)
Revaluations	–
At 31 March 2025	1,477
Depreciation	
At 1 April 2024	817
Charge in year	348
Disposals	(548)
Revaluations	–
At 31 March 2025	617
Carrying value	
At 31 March 2024	905
At 31 March 2025	860

	Office leases
Right of Use assets 2023–24	£000
Cost or valuation	
At 1 April 2023	1,772
Additions in year	–
Disposals	(50)
Revaluations	–
At 31 March 2024	1,722
Depreciation	
At 1 April 2023	429
Charge in year	438
Disposals	(50)
Revaluations	–
At 31 March 2024	817
Carrying value	
At 31 March 2023	1,343
At 31 March 2024	905

Lease liabilities

	2024–25	2023–24
Total future lease obligations are given below:	£000	£000
Office leases		
Not later than one year	284	264
Later than one year but not later than five years	566	553
Later than five years	40	56
Less interest element	34	16
Present value of obligations	856	857
Current portion	269	258
Non-current portion	587	599
Short term lease obligations	104	–

Lease elements within the Statement of Comprehensive Net Expenditure

Elements in the Statement of Comprehensive Net Expenditure	2024–25	2023–24
	£000	£000
Office leases		
VAT element of lease payments*	50	40
Expense relating to short-term leases*	70	–
Depreciation	348	435
Interest expense	18	12

* see note 3 – premises costs

Cash outflow for leases

	2024–25	2023–24
Total paid to Landlords in respect of lease payments	£000	£000
Payment of principal lease cost	302	447
Interest	18	12
VAT	50	40
Total payment	370	499

14 Capital commitments

Significant commitments	31 March 2025	31 March 2024
ICT equipment refresh	–	7
ICT licenses	–	–
Total	–	7

No capital commitments exist as 31 March 2025.

15 Contingent liabilities disclosed under IAS 37

At 31 March 2025, no contingent liabilities exist (none on 31 March 2024).

16 Related party transactions

The EHRC is a non-departmental public body sponsored by the Cabinet Office which is regarded as a related party.

During the year funding of £17.546 million was received from the Cabinet Office in the form of grant-in-aid. No other significant transactions have taken place.

The EHRC leases premises managed by the GPA, which is an executive agency of the Cabinet Office and payments have been made to the GPA in respect of rent and other costs associated with the leases. Transactions have also taken place with other government departments in the normal performance of EHRC's functions.

The EHRC does not have any subsidiaries.

No board member or manager has undertaken any transactions with the EHRC during the reporting period except for remuneration and re-imbursement of expenses incurred which is reported on pages 101 to 110.

17 Events after the reporting period

On 16 April 2025, the UK Supreme Court ruled in *For Women Scotland v The Scottish Ministers* that the definition of sex in the Equality Act 2010 (the Act) should be interpreted as 'biological' sex only.

We published an interim update on 25 April to highlight the main consequences of the judgment.

A public consultation concerning the update of relevant sections of our code of practice for services, public functions and associations was launched on 20 May and closed to responses on 30 June.

We have received notice of Judicial Review applications which seek to challenge both the interim guidance and the consultation process. These will not affect the financial statements for 2024–25. We cannot estimate what effect they will have in 2025–26 due to the early stages of the applications.

Authorised for issue

The accounts have been authorised for issue by the Accounting Officer on the same date as the Comptroller and Auditor General's Audit Certificate.

Contacts

This publication and related equality and human rights resources are available from [our website](#). Questions and comments regarding this publication may be addressed to: correspondence@equalityhumanrights.com.

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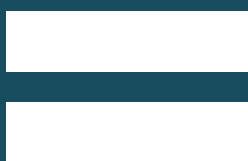
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