Equality and Human Rights Commission

Annual report and accounts

2025–26

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Equality and Human Rights Commission

Annual report and accounts 2025–2026

For the period 1 April 2025 to 31 March 2026

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Introduction

Chair's foreword

I am delighted to present our latest annual report and reflect on the achievements of the Equality and Human Rights Commission (EHRC) over the past year, a year which includes the first few months of my term as Chair.

When I stepped into the role in December 2025, the first thing that stood out to me was the breadth of the work that goes on at the EHRC and the complexity of some of the issues we deal with.

As I have become more familiar with the organisation, I've been impressed by the expertise, professionalism and commitment shared across the EHRC. Our Board, leadership team and staff are dedicated to making Britain a fairer and more equal place. I am proud to work alongside them in helping to achieve this ambition.

Similarly, it was a privilege to succeed Baroness Kishwer Falkner as Chair, she left a significant legacy and I am grateful for her service in leading the EHRC. I'm committed to championing equality and human rights with the same focus and tenacity.

I would also like to recognise those former commissioners who completed their terms over the past twelve months. Thank you to Akua Reindorf KC, Baroness Joanne Cash and especially Dr Lesley Sawers, who sat on the Board for nearly a decade as both Scotland Commissioner and latterly as Deputy Chair. The EHRC has benefited from the insight, experience and decision-making of all our former commissioners. More recently, we have welcomed Ali Harris and Professor Shazia Choudhry to the Board, as interim Commissioners. We have also welcomed Martyn Jones, who has been a member of the EHRC's Wales Committee since 2019, as a Commissioner. We're grateful to be able to draw on their wealth of expertise in equality and human rights.

From the outset, I prioritised engaging with a wide range of stakeholders across governments, Parliaments and civil society. It's important to me not only to build on the strong, existing relationships the EHRC has, but also to nurture new ones. Bringing fresh perspectives to the issues we care deeply about helps us find new ways to address them.

As part of this, we co-hosted an event with Equally Ours where I gave my first keynote speech to a room full of people who have dedicated their careers to promoting equality and human rights.

It was at this event I set out one of my key missions for the years ahead: using our platform to make the case for equality and human rights clearly, confidently, and in language that connects with people's real lives. I argued that human rights are essential in addressing the challenges of everyday life. They form the foundation of a fair and functioning society, helping to protect access to basic needs such as housing, healthcare, and other services amid rising living costs. At the same time, human rights provide a shared framework that promotes respect and inclusion, helping to reduce social division and strengthen cohesion.

This is the case I want to make during my time at the EHRC: that human rights are for everyone. It's why I am committed to hearing from as many diverse voices as I can. It's important we take our arguments beyond the networks that already agree with us, and we listen and talk to those with opposing views, particularly where these perspectives are gaining influence. By broadening the conversation in this way, we can better demonstrate that the rights we defend are relevant to, and valued by, all.

A significant portion of my first few months as Chair has been focused on getting our updated code of practice for services, public functions and associations into the hands of those who need it. Much of the work to get this guidance up to date was carried out before I joined. I'm grateful to both EHRC colleagues and the more than 50,000 respondents who provided feedback on the draft Code.

It will be essential in helping those with responsibilities under the Equality Act 2010 to understand and comply with the law – and will play an important part in preventing people from experiencing discrimination.

The updated Code has undoubtedly attracted considerable public attention this year. But as this annual report sets out, the EHRC's work throughout the year has spanned the full breadth of our equality and human rights mandate. From improving the accessibility of public transport for disabled people, to working with restaurants and retailers to strengthen protections against sexual harassment, and holding governments to account on their commitments to tackle racism, we have been at the forefront of pressing equality and human rights concerns.

I hope this report demonstrates just how much impact the EHRC has in protecting and promoting human rights for everyone in Britain. I'm looking forward to continuing to deliver on that mission over the next few years, and I'm proud to be at the helm of such a vital organisation.

Dr Mary-Ann Stephenson
Chair

Introduction

Chief Executive's foreword

This annual report covers a period when we have said farewell to a Chair and three other Commissioners and welcomed a new Chair and three new Commissioners. I am grateful to them all, and to the Commissioners who have served throughout the year, for their leadership and support of the EHRC's staff.

It also reports on the first year of our 2025 to 2028 strategic plan. We designed this plan to focus our expertise in areas where the evidence shows it can make the most difference. By updating our strategic priorities and improving how we respond to emerging and immediate equality concerns, we have been able to achieve a lot. This is despite the constraints of multiple competing and high-profile demands on our resources and a budget that has remained static in real terms since 2012.

To deliver the ambitions of our strategic plan within our budget, we need an organisational design that supports clearer priorities, faster decision-making and more effective collaboration. Our change programme will help us to deploy our resources where they have the greatest impact, respond more quickly to what matters most and work in a way that is financially sustainable in the long term.

As an organisation, we have remained steadfast in how we regulate equality. We have closely monitored how bodies across England, Scotland and Wales comply with the Public Sector Equality Duty, we've improved compliance with the law on pay gap reporting, and we've held governments to account against Britain's international human rights commitments, acting in concert with our fellow National Human Rights Institutions in Scotland and Northern Ireland.

We have responded with agility to emerging equality and human rights risks and opportunities. Most notably, in light of high demand for guidance following the Supreme Court ruling on the definition of sex in the Equality Act 2010, we were conscious of the potential for the judgment and its consequences for the protected characteristics of sex, sexual orientation and gender reassignment to be misinterpreted. The judgment was clear that everyone remains protected from discrimination and harassment.

As the body responsible for ensuring that duty-bearers understand and comply with the law, we responded to calls for guidance by issuing an interim update highlighting key

implications of the judgment. We subsequently prepared and consulted on updates to our code of practice for services, public functions and associations to reflect the judgment as well as other changes to equality law since it was originally published. We have worked to make sure this guidance is legally accurate and as useful as possible for duty-bearers and hope it becomes statutory soon. This work has attracted considerable public attention and controversy. We have successfully defended it against legal challenge and responded to unprecedented levels of public and media interest. Commissioners and staff have shown extraordinary diligence, professionalism and resilience through this period of heightened demand.

Though this high-profile work obliged us to divert attention and capacity away from some other work, we continued to make good use of our enforcement powers. As part of our ongoing legal agreement with McDonald's, we agreed a strengthened action plan with them to better protect their staff from sexual harassment at work. We also ensured that Live Nation and its festival operator took important steps to make popular festivals more accessible for disabled people.

Much of our work involves advising and influencing governments and Parliaments in England, Scotland and Wales to protect equality and human rights. Some highlights included briefing Parliamentarians in the UK and Scotland about equality considerations in proposed assisted dying legislation and successfully encouraging Welsh Government to improve its Disabled People's Rights Plan.

Our uniformed services programme continues to support important public sector employers to tackle harassment, discrimination and victimisation in the services. This year we published a comprehensive guide on collecting and analysing equality data, helping leaders to identify and tackle inequalities in the sector. We have also formed partnerships with sector leaders, like the National Fire Chiefs Council, securing their commitment to eliminate workplace discrimination. And we have worked with regulators of the uniformed services to make sure respect and inclusion are embedded into their inspection frameworks.

We have made progress in our programme dedicated to strengthening active participation in society. Although public transport is vital for many disabled and older people to be able to live and work independently, too often, there are barriers to travelling. We published guiding principles to help government make decisions about accessible transport, transport users to understand their rights and transport operators to ensure they are upheld.

Behind every piece of necessary work are the people who make it happen: our EHRC colleagues. The achievements recorded in this annual report do them credit and prepare for what we will accomplish next.

John Kirkpatrick
Chief Executive

Introduction

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 Great Britain. We are the regulator for both the Equality Act 2006 and the Equality Act 2010.

We are Britain's 'A-status' 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 reserved to the UK Parliament.

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

We are required to promote the understanding and protection of human rights and to encourage good practice. That includes explaining how the European Convention on Human Rights (ECHR) benefits us and the risks to everybody in the UK if these freedoms and protections are weakened. It also includes assessing and reporting on the UK's progress in meeting its human rights obligations.

Our vision is to support a society founded on equality and human rights, in which 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. Our **strategic plan 2025 to 2028** and our **business plan 2025 to 2026** focus on our duties to:

- promote and protect equality and human rights
- monitor the effectiveness of legislation
- review how Britain is performing on equality and human rights

Our role 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 across Britain
- preventing and challenging discrimination, so everyone has a fair chance in life
- protecting people's rights, so everyone is treated fairly, with dignity and respect

We adhere to the **UK government's Regulators' Code**, a framework for how regulators should engage with those they regulate and develop policies and procedures that guide their regulatory activities. The code is built around five principles of good regulation:

- proportionality
- accountability
- consistency
- transparency
- targeting

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 2025 to 2026, the first year of our strategic plan 2025 to 2028.

Performance report

Introduction

This annual report sets out our performance and delivery in the first year of our strategic plan 2025 to 2028. This year has been a period of both continuity and change. We have continued to deliver our core responsibilities and statutory duties, as well as conducting longer-term, coordinated programmes of action to achieve lasting change for society.

We have also adopted new ways of working to help us focus on the most significant and urgent issues, ensuring we apply the right tools and resources to maximise impact.

Achievements in 2025 to 2026

2025 to 2026 has been a demanding yet rewarding year, with successes across our broad remit. We have:

- strengthened capability and compliance with the Public Sector Equality Duty (PSED) within the health, education and regulatory sectors, and within central and local government across our three nations
- ensured the UK adheres to its international human rights treaty obligations, identifying, reviewing and setting out where human rights gaps and risks still persist
- achieved a 100% success rate in firms reporting their gender pay gap data
- secured legally binding agreements from the Welsh Government and McDonald's, obliging them to address unlawful policies, practices and behaviour
- concluded agreements with IKEA, Lidl and Live Nation after having formally monitored their action plans to address unlawful practices and behaviours

- made strong progress in our investigation and assessment into whether the Department for Work and Pensions breached equality law in relation to making health assessment determinations for people with mental impairments
- intervened in several significant judicial reviews, which has helped to reinforce our role as an important stakeholder in these debates
- delivered an authoritative and fully updated code of practice for services, public functions and associations to the Minister for Women and Equalities following the Supreme Court judgment, which clarified the legal meaning of the terms 'sex', 'man' and 'woman' for the purposes of applying the Equality Act 2010
- responded to UK government consultations, advised on legislation, influenced policy and engaged extensively with departments and parliamentarians across all three nations
- published guidance on collecting and analysing equality data for the uniformed services, uniquely co-designed by us and the sector
- worked constructively with Network Rail on improvement works to provide better access for disabled and older users and local residents

Proposals regarding the European Convention on Human Rights (ECHR)

Equality and human rights are fundamental to shaping our lives, promoting dignity, fairness, and positive outcomes for us all. Over the past year, there has been heightened awareness of how these rights and protections may be put at risk. In response to UK government proposals regarding the European Convention on Human Rights (ECHR) and migration, we worked with the Scottish and Northern Irish Human Rights Commissions to issue a joint statement urging the UK government not to weaken the protections afforded by the ECHR.

We will continue to closely monitor developments and provide advice to ministers on the importance of human rights to support a fair and inclusive society.

Our code of practice for services, public functions and associations

In April 2025, the UK Supreme Court issued its judgment in the appeal of For Women Scotland Ltd v The Scottish Ministers. This judgment clarified the correct legal interpretation of 'sex', 'man' and 'woman' in the Equality Act 2010. It required us to make revisions to the code of practice for services, public functions and associations (the Code) to ensure it aligned with the clarified legal position. As part of this work, we launched a consultation on changes to the Code which resulted in over 50,000 responses from organisations, legal professionals, and individuals across Great Britain reflecting the high level of interest in the issue.

The work to update the Code took place in a complex, sensitive, and highly scrutinised environment. It meant making difficult prioritisation and redeployment decisions, leading to delayed or paused programmes of work. It placed significant pressure on teams across our organisation, who had to meet significantly increased demand over a sustained period.

The work following the Supreme Court judgment put us in the public spotlight, attracted criticism and affected our reputation and external relationships. We continue to work to maintain both. It also led to two legal challenges being brought against us during this period, both of which were successfully defended.

Our internal change programme

Our change programme aims to evolve the way we work through the design and delivery of a new operating model, supported by new processes and ways of working across our organisation. During 2025–26 we successfully launched a centralised triage and assessment system, enabling us to respond more effectively to emerging issues and new information. This evidence-driven process helps us prioritise our work and adapt rapidly.

Performance report

Our strategic plan 2025 to 2028

Our current strategic plan focuses on our principal purpose and duties:

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

Throughout 2025 to 26, we have focused our work in areas where:

- there is strong evidence of need
- we can make a unique contribution
- positive change is achievable

> In everything we do, we aim to be agile, independent and authoritative.

To support this new approach, the strategic plan groups our regulatory work into three ‘pillars’. This helps us to deliver our core responsibilities while also progressing longer-term, coordinated programmes of action. This structure enables us to respond quickly to emerging issues and threats to equality and human rights.

Performance report

Pillar One: Regulating equality and human rights

Under Pillar One, we have delivered a core programme of regulation to support compliance with equality and human rights law. Our work here has focused on our statutory and core remit.

Monitoring compliance with the Public Sector Equality Duty in England, Scotland and Wales

The Public Sector Equality Duty (PSED) requires public authorities and organisations delivering public functions to promote equality across all aspects of their work, including decision making, policies, procurement, service delivery and workforce practices.

A significant focus of our work this year has been PSED monitoring among specific sectors, advising and influencing stakeholders and undertaking activities to support compliance.

Monitoring the PSED in England: our work with the NHS

We completed our PSED monitoring and improvement work with Integrated Care Boards (ICBs) in July 2025, strengthening their compliance with the specific PSED duties. This activity also enhanced capability across the sector, sharing practical insights through expert-led seminars and supporting NHS leaders to improve their focus on inequalities. Central themes included ensuring digital NHS services are accessible to all patients and equipping leaders with the tools to better address racial inequalities in maternity care.

Spotlight on success: Tackling racial inequality in maternity services

Through the work that I do in the Anti-Racism Hub, I have seen first-hand the devastating impact of racial inequity in maternity services and the power of organisations that are willing to confront it with honesty and courage. Resources like this are vital in helping services listen deeply, understand the realities facing racially marginalised women and staff, and take informed, compassionate and accountable steps towards safe, sustainable and equitable care for all.

Lisa Shoko, Equality, Diversity, Inclusion and Anti-Racism Programme Lead, Liverpool Women's NHS Foundation Trust

Monitoring the PSED in England: our work with government departments

In November 2025, we began working with government departments to better embed equality considerations at the earliest stages of policy development. This approach aims to ensure that policies better reflect diverse communities and reduce unintended inequalities.

An initial review of 15 UK ministerial departments, including HM Treasury, the Ministry of Justice and the Department for Science, Innovation and Technology, suggested that most were not demonstrating how they met their obligations under the PSED. Targeted intervention by us has led departments to consider how they can improve practice without the need for formal enforcement. For example, they are improving their equality objectives to make them more specific, measurable, and aligned with key challenges. They are also increasingly seeking support with equality impact assessments (EIAs) and using new online EIA training for civil servants.

This work has demonstrated the importance of strong senior leadership, supported by targeted training and communications for parliamentary clerks and civil servants. Departments are now expected to clearly evidence how equality is integrated into decision-making, with greater transparency on approaches and outcomes.

By identifying equality risks earlier, this work helps support effective policy design and reduces the risk of inequality.

Spotlight on success: Improving services, meeting need, maximising value for money

Even well-designed policies do not always achieve their intended outcomes. Birmingham City Council reviewed its funding programme to support local foodbanks, assessing how well it met the needs of different communities. Data analysed as part of our equality-focused review showed that some people were not able to access sufficient good quality food. The council responded by identifying barriers and introducing solutions, including improving service accessibility and addressing stigma.

Monitoring the PSED in Wales: our work with local authorities and local government

In July 2025, we wrote to all Welsh local authorities securing engagement from all councils and driving commitments to improve Equality Impact Assessments (EIAs), equality objectives, data use, engagement and expand workforce training. Targeted compliance reviews across a sample of authorities identified inconsistencies in EIA quality and practices. This work led to the development of case studies aiming to promote effective EIA practice in the Local Government sector as well as development of a councillor-focused PSED scrutiny framework to improve accountability, decision making and longer-term compliance. The case studies and framework are in development and expected to be published in summer 2026.

Monitoring the PSED in Wales: our work with Medr

We worked extensively and successfully with Medr, the new regulator of tertiary education in Wales. Their published regulatory Condition on Equality of Opportunity reflects our recommendations for an outcomes-focused, evidence-based approach to advancing equality of opportunity, with some improved alignment to existing legal duties and regulatory oversight.

Monitoring the PSED in Scotland: our work with authorities, health boards, regulators and public bodies

We completed a major cross-sector PSED compliance review covering 133 Scottish listed authorities, providing a comprehensive picture of compliance across health, local government, education and regulators. Compliance was strongest among health boards, local authorities, education authorities and other public bodies, but it was weaker in grant-aided schools and some regulators and inspectorates. On the basis of this evidence, we will use a proactive, preventative approach to help address this non-compliance, before formal enforcement becomes necessary.

Monitoring the PSED in Scotland: our work with Further and Higher Education sectors

Evidence has highlighted long-term and persistent inequalities experienced in the further and higher education sector in Scotland by students on the basis of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation. This is specifically the case in the areas of:

- student access, retention and success
- staff representation and progression
- experiences of discrimination and harassment
- mental health, wellbeing and safety

The EHRC and the Scottish Funding Council (SFC) partnered to publish **Tackling Persistent Inequalities Together** in January 2023, setting out a pilot approach to progress equality outcomes at both the sectoral and national level. In 2025, SFC published a sector summary report that demonstrated progress towards achieving National Equality Objectives (NEOs) using the approach we defined in 2023.

Spotlight on success: Tackling inequalities in Scottish further and higher education settings

Progress towards achieving NEOs is captured in a **Sector Summary Report 2025** which found that by April 2025, 39 of Scotland's 43 colleges and universities had adopted NEOs. The report also identifies a range of good practices demonstrating progress toward achieving the NEOs. These include collecting qualitative feedback from staff and students, implementing more targeted strategies, providing training and more effective monitoring of protected characteristics. It also involves ensuring that outcomes are clearly defined and measurable. For example, progress in disability inclusion can be assessed through retention rates and survey data, while improvements related to race can be evaluated by examining students' confidence in established complaints procedures, as well as levels of diversity and representation within student bodies.

It will take time for the full impact of the NEOs approach to become clear, however, two-thirds of institutions already feel that the NEOs will be effective in reducing persistent inequalities in future.

Human Rights Monitoring

National Human Rights Institutions (NHRIs) are independent, state-mandated bodies, established to protect and promote human rights domestically in compliance with international standards, such as the **UN Paris Principles**.

The EHRC is an 'A' status accredited NHRI which means we have voting rights and are able to participate in UN human rights mechanisms.

We promote the effective implementation of the seven UN human rights treaties the UK has ratified, among others. These treaties create binding obligations in international law, requiring the UK to ensure its laws and policies respect, protect and fulfil the rights they contain.

Human rights treaty reporting and implementation

The UK participates in the Universal Periodic Review (UPR), a UN Human Rights Council process that examines each UN Member State's human rights record and issues recommendations for improvement.

On Human Rights Day 2025, we released our 4th cycle UPR mid-term report, highlighting areas of progress and where further action is needed to implement selected recommendations. Our analysis found that the UK and Welsh governments have made progress in some areas, including new UK legal measures to limit workplace sexual harassment and the Welsh Government's child poverty strategy and monitoring framework.

Developing and updating our Human Rights Tracker

Our **Human Rights Tracker** (the Tracker) is an online, searchable tool for England and Wales that helps people understand the UN human rights treaties the UK has committed to and how compliance is monitored.

This year, we reviewed actions taken by the UK and Welsh governments in response to recommendations from the UN Committee on the Elimination of Racial Discrimination (CERD). We also translated more than 100 recommendations from the latest UK review under the International Covenant on Economic, Social and Cultural Rights (ICESCR) into plain English and Welsh and made them available on the Tracker. Ratified by the UK in 1976, ICESCR protects rights related to work, education, living standards, health and social security.

Engagement with civil society

As part of our role as a NHRI, we support civil society organisations in England and Wales to understand their rights under international human rights treaties and build their capacity to engage effectively with UN processes. We also encourage and safeguard their ability to advocate for change at the domestic level. Over the past year, we delivered a range of sessions, building capacity and capability to monitor international human rights. These sessions were provided to parliamentary staff in Westminster and the Senedd and officials from the UK and Welsh governments.

Spotlight on success: Supporting the application of the European Convention on Human Rights (ECHR)

In response to the UK government's plans on the European Convention on Human Rights and migration, we worked with the Scottish Human Rights Commission and Northern Irish Human Rights Commission to set out a shared position via a **joint statement**. This statement collectively asked the government to commit to no reduction in rights protections. The ECHR gives legal force to rights that belong to all of us and that we can recognise as fair and reasonable. These include our right to life, freedom from torture, right to private and family life and freedom of expression. Our governments have a legal obligation to uphold these rights.

We will continue to monitor the government's plans closely and stand ready to advise ministers on the implications for human rights protections in the UK.

Developing an evidence-led organisation

Evaluating our impact

We conducted two major evaluation projects, which applied an evidence-led approach to understanding impact.

The first of our two projects was an evaluation of the National Equality Outcomes (NEOs) approach jointly developed by the EHRC and the Scottish Funding Council (SFC). This is covered on **page 21**.

The second was research into the impacts of high-profile regulatory activity in the hospitality sector, testing whether, for example, the formal undertakings we secured from McDonald's resulted in wider business awareness and action on equality. This work will continue into 2026–27 to gather more evidence.

Our statutory reporting function: the Equality and Human Rights Monitor

The **Equality and Human Rights Monitor** and equivalent reports: 'Is Wales Fairer?' and 'Is Scotland Fairer?' form our comprehensive five-year review of how Britain is performing on equality and human rights. It examines outcomes across key areas of life including:

- education
- work
- living standards
- health
- justice
- security
- participation

In preparation for our next statutory report, we began a comprehensive review process for the **measurement framework** used to monitor equality and human rights in Britain. This has indicated opportunities to adapt the framework to new outcomes and we will engage with stakeholders in 2026–27 to test and strengthen the proposed changes.

Gender pay gap reporting

The gender pay gap (GPG) is the difference in average pay between the men and women in a workforce. Employers in the private or voluntary sectors with 250 or more employees must publish their GPG data every year. This also applies to specified public-sector employers in England and a limited number of non-devolved bodies.

In line with our statutory duty, we have continued our work to ensure compliance with GPG reporting deadlines. Following our warning notices, 10 organisations failed to meet the statutory reporting deadline of 4 April 2025. They were listed on our website and, by November 2025, we achieved a 100% success rate in GPG reporting.

Spotlight on success: Clarifying what gender pay gap actually means to small businesses

During the year, we analysed the pay gap data that companies had uploaded onto the government website so that we could identify any 'suspect' entries. Following our checks, we identified 38 smaller employers who had published inaccurate GPG information. We found significant misunderstandings about data preparation, and in some instances, we found that employers had interpreted the GPG to mean 'equal pay' and had inputted fictitious data. We ensured that all of them prepared, recalculated, and corrected their GPG data on the government website.

Insights from this evaluation have shaped our overall approach in terms of strengthening reporting compliance and improving data accuracy. In February 2026, we targeted small employers in the administrative sector, as well as banks, providing clear guidance on calculating GPG metrics.

The Fairness Innovation Challenge

In 2023, the Department for Science, Innovation and Technology (DSIT) launched the **Fairness Innovation Challenge**. This was a grant funded programme to support the development of innovative solutions to address bias and discrimination in Artificial Intelligence (AI) systems.

We worked alongside the Information Commissioner's Office to support responsible innovation and to strengthen our understanding of bias and discrimination in AI systems, while also engaging and educating technology developers on equality and human rights. Working with four challenge teams, we explored how bias, including human bias, can lead to unlawful outcomes, emphasising the need for clear objectives, careful data use, transparency and explainability.

The work demonstrated the importance of accessible communication, effective human oversight, and understanding real-world impacts. It also supports our ongoing focus on high-risk areas, improving transparency, and challenging AI uses that may conflict with equality and human rights protections.

Performance report

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

This year we have refreshed our approach and ways of working to concentrate on the most significant and urgent priorities. Pillar Two, our agile delivery pillar, has been designed to support this by enabling us to respond effectively to emerging issues, prioritise our work and make evidence-based decisions. It also ensures that the appropriate tools and levers are applied to deliver the greatest impact.

Enforcing the law

We have used our statutory legal and enforcement powers to rigorously challenge unlawful policies, practices and behaviour.

We have continued to use section 23 agreements. A section 23 agreement is a formal undertaking in which an organisation commits to addressing suspected unlawful conduct and takes steps to improve behaviour and culture.

Welsh Government section 23 agreement

We entered into a new section 23 legal agreement with the Welsh Government, to improve its compliance with equality law. Under the action plan, the Welsh Government will:

- review current procedures and guidance relating to the Public Sector Equality Duty (PSED) and Equality Impact Assessments (EIAs)
- deliver training
- improve governance of PSED compliance
- develop guidance
- implement an internal communication plan to drive cultural reform and improve knowledge of equality law requirements

The formal enforcement action comes after extensive private engagement. We initially wrote to the Welsh Government to express our concerns about PSED compliance in 2020 and continued to monitor the issue. In 2023, we held regular discussions with the Welsh Government regarding its failure to conduct and publish EIAs for many of its policies. In 2024, we recommended the Welsh Government enter into a section 23 legal agreement, which resulted in an agreement and action plan in November 2025.

The agreement is expected to conclude by November 2027.

McDonald's Restaurants Limited (McDonald's) – strengthened action plan

We entered into a section 23 agreement with McDonald's in February 2023, following concerns about the handling of sexual harassment complaints made by staff in its UK restaurants. In 2025, it was extended after serious allegations were raised after the original agreement was entered into. The extension includes a strengthened action plan to protect McDonald's staff from sexual harassment.

The plan builds on improvements and proactive initiatives already made by McDonald's. It includes actions around safeguarding, sexual harassment training, staff surveys and risk assessments. Some of these actions are being delivered to both McDonald's staff and franchisees. McDonald's are seeking commitment from franchisees to adopt appropriate policies, systems and measures to create a safe, respectful and inclusive workplace culture.

IKEA UK – concluded agreement

We entered into a section 23 agreement with IKEA UK in March 2023. This regulatory action followed a complaint about sexual harassment and assault from a former IKEA employee at a UK store and related to how the allegations were handled by IKEA UK.

Under the terms of the agreement, IKEA UK committed to reviewing the way it deals with sexual harassment to better meet its responsibilities under the Equality Act 2010. This included reviewing its policies and practices, improving its monitoring and response to complaints, providing new training and reflecting a zero-tolerance approach through communications.

We monitored delivery of the agreed action plan over two and a half years and the agreement concluded in 2025. We were content that IKEA UK met the terms of the agreement and will continue to build and improve upon the ways of working implemented as part of the agreement.

Lidl GB (Lidl Great Britain Limited) – concluded agreement

In August 2025, we signed a section 23 agreement with Lidl to prevent sexual harassment in the workplace. This happened after an employment tribunal found in 2023 that Lidl GB had failed to take all reasonable steps to prevent the sexual harassment of a young female employee by a staff member between 2019 and 2021.

Under the agreement, Lidl implemented a series of measures to prevent sexual harassment in the workplace. One measure was to engage with existing diversity, equality and inclusion groups to discuss potential risks. As part of the agreement, Lidl committed to conduct a staff survey relating to sexual harassment to identify concerns and determine whether further preventative action was required.

After formally monitoring the action plan, we were satisfied with the actions that Lidl had implemented to prevent sexual harassment in the workplace and concluded the agreement.

Spotlight on success: Using our enforcement powers

Our work with the EHRC on the action plan has been constructive and productive, supported by practical advice, suggestions and insight. The collaborative working relationship and helpful feedback encouraged open reflection and the additional actions the EHRC recommended helped enhance the sexual harassment protections in place across the business.

Lidl

Live Nation (Music) UK Ltd – concluded agreement

We entered into a section 23 agreement with Live Nation, on behalf of itself and its festival operator Festival Republic in November 2023 following media reports of accessibility issues at Wireless Festival in 2022 and Download Festival in 2023. Disabled festival goers reported problems with being able to see the stage, a lack of accessible toilets and event staff who questioned their disabilities.

Over the two-year monitoring period, a range of accessibility improvements have been implemented for disabled participants. These include enhanced policy, guidance and accessibility information, mystery shopper systems, improved accessible facilities onsite and better customer care.

Pontins – concluded action plan following investigation

In February 2024, we published an **investigation into Pontins holiday parks** and served them with an unlawful act notice. Our investigation uncovered company systems and practices aimed at barring Irish Travellers from their holiday parks between 2013 and 2018.

Our investigation found 11 unlawful acts which discriminated against Irish Travellers. Pontins was required to agree an action plan which introduced a zero-tolerance approach to discrimination. This included issuing an apology to the Gypsy, Roma and Traveller community and the removal of the electoral roll terms with a commitment to not reintroduce the term. It also included actions around monitoring of booking policies, the introduction of safeguards in systems and processes, a whistleblower action plan and engagement with Gypsy, Roma and Traveller communities.

We monitored the implementation of the action plan and were satisfied that Pontins had complied with the requirements of the plan.

There is some evidence of a wider impact resulting from the Pontins investigation, such as a reduction of complaints about suspicious booking refusals within the holiday sector as a whole.

Our investigation and assessment of the Department for Work and Pensions (DWP)

We progressed our investigation into whether the Secretary of State for Work and Pensions, or their employees or agents, have broken equality law. We launched this investigation in 2024 as we suspected that the DWP may have failed to anticipate and make reasonable adjustments for disabled people with a mental impairment while making health assessment determinations.

We also progressed our assessment of the Secretary of State for Work and Pensions' compliance with the PSED when developing, implementing and monitoring policy guidance relevant to health assessment determinations.

Further detail on our investigation and assessment is contained in the **Terms of Reference.** We will publish a report of our findings in due course.

Litigating strategically to protect equalities and human rights

Under the Equality Act 2006, we have three main litigation powers. We can provide legal assistance, bring proceedings in our own name or intervene in legal cases brought by others. We can also seek judicial review if a public body acts unlawfully under the Equality Act 2010 or Human Rights Act 1998.

Below are two notable examples of our intervention work in 2025—2026.

EHRC intervention regarding the use of live facial recognition technology by the Metropolitan Police Service

In January 2026, the judicial review claim, The King (on the application of Thompson and another) v Commissioner of Police of the Metropolis was heard. It examined whether the Metropolitan Police Service's Live Facial Recognition (LFRT) policy complies with Articles 8, 10 and 11 of the European Convention on Human Rights. We were granted permission to intervene through written submissions. While recognising that LFRT may assist in tackling serious crime, we emphasised the need for clear rules and safeguards to ensure its use is necessary, proportionate, and compatible with human rights.

While the legal challenge was ultimately dismissed, our intervention nonetheless served to underline the human rights risks, potential societal consequences and the need for adequate safeguards in the context of a fast-moving and evolving technology. It also reinforced our role as an important stakeholder in the human rights debate on LFRT. It placed our concerns and evidence on the judicial record, ensured visibility of our position, and helped to identify where future challenges—particularly on necessity and proportionality—may be more effectively focused.

The use of PAVA spray in children's prisons

The EHRC intervened in a judicial review brought by the Howard League for Penal Reform against the Ministry of Justice concerning the rollout of PAVA (an incapacitant spray) in children's prisons. The intervention focused on failures to comply with the Public Sector Equality Duty, highlighting that prior equality concerns in adult prisons were not adequately considered before extending PAVA use to children. Although the claim was unsuccessful, the intervention was welcomed by the court and parties, ensured equality and children's rights considerations were clearly on the record and reinforced our status as an expert contributor on the application of the PSED.

Activity to improve Equality Act compliance

We identify barriers to good practice and compliance with the Equality Act, using this intelligence to inform targeted interventions aligned with our strategic aims. Through these interventions, we engage with public and private sector organisations, provide advice, guidance and training, implement our PSED strategy and collaborate with regulators, inspectorates and ombudspeople. This work helps duty-bearers to comply with the law, supports individuals to enforce their rights and enables oversight bodies to drive improved compliance through their own activities.

We worked collaboratively with the Children and Young People's Commission for Scotland and Scottish Human Rights Commission to highlight the equality and human rights concerns around the potential introduction of live facial recognition technology by Police Scotland.

We wrote to an NHS trust in England, seeking assurances that the PSED had been complied with when making changes to delivery of dementia care services. The NHS trust provided evidence of steps taken to comply with the requirements of the PSED.

We wrote to a national pub chain highlighting the requirement to make reasonable adjustments under the Equality Act 2010. We referred them to our guidance on Assistance Dogs.

We provided feedback on the Government Data Ethics Framework, clarifying the links to the PSED and Equality Act 2010 requirements, as well as our guidance.

We worked with the Health Services Safety Investigations Body reports to help drive improved compliance across health services, supporting them to make relevant links to the Equality Act and Human Rights Act in their regulatory reviews.

We worked with the Care Quality Commission (CQC) and the Association of Directors of Adult Social Services (ADASS) in England to identify ways of addressing barriers to local authorities complying with the PSED when delivering social care services.

We presented our AI procurement guidance at the Procurement Live event in October, alongside the Local Government Association. This was an opportunity to disseminate our guidance and drive compliance amongst local authority procurement specialists.

Updating the code of practice for services, public functions and associations

The code of practice for services, public functions and associations (the Code) covers discrimination in services and public functions as set out in Part 3 of the Equality Act 2010, and discrimination by associations.

Part 3 is based on the principle that individuals must not face discrimination on the basis of protected characteristics when accessing services, whether those services are public or private and regardless of whether they are free or paid for.

Updating the Code forms a core part of our statutory duties and ensures that duty bearers have access to clear, authoritative guidance to support compliance and lawful practice.

In April 2025, the Supreme Court issued its judgment in For Women Scotland Ltd v The Scottish Ministers, which clarified the legal meaning of the term 'sex', 'man' and 'woman' for the purposes of applying the Equality Act 2010.

We are the regulator of the Act. We do not make the law, but it is our job to ensure that it is followed. Therefore, following the Supreme Court's judgment, we issued an interim update to clarify the legal effect of the judgment and explain the practical implications for organisations.

Although updates to the Code were at an advanced stage, we were required to make further and immediate revisions to incorporate the Supreme Court's ruling on the definition of 'sex' into our guidance and explain how duty-bearers must put it into practice.

We launched a consultation on the updates required in May 2025. At the end of the 6-week consultation period, we had received more than 50,000 responses from a wide range of organisations, legal professionals and individuals from across England, Scotland and Wales.

After the consultation period closed, the responses were analysed using supervised machine learning. Using this method, we identified main themes and actionable points and used them to directly inform the drafting process. We analysed every response where respondents indicated that they wanted to provide feedback as part of the consultation.

We finalised the revised sections and submitted the updated Code to the Minister for Women and Equalities for review on 4 September 2025.

The work to update the Code took place in a complex and sensitive environment with high levels of public and stakeholder scrutiny, evidenced by the volume of correspondence received on the issue and extensive media interest.

Legal challenges

This was a high-profile and closely scrutinised programme of work, and we were subject to two significant legal challenges during this time.

The first related to the lawfulness of the interim update we issued shortly after the Supreme Court's judgment. The High Court dismissed this challenge, finding that we had acted lawfully and in line with our statutory duties.

The second attempted to challenge the length of the consultation period as insufficient. However, the High Court dismissed this challenge, and the Court of Appeal upheld this decision, finding the consultation process lawful.

Organisational impact

The complex and far-reaching nature of this work required difficult prioritisation and redeployment decisions across our broad remit. It placed significant pressure on teams who were responding to increased demand across corporate functions, including defending legal challenges, managing unprecedented volumes of correspondence and freedom of information requests, and addressing incidents of criminal damage at two of our office locations.

Although we prioritised and absorbed additional costs where possible, the predicted financial impact was in excess of our delegated budget, and on this basis, we were granted financial support from Cabinet Office.

Our response demonstrated our ability to deliver high-quality outcomes despite conflicting demands and reinforced our position as an agile, independent and authoritative regulator. This was driven by strong teamwork and collaboration, professional commitment and adaptability, qualities that are consistently recognised across the organisation as fundamental to successful delivery.

Helping schools to understand the Equality Act

Our technical guidance for schools explains the obligations and sets out the requirements of the Equality Act 2010 as they apply to schools, particularly regarding the delivery of education and access to both educational and non-educational benefits, facilities, and services.

It is intended for a wide audience, including school staff, legal professionals, advocates, courts, tribunals and anyone needing a thorough understanding of the law or its practical application.

First published in 2014, the guidance was reviewed and updated in 2023 and 2024 to ensure that its references to the protected characteristics of sex and gender reassignment reflect developments in this complex area of law and policy. These areas continue to evolve.

We have updated the guidance to reflect developments in law and policy, including new case law. We launched a public consultation in June 2026, supporting engagement with school leaders and other stakeholders to strengthen clarity, usability and practical impact, and ensure the final guidance effectively supports compliance and good practice in schools.

Influencing and advising

A significant aspect of our work is to protect and promote equality and human rights. We raise awareness, build understanding, and advocate for the protection of these rights by advising and influencing governments and lawmakers to do the same. Our aim is to achieve outcomes rooted in dignity and fairness, contributing to lasting positive change across society.

During the year, we have continued to deliver across a broad and complex agenda, responding to UK government consultations across a range of issues, advising on bills and engaging extensively with government departments and with parliamentarians across our three nations.

UK and Westminster influencing

We have an explicit statutory power to advise Parliament, Ministers and government departments. We responded to six UK government consultations and calls for evidence on:

- equality law
- the use of restraint in schools
- proposals for mandatory ethnicity and disability pay gap reporting
- a definition for anti-Muslim hatred
- an independent review of public order and hate crime legislation
- a new legal framework for law enforcement use of biometrics, facial recognition and similar technologies

We also provided advice on several bills in Westminster, including on the Terminally Ill Adults (End of Life) Bill, the Crime and Policing Bill and the Railways Bill. Our advice includes briefings to Parliamentarians and written and oral evidence to Westminster Parliamentary select committees. In addition, we provided evidence to the Joint Committee on Human Rights on their inquiry into human rights and the regulation of artificial intelligence.

We have engaged with UK government departments on a wide range of areas of policy, including new proposals on immigration and asylum, equal pay reform and pay gap reporting and plans for implementation of the socio-economic duty in England.

Scotland policy influencing

We have successfully influenced important pieces of legislation in Scotland to better meet the needs of protected characteristic groups. This included the Care Reform (Scotland) Act 2025, which reflects recommendations we made around the need for independent advocacy and rights to visits for care home residents.

We provided advice on the Education (Scotland) Act, which contains provisions to ensure charters reflect the needs of protected characteristic groups.

While the Assisted Dying for Terminally Ill Adults (Scotland) Bill did not pass at Stage 3, we informed the Scottish Parliament debate on issues relating to capacity, coercion, minimum age and more.

We provided evidence to the Scottish Parliament Finance and Public Administration Committee's inquiry into the Scottish Budget setting process.

Our concerns about the availability of data on how the budget affects different groups on the basis of their protected characteristics, and the lack of coherence in how government outcomes are set and measured, were reflected in the final report.

We have worked closely in particular with the Equalities, Human Rights and Civil Justice Committee, including giving formal evidence, to inform their thinking and recommendations to the Scottish Government on the operation of the PSED in Scotland. We continue to advise the Scottish Government on improvements to the Scottish Specific Duties (SSDs) to help address inequalities in Scotland.

Spotlight on success: From guidance to requirement: Mandating the Mainstreaming Toolkit

We supported the Scottish Government in developing its Equality and Human Rights Mainstreaming Toolkit. The toolkit incorporates recommendations we have provided to strengthen the Scottish Specific Duties, particularly highlighting the importance of building capacity and fostering a supportive culture within public bodies. In December 2025, the Minister for Equalities used her power under Regulation 11 of the Scottish Specific Duties for the first time to require listed bodies to consider the toolkit when carrying out its duties under the regulations. Early feedback from the Scottish Government is that many public authorities are now using the tool to assess their work in the context of the Scottish Specific Duties.

Spotlight on success: Our role in advising on the assisted dying bills across three nations

We briefed the UK Parliament on the Terminally Ill Adults (End of Life) Bill, and the Senedd on its implications for Wales, as well as the Scottish Parliament on the Assisted Dying for Terminally Ill Adults (Scotland) Bill. Commissioner Alasdair Henderson also gave evidence to the relevant House of Lords bill committee in October and our work was frequently cited during the relevant debates in the House of Lords, while our briefing in Scotland resulted in amendments to the legislation on stronger eligibility criteria and access to independent advocacy. Though neither bill passed, our advice reinforced our role as an expert adviser to legislators on the most difficult and sensitive equality and human rights issues they address.

Wales policy influencing

In 2025–26, we responded to a number of high-profile Welsh Government consultations, including consultations or calls for evidence on:

- accommodation for Gypsies and Travellers
- guidance for schools on anti-bullying
- the draft Disabled People's Rights Plan
- reforms of fire and rescue services
- the government's statistical and data output

We provided written advice on two bills in the Senedd. We submitted a **Stage 1 briefing** on the Bus Services (Wales) Bill to advise on the need to further embed equality and accessibility requirements into the bill.

We also provided advice to the Senedd on the British Sign Language (Wales) Bill, welcoming the bill's intentions and suggesting consideration be given to oversight and accountability mechanisms.

Our advice strengthened Welsh Government guidance to local authorities on the management and design of the Gypsy and Traveller sites. We recommended that the guidance should take a human rights approach and reflect Convention rights, such as the right to adequate housing and the right for every child to be heard. We also advised that using a human rights approach would help the Welsh Government to meet concluding observations from the UN CERD on the provision of sites.

We recommended that the commitments to collaboration and consultation with Gypsy, Roma and Traveller communities should go further. While the guidance has not been published yet, Welsh Government officials confirmed the guidance will include a greater focus on collaboration.

The Welsh Government's statutory framework for youth work, published in June 2025, has been strengthened following our advice in 2024. The published framework includes a new section on 'Championing equality and diversity in youth work provision', referencing local authorities' obligations under the PSED, which reflects the concerns we raised in our consultation response.

Spotlight on success: Our role in shaping the Welsh Government's final Disabled People's Rights Plan

We welcomed the inclusion of several of our recommendations in the Welsh Government's final Disabled People's Rights Plan, published at the end of 2025. In our response to the draft, we called for clear targets, defined timeframes and stronger accountability, as well as ongoing co-production with disabled people—particularly in employment, education and transport. The final plan reflects our advice, with stronger links to human rights, a clear commitment to co-production and an improved approach to data.

I am incredibly grateful for the invaluable work of EHRC Wales and which is so well reflected in their Impact Report. I want to thank the Commission in Wales for their continued leadership and commitment to equality and human rights in Wales.

Jane Hutt MS, Cabinet Secretary for Social Justice, Trefnydd and Chief Whip, Written Statement 3 February 2026

We have valued our constructive relationship with the Equality and Human Rights Commission during the course of this Senedd.

Equality and Social Justice Committee, Senedd Cymru, Legacy Report 27 March 2026

Performance report

Pillar Three: Coordinated programmes of action focused on entrenched and complex equality and human rights challenges

Pillar Three is designed to deliver targeted, longer-term and coordinated programmes, focusing on complex and longstanding equality and human rights challenges and using a range of regulatory tools to address these well-established challenges.

Each programme under Pillar Three addresses a specific issue.

- **Programme One** focuses on tackling harassment, discrimination and victimisation in the uniformed services.
- **Programme Two** covers clarifying the law and supporting effective responses to balance of rights, including freedom of expression.
- **Programme Three** aims to strengthen participation in society by addressing barriers to public services.

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

This programme aims to support employers and regulators of uniformed services to start delivering changes to address sex and race-based discrimination, harassment and victimisation within the police, fire and rescue services and armed forces.

Launched in 2024, this programme takes a coordinated approach to advancing equality, strengthening collaboration, and supporting these services to meet their equality duties. The programme has six activities which draw on the full range of our powers and levers.

Developing effective relationships

We have developed influential relationships with regulators, inspectorates, ombudsman and other professional associations within policing and fire services. They are actively engaging with us through reciprocal advisory relationships on critical guidance and policy matters. This collaborative approach is a clear indicator of our expanding influence and demonstrates the effectiveness of our strategic efforts to build trust and credibility within these professional communities.

Equality exchange and networking events

We organised and held two equality exchange events, which brought together services from across police, fire and armed forces. The events focused on practical tools and initiatives for preventing race and sex-based discrimination. During the events, services exchanged ideas and best practice. Attendees were updated on the latest initiatives taking place at a national level and within staff networks.

Uniformed services delegates left the events with new ideas and inspiration. Most survey participants agreed or strongly agreed that the events allowed them to meet and discuss issues with others working in the sector.

Our work with Police Scotland and the Scottish Police Authority

We held detailed discussions with senior and operational staff at Police Scotland and the Scottish Police Authority (SPA) to understand their support needs. We have identified draft objectives, outputs and outcomes to form the basis of an action plan to be delivered by September 2026. Our expert feedback led Police Scotland and the SPA to revise their equality outcomes to be more specific and measurable.

Our work with the Fire and Rescue Services across our three nations

We developed and circulated a survey to all Fire and Rescue Services (FRS) in England, Scotland and Wales to assess their compliance with the sexual harassment preventative duty. We presented to Chief Fire Officers and Strategic People Leads Forum of the National Fire Chiefs Council to secure buy-in and achieve a high return rate. Using the findings of the survey, we designed a package of support for all FRS across the three nations. This consists of:

- peer-to-peer learning sessions
- a series of webinars on how to comply with the sexual harassment preventative duty
- case studies
- a roundtable, to be delivered later in 2026

We have undertaken the first round of peer-to-peer learning sessions. These have received highly positive feedback, including that one participant had 'thoroughly enjoyed it and taken lots away', another found it 'really eye opening' and many participants commenting that they were very positive sessions.

In 2025–26, we responded to two Welsh Government consultations on reform of Fire and Rescue Services in Wales: **reform of fire and rescue authorities in Wales 2025** and the **2026 Fire and Rescue National Framework for Wales**. Several of our recommendations on governance and accountability are reflected in secondary legislation, while the final framework recognises workforce culture issues and increased use of equality data.

Spotlight on success: Helping organisations improve their equality data

In September 2025, we published guidance on collecting and analysing equality data for the uniformed services sector. It was the first guidance of its kind to be published by a regulator while also being co-designed with members of the sector.

The aim of the guidance was to help the armed forces, police and fire and rescue services improve how they collect and analyse equality data to tackle harassment and discrimination. It is intended to support leaders in driving cultural change, improving legal compliance, and use data to develop targeted policies, creating safer and more inclusive workplaces. Better quality data is also expected to enhance recruitment and retention and strengthen organisations' reputations as inclusive employers.

Since its launch, influential external stakeholders, including the National Fire Chiefs Council, the National Police Chiefs Council and the College of Policing have endorsed and disseminated this guidance. It has secured 139 media mentions – 93% of which were positive. This demonstrates successful reach of the specific target audience.

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

Our role includes clarifying the law and advising on how it can be shaped in a way that respects everyone's rights. In line with our 2025 to 2028 strategic aims, we act as an authoritative and impartial voice focusing on complex and longstanding equality and human rights challenges.

Given the sensitive nature of this work, we have spent time conducting careful and detailed scoping to understand the evidence of need, the prospect for impact and our unique role. This exercise has revealed some prominent areas of tension in relation to freedom of expression in the workplace.

Cases such as Higgs v Farmor's School and Miller v University of Bristol evidence areas of tension in the workplace where freedom of expression intersects with protected beliefs and other protected characteristics. They demonstrate the challenge of balancing an individual's right to hold and express lawful beliefs with the need to protect colleagues and service users from potential discrimination, harassment, or harm linked to other protected characteristics. These cases underline the importance of carefully navigating competing rights to ensure that neither freedom of expression nor equality protections are applied in a way that undermines the other.

As this is a challenging area of case law, employers are likely to require support in navigating these difficult issues, including the sometimes competing and interacting rights of employees, as well as responding proportionately to third-party complaints and, in future, preventing third-party harassment. We could add significant value in assisting employers to understand and comply with the law in this area, with a view to reducing litigation while also promoting the benefits of human rights and the protections set out in the Equality Act 2010.

Programme Three: Strengthening active participation in society by addressing barriers to public services

We developed a programme of work on access to public transport for older and disabled people across Great Britain. Learning from evidence, conversations with organisations working to improve equal access to transport and our previous work, we identified persistent barriers that limit access to essential services and undermine a range of rights, including healthcare, education, employment, and family life.

We focused on bus and rail travel and structured the programme around three themes.

Influencing legislation and policy to improve coherence to accessibility requirements

We developed guiding principles for accessible transport in England and Wales and strengthened our influence on transport policy through targeted engagement with governments and regulators. Our advice to the Welsh Government on the Bus Services (Wales) Bill promoted clearer duties on equality and accessibility, and our input into the Travel for All action plan helped secure improvements to data on accessible transport. Transport Scotland has engaged us to support the next phase of its Accessible Travel Framework.

Convening partners to support joined-up working

We began engaging with regulators and oversight bodies to lay the groundwork for future partnering events. As the regulator for equality and human rights, we have a unique role to bring together organisations to support the sharing of good practice in this area.

Strengthening compliance and accountability

We monitored PSED compliance among relevant organisations to inform future action and considered potential strategic legal interventions. We also engaged with Network Rail on improvement works at Oxford station, influencing further changes to improve access for disabled and older users and local residents.

Spotlight on success: Working with our transport providers

The Equality and Human Rights Commission's engagement provided valued input and constructive challenge during the project, particularly in relation to our equality planning and Disability Impact Assessments. Their practical approach included visiting sites to understand the impacts first-hand. This supported open discussions and helped strengthen our approach with stakeholders. The EHRC also prompted us to consider a wider range of affected users, beyond those with reduced mobility, including neurodivergent user groups, which informed further improvements. Overall, the engagement felt constructive and focused on improving outcomes.

Network Rail

Performance report

Our change programme

Our 2025–28 strategic plan made a commitment to strengthen our organisation through continued investment in our management and leadership capability, the review and improvement of our systems and tools and the effective use of our office space. Together, these measures are intended to ensure our people are well equipped to deliver their roles effectively.

Our change programme was initiated in 2024–25 and progressed into the delivery phase in 2025–26. The programme sets the direction for our corporate improvement activity.

Our ambition is to be one organisation, with one shared purpose, focusing our expertise where the evidence shows it matters most, ensuring we operate as an effective regulator within our financial constraints.

We will achieve this ambition by working differently, managing and prioritising rigorously, deploying resources flexibly and working more consistently across the organisation. We also aim to create an environment where our workforce can deliver to the best of its abilities and where we are an employer of choice.

In the initial phase, we set out a case for change, the design principles and high-level operating model to ensure we:

- meet our statutory duties and our role as a National Human Rights Institution
- deploy the right people and skills quickly, with a clear focus on delivery and impact
- make decisions and set priorities quickly, so our resource is focused on where we can have the greatest impact
- strengthen our ability to gather and use insight and data, so decisions and actions are underpinned by evidence

- work together effectively across the organisation, with clear accountability and stronger collective ownership
- have a clear and consistent but adaptable framework to deliver work, supported by appropriate processes, technology, and a focus on continuous improvement
- support a positive, inclusive working environment with clear accountabilities, the skills we need and a culture that enables us to work well together

In February 2026, we launched a voluntary exit scheme to help us manage staffing costs responsibly and create flexibility to shape the workforce required to deliver our future operating model.

In March 2026, we launched an early consultation on a proposed operating model and high-level structure, seeking feedback on the high-level design from colleagues and Trade Unions.

In the 2026–27 financial year, we will finalise a new organisational structure and operating model, ahead of implementation in 2027–28.

Leadership and management development

In 2025–26, we continued to strengthen leadership and management capability across the organisation. We supported senior managers to build leadership confidence and develop a strong pipeline for future senior roles. We built on the success in 2024–25 and continued to offer the Aspiring Managers programme for colleagues preparing to take on management responsibilities.

To support leadership development, we coordinated targeted learning, including development on leading through change and uncertainty. This investment continues to strengthen leadership capability and shape a positive organisational culture. We continued our commitment to offer a broad programme of learning to support colleagues' skills, wellbeing and professional development. This work has strengthened our organisational foundations and helped create an environment in which our people can thrive and deliver effectively and efficiently.

Modernising and investing in our technology

During 2025–26, we completed our technology refresh to support effective hybrid working. We completed the migration of business-critical email and records management systems to a cloud-based technology, which further reduced reliance on legacy infrastructure. We also introduced additional measures to improve and automate the retention and management of electronic records.

We continue the ongoing work to strengthen our cyber security risk management and reporting framework, taking targeted action to mitigate specific risks while promoting awareness of good practice across the organisation. This included enhancing access controls, user authentication processes, and strengthening monitoring arrangements. We delivered cyber security training across the organisation focusing on phishing awareness.

We launched a modern, user-friendly and accessible intranet. The platform has been built around the needs of our people, giving colleagues improved access to the information and tools they need to do their jobs effectively. This has improved how our organisation shares knowledge and communicates internally and provides a sustainable platform we can continue to develop.

Effective use of our offices

We have continued to improve the working environment in our offices during the year, although our focus has been diverted to prioritise security and the safety of our employees. Two of our offices were subject to criminal damage due to heightened tensions following the Supreme Court judgment in For Women Scotland Ltd v The Scottish Ministers.

The licence for our temporary London office ended in January 2026. This provided an opportunity to relocate from central London to more suitable premises. We have identified premises that meet our requirements and have entered into a licence agreement effective from 1 April 2026.

Performance report

Equality objectives

Equality Objective One: We will promote equality and tackle discrimination by achieving the priorities set out in our strategic plan

All of the activities outlined in this annual report demonstrate our progress toward Equality Objective One, as each contributes directly to promoting equality and tackling discrimination. Together, this work shows how we are delivering the priorities set out in our strategic plan.

Equality Objective Two: We will seek to address under-representation of people with different protected characteristics in the Equality and Human Rights Commission, including at senior levels

We continued to take action to support workforce diversity and inclusion through learning, recruitment practice and people policies. We are a Disability Confident Leader employer.

We are proud of the diversity of our workforce which meets, or exceeds, the UK Working Population in most protected groups, demonstrated on **pages 61 to 62**.

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

In 2025–26, we designed and implemented a centralised decision-making process to ensure we are prioritising our agile work carefully to address the most significant and urgent threats to equality and human rights. We take action where there is clear evidence of need by integrating a strategic evidence assessment.

Performance report

Our business

As Britain's equality regulator, we engage with stakeholders and governments across England, Scotland and Wales as part of our work.

Manchester remains our head office; our Cardiff and Glasgow offices support regional and corporate functions. We had access to temporary space in London from April 2025 to January 2026 and have signed an agreement to license office space in London from 1 April 2026.

Financial Performance

At the start of 2025–26, our delegated resource departmental expenditure limit (RDEL), excluding depreciation, was £17.157 million (2024–25: £17.500 million).

The resource outturn for 2025–26 (excluding depreciation and provisions) was £17.816 million against a budget of £17.157 million, resulting in a pressure of £0.659 million.

In advance of the in-year pressure materialising and recognising the challenges of absorbing financial pressures within our limited budget, we agreed financial support from the Cabinet Office. Approval was granted for additional budget cover due to:

- the financial impact arising from the Supreme Court judgment in For Women Scotland Ltd v The Scottish Ministers; this was not anticipated, and additional budget of £0.900 million was approved, of which £0.655 million was spent

- our internal change programme commenced in 2024–25, which required team resource and investment in technology projects, for which additional budget of £0.400 million was approved and £0.329 million was spent

Our delegated capital departmental expenditure limit (CDEL) for 2025–26 was £0.500 million (2024–25: £0.500 million). At mid-year, this was reduced to £0.300 million. Total capital outturn in-year was £0.078 million, relating to office improvements and a computer hardware refresh.

Net operating expenditure summary

This table compares our RDEL net operating expenditure (excluding depreciation and provision costs) and CDEL expenditure for the financial years 2025–26 and 2024–25 (figures in brackets () represent a reduction in expenditure).

	2025–26	2024–25	Change
	£000	£000	£000
Staff, Board and Committee costs	13,885	13,825	60
Staff costs Supreme Court judgment	10	–	10
Staff costs change programme	174	–	174
Total Staff, Board and Committee costs	**14,069**	**13,825**	**244**
Corporate costs	2,578	2,909	(331)
External expenditure	369	534	(165)
Supreme Court judgment	645	–	645
Change programme	155	–	155
RDEL Total	**17,816**	**17,268**	**548**
CDEL Total	**78**	**240**	**(162)**

Total expenditure in 2025–26 across all activities, including the work to support our response to the Supreme Court judgment and our internal change programme, was £17.816 million.

Corporate costs consist of expenditure on items which support the operational running of the organisation. This includes internal and external IT, Finance and HR systems and services, premises, learning and development and audit costs.

External expenditure includes legal litigation and enforcement counsel, translation services, developing our evaluation strategy, website enhancements and publication design.

This table provides a reconciliation of expenditure to the financial statements.

£000	2025–26	2024–25	2023–24	2022–23	2021–22
Staff and Commissioner Costs	14,069	13,825	14,688	14,156	12,199
Purchase of goods & services*	3,780	3,474	3,147	3,560	4,649
Income	(33)	(31)	(28)	(125)	(145)
Total	**17,816**	**17,268**	**17,807**	**17,591**	**16,703**
The items below which form part of the reported Net operating expenditure have been excluded from the above long term expenditure trend.					
Depreciation	566	699	916	912	601
Pension payments	(108)	(113)	(115)	(105)	(141)
Provisions	1,651	(23)	103	(169)	204
Net operating expenditure per SoCNE	**19,925**	**17,831**	**18,711**	**18,229**	**17,367**

** Purchase of goods and services includes pensions payments made.*

Statement of Financial Position (SoFP)

The Statement of Financial Position (SoFP) shows total net liabilities of £2.7 million at 31 March 2026 (£1.2 million at 31 March 2025). This represents an increase of £1.5 million.

This increase is primarily caused by the recognition of a provision within the current liabilities of £1.637 million in respect of a voluntary exit scheme agreed in 2025–26. The exit scheme is expected to be settled in 2026–27.

Non-current assets decreased by £0.45 million to £1.29 million (in 2024–25 this was £1.74 million). There were no significant capital additions during 2025–26 and assets continue to be depreciated in line with their expected useful lives.

Current assets increased to £0.9 million (in 2024–25, this was £0.6 million). The change reflects an increase in cash balances of £0.467 million and a reduction in trade receivables of £0.137 million. As the EHRC is primarily funded through grant-in-aid, it does not need to maintain significant cash reserves beyond operational requirements.

Total liabilities have increased by £1.4 million, mainly due to the provision noted for exit costs. The increase was partially offset by a reduction in liabilities relating to lease obligations and the reduction in the estimated cost of the legacy pension scheme.

Capital Structure

Our capital structure is shown as taxpayers' equity in our financial statements.

Funding is received as grant-in-aid 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 obligations and to pay our creditors promptly. We ended the financial year with a cash balance of £646,000 (in 2024–25, this was £179,000). The Statement of Financial Position and the Statement of Changes in Taxpayers' Equity in the statement of accounts provide additional information.

Value for money

We have sought to deliver in-house where feasible, using our resource flexibly and efficiently to maximise value for money.

Procurement supports this approach by ensuring that, where external provision is required, goods and services are sourced through robust, competitive processes that balance cost, quality, and long-term value.

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 maintained a strong focus on cost control, including implementing strict recruitment controls during 2025–26 to manage staff costs, while continuing to seek efficiencies through internal delivery.

Our change programme activity will ensure that we can deliver the best outcomes for the public within our anticipated baseline budget.

Payment of suppliers

We follow the UK government's prompt payment guidance to ensure that suppliers are paid quickly. 94.6% of all invoices received were settled within five working days (compared with 90.8% in 2024–25) and 99.8% of undisputed invoices were paid within the target of 30 days (compared with 99.6% in 2024–25).

Our people

During 2025–26, employee turnover decreased. As of 31 March 2026, voluntary turnover was 9.0%, (13.1% at 31 March 2025). Turnover remained consistently lower than in 2024–25 and showed a steady downward trend from December 2024.

We continued to use an external provider to conduct exit interviews during 2025–26. This helped improve participation and provided richer feedback on colleagues' reasons for leaving, as well as their experience of our working environment, culture and relationships at work. Most people who leave the EHRC do so to take promotion opportunities elsewhere in the Civil Service. While we are sorry to lose talented colleagues, we recognise that, as a small organisation, the wider Civil Service can offer broader career opportunities. At the same time, we remain committed to investing in and developing our people, including helping colleagues to identify the opportunities available to build and progress their careers within the EHRC.

We also continued to manage workforce numbers carefully throughout the year to ensure that our staffing profile remained sustainable and affordable. As of 31 March 2026, we employed 186 people, representing 176.14 full-time equivalent staff. This was a reduction of 13.05 full-time equivalents compared with 31 March 2025.

Our sickness absence rate decreased by 1.4 days in 2025–26. In 2025–26, average working days lost per employee was 6.9 days (8.3 days in 2024–25). This improvement was mainly due to reductions in long-term sickness absence, including mental health-related absence. During 2024–25, we strengthened our approach to managing sickness absence by introducing targeted training for managers, alongside ongoing coaching and support.

Our pay gaps

Pay gaps compare differences in gross hourly earnings between groups, based on salaries paid directly to employees. The figures in this table are based on a snapshot date of 31 March 2025 and are shown alongside the equivalent figures for 31 March 2024.

A negative pay gap means that average hourly pay is higher for the comparator group that would typically be shown as lower paid. For example, a negative gender pay gap means that women's average hourly pay was higher than men's.

The median pay gap represents the midpoint of hourly earnings and is generally less affected by unusually high or low values. The mean pay gap reflects average hourly earnings.

	Median %		Mean %	
Snapshot date	**31 March 2025**	**31 March 2024**	**31 March 2025**	**31 March 2024**
Gender pay gap	0	0.2	−0.8	2.8
Ethnicity pay gap	0.3	−0.2	5.9	1.4
Disability pay gap	0.3	0.4	7.6	9.8

Pay gaps on 31 March 2025

As of 31 March 2025, median pay gaps across gender, ethnicity and disability remained small, indicating broadly equal pay at the midpoint across these groups. The mean gender pay gap improved, with women's average hourly pay marginally higher than men's, and the mean disability pay gap also reduced compared with the previous year. The mean ethnicity pay gap increased, indicating that further progress is needed, particularly in relation to progression and representation across pay levels.

These outcomes reflect a range of factors, including workforce composition, the distribution of colleagues across pay bands, and the impact of allowances and bonus arrangements. Further detail on these figures, including bonus gaps and the actions we are taking, is set out in our published pay gap report.

Workforce diversity

The tables in this section show our workforce profile as of 31 March 2026 alongside comparative figures for 31 March 2025. Overall, the data shows a diverse workforce, with strong representation in some areas, including among ethnic minority colleagues and disabled colleagues, while representation remains mixed across other groups.

The proportion of colleagues from ethnic minority backgrounds increased from 23% to 26%, and the proportion of colleagues who declared a disability increased from 21% to 24%. The proportion of female colleagues remained high at 65%, although slightly lower than the previous year's figure of 67%.

Changes in workforce diversity over time can reflect a range of factors, including recruitment, turnover, progression and declaration rates. We continue to encourage colleagues to complete and update their diversity information so that we can better understand the composition of our workforce and use this information to inform our equality, diversity and inclusion activity.

Characteristic	31 March 2026	31 March 2025	Change
Ethnicity			
Ethnic minority	26%	23%	+3%
White British	70%	72%	−2%
Prefer not to say / not declared	4%	5%	−1%
Sex			
Female	65%	67%	−2%
Male	35%	33%	+2%
Prefer not to say / not declared	–	–	–
Marital status			
Married or in a civil partnership	44%	42%	+2%
Not married or in a civil partnership	40%	40%	–
Prefer not to say / not declared	16%	18%	−2%
Religion or belief			
Religion or belief	34%	34%	–
No religion or belief	55%	54%	+1%
Prefer not to say / not declared	11%	12%	−1%
Disability			
No	67%	69%	−2%
Yes	24%	21%	+3%
Prefer not to say / not declared	9%	10%	−1%
Sexual orientation			
Lesbian, gay, bisexual, other	13%	13%	–
Heterosexual / straight	73%	73%	–
Prefer not to say / not declared	14%	14%	–

Characteristic	31 March 2026	31 March 2025	Change
Caring responsibilities			
No	54%	50%	+4%
Yes	39%	41%	–2%
Prefer not to say / not declared	7%	9%	–2%
Age			
16–24	*	*	–
25–34	28%	31%	–3%
35–44	25%	26%	–1%
45–54	26%	23%	+3%
55+	20%	20%	–
Gender reassignment			
No	88%	89%	–1%
Yes	4%	*	–
Prefer not to say / not declared	9%	*	–

We remain committed to fair and inclusive recruitment and progression, and to attracting and retaining talented people from the widest possible range of backgrounds.

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

Due to rounding, total percentages may not equal 100%.

Communications and correspondence

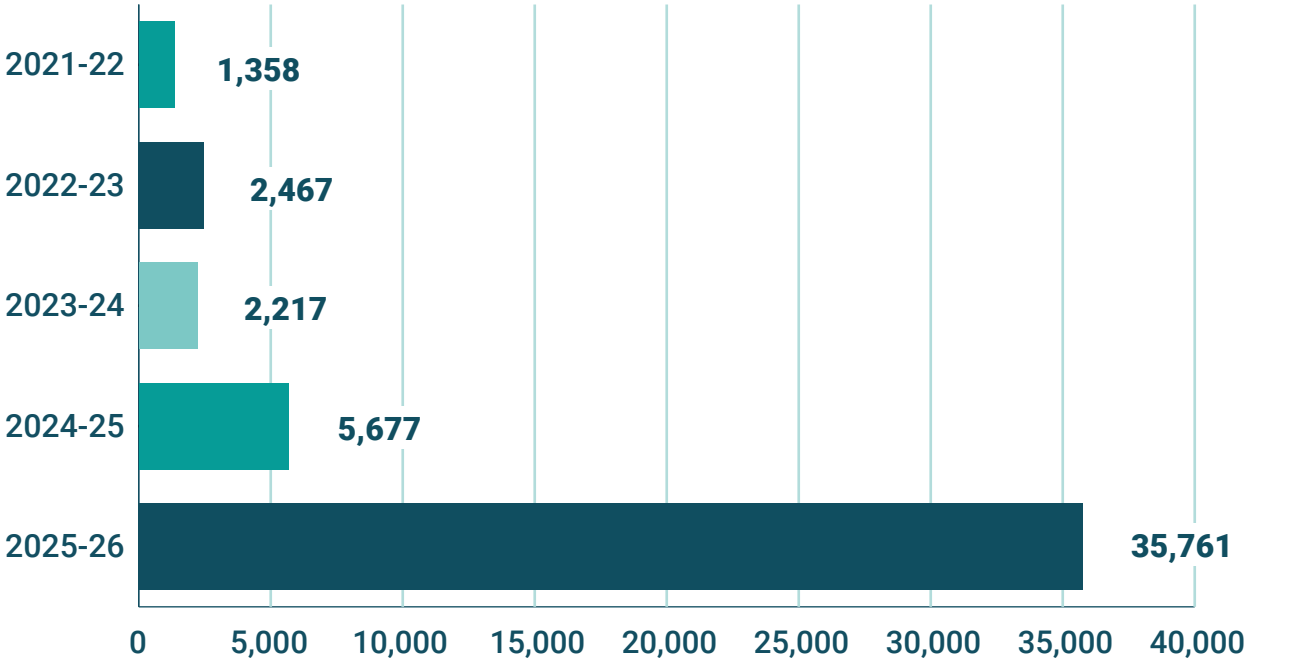
Our correspondence team forms an integral part of the public face of the EHRC. We receive and respond to emails, letters and phone calls from individuals, organisations, MPs, parliamentarians and stakeholders requesting information, advice, legal support and regulatory action on a wide range of issues.

Correspondence levels increased by 55% in 2025–26. This was due to a significant number of enquiries following the Supreme Court judgment in For Women Scotland Ltd v The Scottish Ministers in April 2025 and our consultation to update the code of practice for services, public functions and associations in May 2025. We received 7,188 enquiries in 2025–26 and we responded to 93% within the target response time of 20 working days. This compares to 4,640 enquiries received in 2024–25 (95% responded to within 20 working days).

Media mentions

In 2025–26, the EHRC was mentioned in 35,761 pieces of media coverage, which is an increase of 530% on the previous year (5,677). The Supreme Court judgment on the definition of 'sex' in the Equality Act on 16 April 2025 led to a significant increase in media mentions. In April 2025 alone, the EHRC was mentioned in 10,031 items.

Total media mentions*

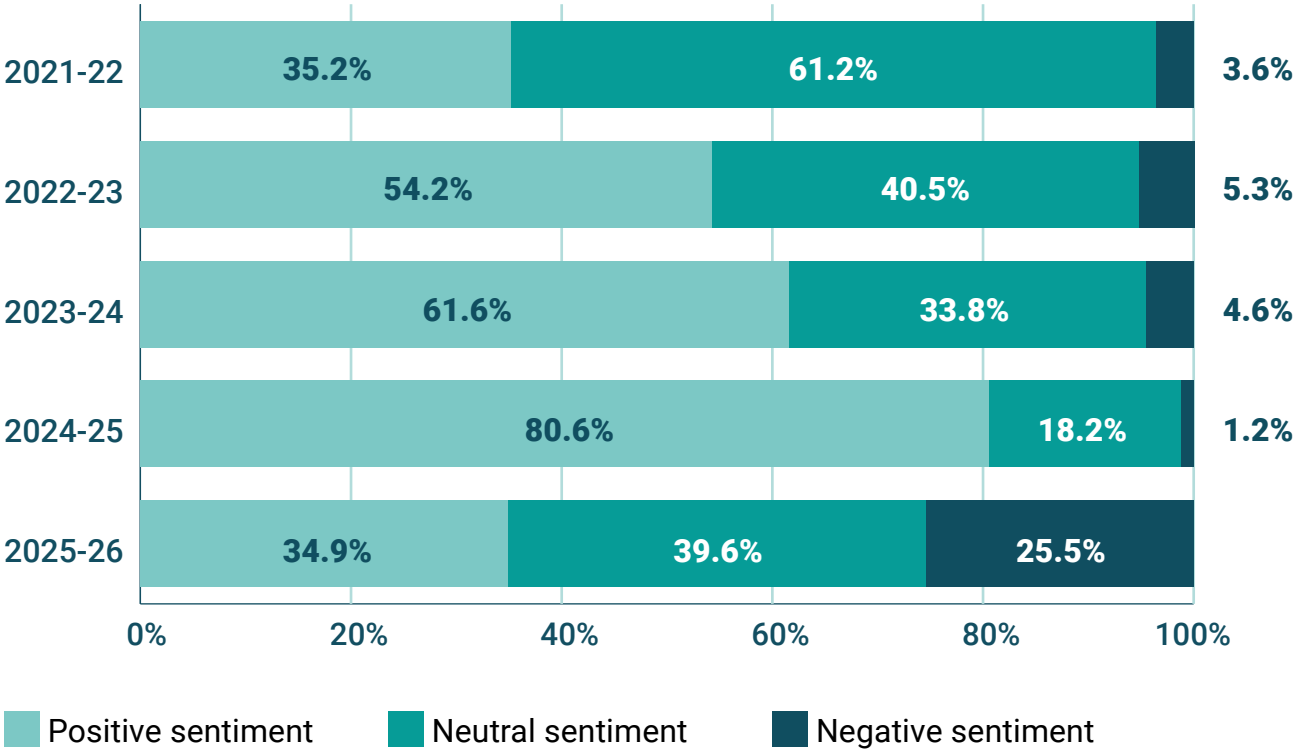


** 'Total media mentions' includes both unique items of coverage and all syndicated coverage. In previous annual reports, media mention data included only unique items.*

Media sentiment

The sentiment of our media coverage was more evenly spread this year: 34.9% was positive, 39.6% was neutral and 25.5% was negative. This compares to 80.6% positive, 18.2% neutral and 1.2% negative sentiment in 2024–25.

Media sentiment



Stakeholder engagement

We work with a wide range of stakeholders to deliver our strategic plan, improve our work, and promote compliance with equality and human rights law. Our partners include parliamentarians across the UK, Scotland and Wales, civil society organisations, government departments, public bodies, business and legal organisations.

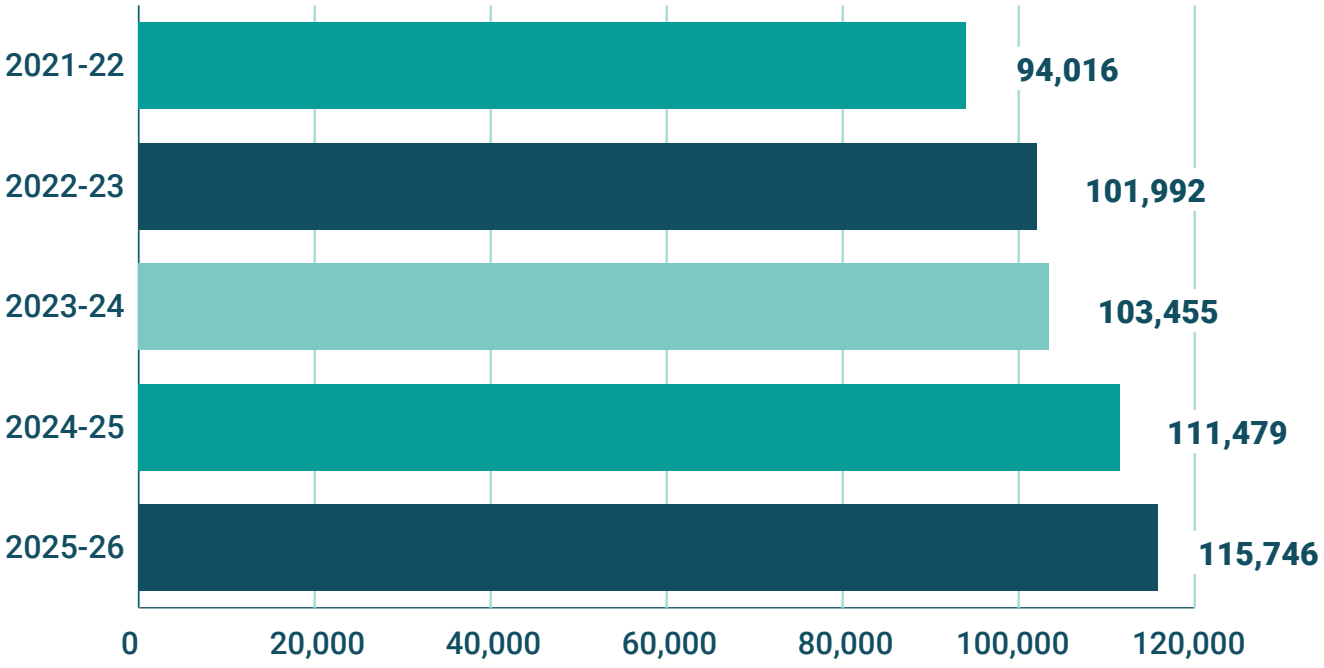
We engaged stakeholders on proposed updates to the code of practice for services, public functions and associations. This included parliamentarians and organisations representing people with the protected characteristics of sex, sexual orientation and gender reassignment, as well as wider human rights groups. We have strengthened relationships to support programmes on improving access to public transport and addressing race- and sex-based discrimination, harassment and victimisation in the uniformed services (armed forces, police, and fire and rescue services).

Since her appointment on 1 December 2025, our Chair, Dr Mary-Ann Stephenson, has made stakeholder engagement a priority, meeting a broad range of organisations across all three nations. In March 2026, we co-hosted an event with Equally Ours to explore collaborative approaches to protecting and promoting human rights.

Social media

At the end of 2025–26, we had 115,746 social media followers across our channels (X, YouTube, Facebook, Instagram, BlueSky and LinkedIn). This was a 3.8% increase on 2024–25, when we had 111,479 followers. In July 2025, we launched on a new channel, BlueSky, and the follower count had grown to 506 as of end March 2026.

Social media followers



Performance report

Sustainability reporting

We report sustainability information in line with the Government Financial Reporting Manual (FReM) and HM Treasury sustainability reporting guidance, as applicable to the Equality and Human Rights Commission (EHRC).

EHRC is a non-departmental public body and is below the current HM Treasury thresholds for mandatory TCFD-aligned climate-related financial disclosures. We have also not been directed by our sponsoring department to adopt TCFD reporting for 2025–26. Accordingly, TCFD disclosures are not included in this report.

Notwithstanding this, we continue to develop our approach to sustainability and environmental reporting. We provide disclosures consistent with the Greening Government Commitments and minimum reporting requirements, including greenhouse gas emissions, energy consumption, business travel, waste, water use and procurement. Our data from 2022–23 is used as our baseline for comparison and reporting.

We will keep emerging reporting requirements under review and will enhance our disclosures where proportionate and appropriate.

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 2025–26, 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 made further improvements to our internal capability, capacity and understanding of sustainability and carbon literacy.

We have finalised a new Environmental, Social and Governance (ESG) statement setting out specific, measurable targets to strengthen our approach to sustainability, ethical practices and societal impact. The statement covers key areas including operations (estates, travel and service delivery), Finance and Procurement, People (inclusion, health and wellbeing) and community (colleague engagement and volunteering). We have included a high-level action plan with delivery commitments for each year of the strategic plan, which we will report on periodically.

Our locations and premises

We are a minor tenant in all the buildings that we occupy. We are not the decision maker regarding most areas covered by GGC. Performance reported is in line with the minimum reporting requirements for GGC.

We occupied space at Arndale House, Manchester and West George Street, Glasgow for the full reporting period. At both locations, our electricity consumption is separately metered. 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 occupied space at Companies House, Cardiff, for the full reporting period. At this location, 80% or more of the property was occupied by Companies House who will report for the whole building. We therefore do not report data for this location.

We did not renew the licence for our office space at Tintagel House, London in January 2026. Sustainability data for this office is reported at building level. With only 16 desks, it was not possible or practical to disaggregate pro-rata costs for the small workspace we used.

We have therefore only included data from our Manchester office, Arndale House, and West George Street in Glasgow, where this data is available.

The following reporting areas, as set out in the minimum reporting requirements, are not applicable to EHRC:

- 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

Greenhouse gas (GHG) emissions		2025–26	2024–25	2023–24	2022–23
Tonnes of carbon dioxide equivalent (tCO_2e)	Scope 1 (direct) emissions	4.73	6.72	12.51	10.99
	Scope 2 (energy indirect) emissions	14.21	13.17	13.62	16.82
	Scope 3 (official business travel – domestic) emissions	22.18	22.46	21.95	5.27
	Total greenhouse gas emissions	**41.12**	**42.35**	**48.08**	**33.08**
Kilowatt hours (kWh)	Energy electricity green tariff (scope 2 and 3)	22,371*	831*	–	–
	Mains standard grid electricity consumption (scope 2 and 3)	43,986	59,047	87,212	87,000
	Natural gas	21,479**	30,562**	67,835	60,220
	District heating systems	–	–	–	–
	Heat from other sources	–	–	–	–
	Total related energy use	**87,836**	**90,440**	**155,047**	**147,220**
£	Expenditure on energy	19,177	17,319	9,747	9,090***
	Expenditure on business travel	201,655	251,371	193,220	148,298
	Total related expenditure	**220,832**	**268,690**	**202,967**	**157,388**

** Glasgow Office only, in scope from 04 March 2025*
*** Data relates only to Arndale House, Manchester*
**** Does not include West George Street, Glasgow as CO_2 data not available and cannot be calculated by us.*

Expenditure on business travel has reduced, partially due to a reduced workforce and encouraging our teams to make greener choices where possible. Our travel provider includes sustainability information when booking.

In 2025–26, we travelled 14,599 miles (23,430 kilometres) by domestic flights, releasing 5.37 tonnes CO_2e (with RF) emissions. The main reasons for domestic flights are face-to-face meetings in our offices for staff and Board members.

In 2025–26, the distance travelled by international flights reduced to 7,986 miles (12,852 kilometres) and released 1.62 tonnes CO_2e (with RF) emissions compared to 2024–25 data of 21,082 miles (33,928 kilometres) and 5.92 tonnes CO_2e (with RF) emissions. International flights mostly relate to staff travelling to participate in conferences in Europe, for example at the United Nations (UN) in Geneva.

We continue to encourage all staff to 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

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

Reporting item	Totals in Tonnes			
	2025–26	2024–25	2023–24	2022–23
Total waste reused or recycled externally (excluding ICT waste)	–	–	0.624	0.369
Total ICT waste: recycled (externally)	0.145	0.898	–	–
Total ICT waste: reused (externally)	0.226	–	–	–
Total waste incinerated with energy recovery	–	–	–	–
Total waste incinerated without energy recovery	–	–	–	–
Total waste composted or sent to anaerobic digestion	–	–	–	–
Total waste recycled	**0.371**	**0.898**	**0.624**	**0.369**
Total waste to landfill*	**–**	**–**	**0.828**	**0.335**
Total waste	**0.371**	**0.898**	**1.452**	**0.704**
£000's Total waste disposal cost**	**Not available**	**Not available**	**Not available**	**Not available**

** We are unable to report waste statistics for our Manchester Arndale office because the available waste and recycling information relates to the entire shopping centre and office building. Our space apportionment of 3% is not considered a sufficiently reliable basis to use to calculate our proportion.*

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

The waste to landfill data for 2023–24 and 2022–23 relates to Windsor House, London which we vacated in September 2024.

Paper consumption

We came into scope for this target in 2022, and 2022–23 is used as the baseline year.

In 2025–26, we purchased 54 reams of A4 paper in total across all sites, compared with 41 reams in 2024–25. We only purchase 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.

	2025–26	2024–25	2023–24	2022–23
Reams of paper procured (A4 equivalent)	54	41	117	5
Cost of paper (£)	463.60	180.00	365.81	17.97
Printed output	36,504 (sheets) (464kg CO_2)	36,996 (sheets) (470kg CO_2)	38,810 (sheets) (493kg CO_2)	74,027 (sheets) (562kg CO_2)
Savings from print jobs not released	557 (sheets) (7kg CO_2)	2,274 (sheets) (30kg CO_2)	9,123 (sheets) (116kg CO_2)	11,359 (sheets) (80kg CO_2)

Reducing our water waste

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, the figure is calculated based on our footprint within the building (5.03%). Based on the figures provided, our water consumption has increased by 175m^3 or 50% compared to 2024–25.

		2025–26	2024–25	2023–24	2022–23
Water consumption	Cubic metres (m^3)	526	351	366	518
Total water cost	**£000**	**Not available**	**Not available**	**Not available**	**Not available**

Procuring sustainable products and services

We are 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 the whole life environmental and landfill impacts. During 2025–26, we expanded our use of cloud services and further reduced our reliance on legacy physical infrastructure. This has allowed us to replace older ancillary equipment, including air-conditioning and power protection, with new equipment that is appropriately sized to support the power and cooling requirements. Where we have a requirement for new physical IT infrastructure, we have ensured that new equipment is sized according to our needs.

Performance report

Going concern statement

The financial statements within this report 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 2026–27 budget has been confirmed, and grant-in-aid funding is included in the Cabinet Office main estimates for the year. We have been issued our budget delegation for 2026–27, which confirms an RDEL total of £17.672m and a CDEL total of £0.5m.

John Kirkpatrick
Chief Executive and Accounting Officer

2 July 2026

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 framework, internal control arrangements and management structures support the delivery of our objectives as detailed in our 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 sets the corporate strategy and oversees corporate performance. The Board receives advice and assurance from the statutory Scotland and Wales Committees. It is also advised by its Audit and Risk Assurance Committee (ARAC), its People and Workspace Committee (P&WC) and its Public Reporting Committee (PRC). Further details of these and their remit are provided on **pages 79 to 87**.

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

Board of Commissioners

The Board of Commissioners (the Board) holds a remit which includes setting the strategic direction, monitoring and reviewing overall performance and delivery of the organisation, and ensuring good governance.

Management of operations is delegated to the Chief Executive who is 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 resources are managed effectively and efficiently.

The Chair 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.

Board members are appointed by the UK government's Minister for Women and Equalities. 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 **pages 110 to 112**.

On 31 March 2026, the Board comprised seven non-executive members; the Chief Executive is a Commissioner ex-officio. During 2025–26, four Commissioners' terms ended, including that of the Chairwoman and the Deputy Chair. In the same period, a new Chair, one Commissioner and two Interim Commissioners were appointed. The Board has continued to meet and carry out its functions effectively despite the reduction in Commissioners.

Martyn Jones, the Chair of the Wales Committee, attended Board meetings due to the Wales Commissioner post remaining vacant throughout the year.

Alasdair Henderson, Commissioner, currently chairs the Scotland Committee due to the term of the previous Scotland Commissioner ending on 30 November 2025.

The post of Deputy Chair has remained vacant since the term of the previous Deputy Chair ended on 30 November 2025.

Recruitment for Commissioners is underway and three appointments have been confirmed effective from May 2026. Recruitment for the Scotland and Wales Commissioners will continue into 2026–27.

Board meetings cover all aspects of our work on regulation, policy, strategy and corporate services as well as emerging equality and human rights issues. During 2025–26, there were seven routine and four additional Board meetings, attendance for each member is shown on **page 78**.

Board priorities for 2025–26 included:

- the code of practice for services, public functions and associations, following the decision of the Supreme Court in For Women Scotland Ltd v The Scottish Ministers in April 2025
- reviewing draft technical guidance for schools in England, Scotland and Wales
- engaging with government proposals and consultations
- reviewing the scheme of delegation for internal policies and developing internal policies
- transitioning to a new Chair and Commissioner membership and adapting Committee arrangements
- other organisational delivery and outcomes from the business plan, including governing the internal change programme

The chair of each committee provides an update to the Board at every meeting, providing further assurance and strategic advice.

The Board also received business updates and performance reports from the Chief Executive. These outline progress against the business plan and highlight any emerging issues. The Board recommends actions based on the content of the reports and is content with the quality of the information provided and the frequency.

Board meeting attendance	
Name	**Attendance / eligibility**
Dr Mary-Ann Stephenson (Chair)	2/2
Baroness Kishwer Falkner (Chairwoman) (until 30 November 2025 when term ended)	9/9
Dr Lesley Sawers (Deputy Chair and Scotland Commissioner) (until 30 November 2025 when term ended)	8/9
Baroness Joanne Cash (resigned 30 November 2025)	8/9
Alasdair Henderson*	9/11
Kunle Olulode	11/11
Akua Reindorf (until 31 December 2025 when term ended)	8/9
Keith Richards	6/11
Martyn Jones**	10/11
Ali Harris (appointed 1 January 2026)	2/2
Professor Shazia Choudhry (appointed 1 January 2026)	1/2
John Kirkpatrick (Chief Executive)	11/11

** Alasdair Henderson, as interim chair of the Scotland Committee from 1 December 2025, represented the Committee at Board meetings.*

*** Martyn Jones, as interim chair of the Wales Committee, represented the Committee at Board meetings during 2025–26 in the absence of a Wales Commissioner. He was appointed Commissioner from 24 March 2026 and continues to chair the Wales Committee.*

Committees of the Board

The board receives assurance 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 2025–26 and one special meeting. The Committee also held one informal development day. The Committee was chaired by the Deputy Chair and Scotland Commissioner, Dr Lesley Sawers, until her term of office ended 30 November 2025. The Committee has since been chaired by Alasdair Henderson, Commissioner. In 2025–26, the Scotland Committee gave advice to the Board on matters that impact in Scotland including:

- the draft code of practice for services, public functions and associations
- the draft technical guidance for schools in Scotland
- the 2026–27 business plan
- government policies and consultations, including Scottish hate crime legislation, implementing the socio-economic duty in England, the proposed reforms to the Public Sector Equality Duty (PSED) and Scotland specific duties
- the stakeholder engagement strategy

The Committee progressed the EHRC's Strategic Framework Agreement with the Scottish Human Rights Commission.

The Committee reviewed the Scottish Government and Parliament's priorities as they align with the EHRC's priorities and pre-election engagement plans. They issued a briefing on current equality issues and priorities to political candidates and parties ahead of the Scottish Parliament elections to be held in May 2026.

An internal review of the Committee's effectiveness was carried out in October 2025, and recommendations are being taken forward through an action plan into 2026–27.

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

The Scotland Commissioner and Interim Chair of the Scotland Committee held meetings with stakeholders throughout the year. These included members of the Scottish Parliament on topics including the consultation on the code of practice, updates on government plans for PSED, progress on PSED reform and EHRC updates. They also met with the Scottish Human Rights Commission and other stakeholders to discuss the EHRC's priorities.

Scotland Committee meeting attendance	
Name	**Attendance / eligibility**
Alasdair Henderson (Chair) (from 1 December 2025)	1/1
Dr Lesley Sawers (Chair) (until 30 November 2025 when term ended)	4/4
Mariam Ahmed	5/5
Mandy Rhodes	3/5
David Stirling	4/5
Arlene Stokes	5/5
Dr Lesley Thomson	4/5
Professor Adam Tomkins	3/5

More information about the Scotland Committee and its work is on **our website**.

Wales Committee

The Wales Committee uses its statutory powers in the Equality Act 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 2025–26 and held two special meetings. The Committee also held one informal development session over two days. The post of Wales Commissioner remained vacant during 2025–26. Martyn Jones, Wales Committee Member, has chaired the Wales Committee and represented the Wales Committee at Board meetings. Martyn Jones was appointed Commissioner in March 2026 and continues to chair the Wales Committee.

In 2025–26, the Wales Committee gave advice to the Board on matters that impact equality and human rights in Wales, including:

- the draft code of practice for services, public functions and associations
- the draft technical guidance for schools in Wales
- the 2026–27 business plan
- progress of work towards our reaccreditation as a National Human Rights Institution by the Sub-Committee on Accreditations

The Committee reviewed the Wales Impact report which resulted in the Cabinet Secretary for Social Justice issuing a written statement 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 2025–26. They issued guidance on freedom of expression and respectful discourse to political parties and met with their policy leads ahead of the Senedd elections in May 2026. They reviewed our internal policies on providing Welsh language translation of our content.

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 Cabinet Secretaries to discuss a range of equality and human rights matters. He also chaired an Equality and Human Rights Exchange Network discussing our work with local authorities on the PSED, equality impact assessments and senior scrutiny of the PSED.

Wales Committee meeting attendance	
Name	**Attendance/ eligibility**
Martyn Jones (Interim Chair)	6/6
Chris Dunn	6/6
Helen Mary Jones	6/6
Lauren McEvatt	5/6
Bethan Thomas (resigned June 2025)	2/2
Mary van den Heuvel	6/6
John Williams	6/6

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' (August 2025) 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 four formal meetings during 2025–26 and two informal review meetings, one to review the 2024–25 Annual Report and Accounts draft and one to review the internal audit plan for 2026–27.

In 2025–26, the ARAC considered financial performance, risk management, 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. Recommendations from the ARAC effectiveness review, which reported in July 2025, are being carried out. The Terms of Reference for the Committee have been updated in line with the guidance and good practice principles set out in HM Treasury's 'Audit and Risk Assurance Committee Handbook' (August 2025).

ARAC meeting attendance	
Name	**Attendance / eligibility**
Commissioners	
Kunle Olulode (Chair)	6/6
Baroness Joanne Cash (resigned 30 November 2025)	3/4
Dr Lesley Sawers (until 30 November 2025 when term as Commissioner ended)	1/4
Ali Harris (from 22 January 2026)	1/1
Independent Members	
Reyaaz Jacobs	6/6
Dónall Curtin (from 1 October 2025)	3/4
Charlotte Moar (until 30 September 2025 when term ended)	3/3

More information about the ARAC is 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 three formal meetings during 2025–26. There were no informal or special meetings. It was chaired by Baroness Joanne Cash, Commissioner until her resignation on 30 November 2025. The Committee has since been chaired by Keith Richards, Commissioner.

In 2025–26, the P&WC provided advice and assurance to the Board on matters including workplace policies and staff code of conduct. They considered the impact on the EHRC of the phased commencement of the Employment Rights Act 2025. They also considered people issues, including the 2025 people survey and the 2025–26 pay and reward. The committee received reports about the estates strategy including a review of our operating locations and health and safety. The committee received updates on the EHRC's change programme and provided assurance to the Board.

The committee also provided oversight for strategic and operational delivery, such as our gender pay gap reporting, workforce diversity reporting, other people metrics, learning and development, industrial relations and risks including those relating to people, infrastructure, and estates.

P&WC meeting attendance	
Name	**Attendance / eligibility**
Commissioners	
Keith Richards (Chair) (from 1 December 2025)	1/1
Baroness Joanne Cash (Chair) (resigned 30 November 2025)	2/2
Akua Reindorf (until 31 December 2025 when term ended)	2/2
Kunle Olulode (from 19 November 2025)	1/1
Independent Member	
Jonathan Parsons	3/3

More information about the P&WC is on **our website**.

Public Reporting Committee

The Public Reporting Committee (PRC) provides assurance 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 four formal meetings during 2025–26. There were no informal or special meetings. The PRC reviewed papers by correspondence on seven occasions. It was chaired by Alasdair Henderson, Commissioner.

In 2025–26 the PRC considered the following matters:

- existing equality law and possible areas of reform
- extending mandatory ethnicity and disability pay gap reporting
- our guidance on the use of equality data in the uniformed services
- the Independent Review of Public Order and Hate Crime legislation
- the legal framework for law enforcement use of facial recognition and other biometric technologies
- our research report on the socio-economic duty in Scotland, Wales and England
- our independent assessment report of the UK's progress in implementing recommendations from its fourth Universal Periodic Review

An informal review of the functioning of the PRC took place in July 2025. Recommendations made and implemented during the year, included revising the committee's terms of reference in relation to quoracy requirements and its delegated approvals.

PRC meeting attendance	
Name	**Attendance / eligibility**
Commissioners	
Alasdair Henderson (Chair)	4/4
Baroness Joanne Cash (resigned 30 November 2025)	0/2
Baroness Kishwer Falkner (until 30 November 2025 when term ended)	1/2
Akua Reindorf (until 31 December 2025 when term ended)	2/3
Keith Richards	3/4
Dr Mary-Ann Stephenson (from 1 December 2025)	2/2
Appointees	
David Goodhart (until 30 November 2025 when term ended)	1/2
Su-Mei Thompson	3/4

The PRC terms of reference provide for the Scotland or Wales Commissioner to request to attend any PRC meeting that they consider relevant to their role, with the approval of the EHRC Chair. The Wales Committee Interim Chair attended one meeting in 2025–26.

Remuneration Committee

The Remuneration Committee (RC), chaired by Baroness Joanne Cash, Commissioner, operated as a subcommittee of the P&WC and held a remit to:

- ensure that public money is used efficiently and effectively in relation to senior executive pay and conditions and is aligned to the EHRC Framework Document, and HM Treasury guidance

- ensure that 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 merged with the P&WC in October 2025 to support efficient and effective governance arrangements given the reduced capacity of Commissioners 2025–26.

Prior to being merged, the RC held one formal meeting in 2025–26. At this meeting, RC considered the 2025–26 staff pay remit, and the strategic outline case for the change programme.

Remuneration Committee meeting attendance	
Name	**Attendance / eligibility**
Commissioners	
Baroness Joanne Cash (Chair)	1/1
Kunle Olulode	1/1
Baroness Kishwer Falkner	1/1
Dr Lesley Sawers	1/1

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 Statement of 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 guidance published by HM Treasury, 'Managing Public Money'.

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 have been in post as Chief Executive and Accounting Officer for the entire reporting period. 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 2025–26.

Scope of Responsibility

As Accounting Officer, 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. Framework documents are a core constitutional document of arm's length bodies and govern the collaborative relationship and contain details of my responsibilities as the Accounting Officer of EHRC. The framework document is in the process of being updated and will be finalised during 2026–27.

The Framework Document is on **our website**.

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 2025–26 are on **page 78**.

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 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.

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. As at 31 March 2026, we only have seven appointed Commissioners and are awaiting the appointment of further Board members during 2026–27.

Members of the Board maintain 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

Board effectiveness reviews are required by our Governance Manual to take place informally every 18 to 24 months, with an in-depth external review every three years. The previous external Board effectiveness review was carried out in 2022.

Due to changes to Board membership, the Board agreed to defer the next external review until 2026–27 following an onboarding period for the new Chair and Commissioners. As new Commissioners have been appointed, we have refined and refocused our induction process. We have continued to improve the Board's effectiveness through refining our Board and Committee meeting schedule and reviewing the scheme of delegation and assurance for internal policies.

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 to review the organisation's delivery performance and progress against other 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

Information management

Information governance and the protection of assets containing personal and sensitive data are a priority for us. The Deputy Chief Executive acts as the Senior Information Risk Owner (SIRO) and works closely with the Data Protection Officer (DPO). Each team has appointed Data Owners and Data Champions who are responsible for records management of their team data.

The SIRO chairs an Information Governance Steering Group that is responsible for information risk management across the organisation. A monthly report is presented to Leadership Team and an annual Information Governance Assurance Report is provided to the Audit and Risk Assurance Committee.

During 2025–26, we:

- processed an unprecedented volume of complex information requests, with minimal impact on deadline compliance
- ensured data protection by design and default in key projects
- continued to consider using artificial intelligence in-house, upskilling key staff on governance controls and assessing proposals
- facilitated staff information governance training, and delivered bespoke training for commissioners and committee members

Personal data incidents

Between 1 April 2025 and 31 March 2026, nine data breaches were reported (seven in 2024–25). Eight were ‘low’ or ‘no’ impact, one was high impact, involving a leak of data regarding the code of practice consultation.

Four incidents required reporting to the Information Commissioner’s Office (ICO). The ICO reviewed the incident reports and concluded that no further action was required. All incidents were investigated, and lessons learned.

Freedom of information requests

During 2025–26, we received 445 requests under the Freedom of Information (FOI) Act 2000. Of these, 99% received a response within the statutory deadline of 20 working days, compared to 130 (100%) in 2024–25. The increase in requests related to areas concerning the Supreme Court judgment in the For Women Scotland Ltd v The Scottish Ministers case, which established how the words 'woman', 'man' and 'sex' should be interpreted in the Equality Act 2010, and our response to this.

72 requests were subjected to internal review* compared to 12 in 2024–25. Eighteen refused requests were appealed to ICO, compared to four in the previous year, and we have received the ICO's conclusion on five of those requests. Four request responses were not upheld because the ICO agreed with our response, and one was partially upheld as ICO concluded that additional information should be disclosed. This request has been appealed to the First Tier Tribunal.

** An internal review involves an assessment of the initial response. This is undertaken by a person independent of the original response, who reviews the handling of the request and the application of any exemptions. If the requester remains dissatisfied following the outcome of the internal review, they may complain to the Information Commissioner's Office.*

Internal complaints and grievances

It is important that everyone working with the EHRC, including employees, contractors, Commissioners and Committee members, is able to raise concerns about the standards of service we provide or about the behaviour of those delivering that service.

Employees can raise concerns through our Dispute Resolution Policy and Procedure, our Anti-Bullying and Harassment Policy and Procedure, or our Sexual Harassment Policy. Concerns relating to Commissioners and Committee members are considered under the Concerns and Complaints Policy: non-compliance with the Code of Conduct.

During 2025–26, we received two formal internal employee complaints. One was resolved during the year and, at 31 March 2026, one remained ongoing and was progressing through the appeal stage. We also received one employment tribunal claim during the year.

External complaints

In 2025–26, we received 18 complaints from outside the organisation, compared to 20 in 2024–25. This table 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	2
Upheld	2*
Partly Upheld	3
Not Upheld	8
Rejected / Withdrawn	3

** 1 referred to PHSO*

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 2025 to 31 March 2026. We have not received any correspondence from the PHSO at this date.

More information about our complaints policy is on **our website**.

Internal whistleblowing

Our whistleblowing policy is available to all staff on the intranet and sets out how concerns about behaviours and practices at the EHRC can be raised. The policy is supported by detailed guidance on the procedures to be followed when raising a concern.

During 2025–26, we continued to strengthen awareness of our whistleblowing arrangements. Building on the training delivered in 2024–25 to staff and officers involved in internal whistleblowing processes, our nominated officers delivered a peer learning session for staff. We have appointed Kunle Olulode, Commissioner as our whistleblowing champion to provide additional oversight and support for our whistleblowing arrangements. All new starters are required, as part of their induction, to familiarise themselves with the whistleblowing section of the intranet.

There have been no whistleblowing reports in 2025–26.

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**.

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 by the Board and the Leadership Team to ensure that it complies with all current requirements and is tested as part of the internal audit work programme.

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 budgets to directors on the basis of a costed business plan for their areas of responsibility.

The scheme of delegation underpins the financial delegations contained in the Framework Document and is designed to enable budget holders to make decisions. Budget holders are accountable for the effective management of their delegated budget, the decisions they make and for 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.

Fraud

A counter-fraud policy is in operation which aligns with government requirements. Staff are expected to act with integrity to safeguard the public resources for which they are responsible and are required to complete mandatory training on the subjects of fraud, bribery and corruption.

There were no cases of fraud identified in 2025–26.

Conflicts of interest

The governance framework sets out the rules and guidance for Commissioners and Committee members on conflicts of interest 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.

The code explains the actions that staff need to take to recuse 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, including stating if they have no conflicts to declare.

In compliance with business appointment rules, the EHRC is transparent in the advice given to individual applications for senior staff. No staff currently hold external business appointments.

Auditing of accounts

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

Risk management

We recognise informed risk-taking creates opportunity to maximise the benefits gained from our activity and effective risk management supports us to use our available resource effectively.

Risk management practices comply with the requirements of the HM Treasury risk management guidance Orange Book's Main Principles. Our principal risks are also aligned to the risk categories in the Orange Book. Risk management is embedded at every level. The EHRC manages risk at strategic, corporate and operational levels across the organisation.

The Board is responsible for the overall risk framework, the strategic risk appetite for the organisation and the risk management policy. The Board also has oversight of the corporate risk register. The ARAC provides a challenge function to risk management arrangements, including deep dive reviews, internal audit reviews and the assurance of processes. The Board receive advice about risk from the Leadership team, ARAC and P&WC.

The corporate risk register, strategic risks and risk appetite are reviewed by the Board on an annual basis. The risk framework recognises all staff have a role to play in managing risk at EHRC, however for risk management to be successful it should involve oversight and ownership at suitable levels.

2025–26 Risk framework

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 2025–28 strategic plan.

The seven strategic risks and appetite in 2025–26 were as follows.

External environment

Our approach must be legal and evidence-based. We are prepared to take some risks in areas where evidence is lacking if we need to take a position on issues of strategic importance.

Stakeholder relationships

We want to have a reputation as an independent, authoritative and effective regulator. Our decisions must be transparent and defensible. We have low tolerance for risk relating to our reputation as a regulator. However, we accept the risk that sometimes our decisions will not be welcomed by some stakeholders who may themselves be partisan or subject to our regulatory actions.

Mission and strategy

We have low tolerance for strategic confusion and must have a clear strategy that deploys our limited resources effectively across our broad remit. However, we accept the risk that we cannot cover all areas of potential inequality in all sectors, and that we may at times experience legal challenge, including to clarify the law.

Delivery

We have low tolerance for delivery failure or not using our resources effectively. However, we recognise that in-year events may shift our priorities and require us to be flexible and responsive in order to be more effective in delivering against our strategic goals.

People

The quality of our output is wholly dependent on the expertise of our staff. We have low tolerance for carrying the risk of too few, unprofessional or disaffected staff.

Change and improvement

We aspire to manage change and improvement well. However, we accept that some risk is necessary when engaged in transformational change and trying new approaches or ways of working.

Governance and compliance

We are a public body and a regulator. We have no appetite for not complying with standards and law, or for poor internal governance.

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 104 to 105**.

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, it identifies and manages risk, rather than eliminating all risk of failure. It provides reasonable but not absolute assurance of effectiveness; the system supports 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 2025–26 and up to the date of approval of the Annual Report and Accounts and accord with HM 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 provided with a delegation letter which sets out their budget and responsibilities in managing that budget at the beginning of the year and 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 during the year 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. The ARAC Chair reported to the Board at each meeting and provided assurance about matters including risk management, governance and internal controls.

The ARAC has produced an annual report of its work for my and the Board's consideration summarising its programme of work for 2025–26. The ARAC has not identified any additional issues requiring disclosure beyond those already noted in this report.

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.

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 particularly provided effective challenge about improvements to the risk framework to ensure that it reflected the work of the Commission to improve its internal compliance processes. There was also particular challenge about ownership and accountability for internal policies on the register.

ARAC engaged with EHRC's internal and external auditors throughout the year. We have discussed all reports from our internal auditor within the planned timeframes. We reviewed the internal audit plan for the coming financial year.

During this financial year we have seen a change in the Committee membership, and I extend my thanks to those independent members and Commissioners who have left during the year and welcome our new independent member and Commissioner. Members of the Committee have provided stability and continued to deliver their role highly effectively during this time.

ARAC is of the opinion that control systems are in place and these have performed adequately.

Assurance provided by the annual internal audit opinion

Internal Audit

TIAA acted as our internal auditor during 2025–26. 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 Global Internal Audit Standards.

The internal auditors provide an annual report which summarises 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.

The audit plan for 2025–26 included 100 days of audit time. A total of eight audits including six assurance reviews, one compliance review and one ICT assurance review were planned to ensure the internal control system is adequate and to ensure that activities and procedures are operating to achieve the EHRC's objectives. One assurance audit was cancelled, this was due to internal capacity and limited progress on work to be audited, all of the audit days were used towards other internal audits.

Each of the seven audits completed was given an assurance rating:

- four were rated as 'substantial' assurance, meaning that 'there is a robust system of internal controls operating effectively to ensure that risks are managed, and process objectives achieved'

- three were rated as 'reasonable', 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'

- no audits returned a limited level of assurance.

The following areas were reviewed and reported on as part of the 2025–26 plan.

System	Assurance assessment
Information governance	Substantial
Special payments	Substantial
ICT service management	Reasonable
Lease and property expenditure	Substantial
Policy development	Substantial
Communications and media	Reasonable
Transformation Programme	Reasonable
Three nations to one nation approach	Cancelled

The internal auditor reports on findings and makes recommendations to management, who develop and agree an action plan to address any weaknesses identified.

Recommendations received as part of the internal audit have been reviewed by management and actions agreed. Progress against these actions is monitored through a report to the ARAC at every meeting.

This year, based on their audit work, the TIAA internal audit director 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.

Accounting Officer's conclusion

As Accounting Officer, I have considered the evidence provided during the production and review of the Annual Governance Statements 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 2026.

Considering the assurances that I have received along with other evidence made available to me during the course of the year, 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

2 July 2026

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 and Committee 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 Former Chairwoman was remunerated at a rate of £500 per day and expected to work for up to 100 days per annum (total fees paid to the 30 November 2025 are based on 66.67 days).

To facilitate an effective onboarding period, approval was given for the current Chair to work for three days per week remunerated at a rate of £500 per day. This arrangement was in place from 1 December 2025 until 31 March 2026 (total days worked 53) and will be reviewed in August 2026.

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).

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 Workspace, 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 in advance by the Chair. During 2025–26, Commissioners worked additional days due to the delay in appointing additional Commissioners to the Board and to cover urgent matters. These are noted in the remuneration table on **pages 110 to 112**.

Fees are paid in 12 equal instalments across the year and appointments are not pensionable. Non-executive Board members do not receive any bonus payments nor benefits in kind.

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 on **pages 110 to 114** 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 participate in meetings. HMRC guidelines class any travel to Board meetings held at our London office as 'commuting'. 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.

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.

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

	2025–26	2024–25
	£000	£000
Board members' fees (tables b, c, and d)	155	142
Board members' employer's National Insurance contributions (NICs) (tables b, c, and d)	19	10
Statutory and advisory committee members' fees (table e, and f)	53	46
Statutory and advisory committee members' employer's NICs (table e, and f)	1	–
Total	**228**	**198**

This table is a summary of emoluments disbursed rounded to the nearest £000. Further detail is shown in the following tables.

b) Chair

	Fees £		Expenses and travel costs £	
	2025–26	2024–25	2025–26	2024–25
Baroness Kishwer Falkner Term ended 30 November 2025	33,333	50,000	1,042	1,346
Employer's NICs paid on fees and expenses	4,500	5,645	–	–
Dr Mary-Ann Stephenson Appointed 1 December 2025 for a four year term	26,500	–	6,748	–
Employer's NICs paid on fees and expenses	3,820	–	–	–
Total	**68,153**	**55,645**	**7,790**	**1,346**

c) Deputy Chair

	Fees £		Expenses and travel costs £	
	2025–26	2024–25	2025–26	2024–25
Dr Lesley Sawers Term ended 30 November 2025	21,450 Fees include an additional 13 days	23,400	3,232	5,502
Employer's NICs paid on fees and expenses	3,178	2,704	–	–
Total	**24,628**	**26,104**	**3,232**	**5,502**

The Deputy Chair post remained vacant from 1 December 2025.

d) Fees and expenses for each Commissioner

	Fees £		Expenses and travel costs £	
	2025–26	2024–25	2025–26	2024–25
Alasdair Henderson* Reappointed 27 April 2022 for an additional four-year term	17,200 Fees include an additional 13 days	10,667	943	369
Kunle Olulode** Appointed 3 January 2023 for an initial four-year term	14,800 Fees include an additional 7 days	12,000	1,262	493
Keith Richards*** Appointed 13 November 2024 for an initial four-year term	13,467 Fees include an additional 7 days	3,826	114	–
Ali Harris Appointed 1 January 2026 for an initial two-year term	2,500	–	273	–
Shazia Choudhry Appointed 1 January 2026 for an initial two-year term	2,500	–	1,049	–
Martyn Jones** Appointed 24 March 2026 for a four-year term	400	–	–	–

** Chair of the Public Reporting Committee and Interim Chair of the Scotland Committee from 1 December 2025.*
*** Chair of the Audit and Risk Assurance Committee.*
**** Appointed Chair of the People and Workspace Committee 1 December 2025.*
***** Wales Committee member until 23 March 2026; interim Chair of the Wales Committee*

	Fees £		Expenses and travel costs £	
	2025–26	2024–25	2025–26	2024–25
Baroness Joanne Cash Appointed 16 January 2023 for an initial four-year term, resigned 30 November 2025	10,800 Fees include an additional 7 days	12,000	809	485
Akua Reindorf Appointed 20 December 2021 for an initial four-year term. Term ended 31 December 2025	12,700 Fees include an additional 7 days	10,000	596	104
Jessica Butcher Term ended 30 November 2024	–	6,667	–	229
David Goodhart Term ended 30 November 2024	–	6,667	–	292
Su-Mei Thompson Term ended 30 November 2024	–	6,667	–	2,938
Subtotal	**74,367**	**68,494**	**5,046**	**4,910**
Employer's NICs paid on fees and expenses	7,511	1,475	–	–
Total	**81,878**	**69,969**	**5,046**	**4,910**

Expenses in the tables on pages 110 to 112 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 represent the EHRC at external events.

	Fees £		Expenses and travel costs £	
	2025–26	2024–25	2025–26	2024–25
Scotland Committee	18,000	15,597	–	–
Wales Committee	23,613	22,750	4,324	3,284
Total (Scotland and Wales)	41,613	38,347	4,324	3,284
Employer's NICs paid	847	57	–	–

During 2025–26, the Scotland Committee consisted of six members who were in post for the whole reporting period and were each paid fees of £3,000.

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 2025–26, the Wales Committee consisted of five members who were paid £3,000 each for the whole of the reporting period. One member resigned in June 2025 and received fees of £750. Martyn Jones, interim chair of the Committee was allocated additional days in the absence of a Wales Commissioner and received fees totalling £7,863 up to 23 March 2026 when Martyn was appointed as a Commissioner.

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 fees 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.

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 and travel costs £	
	2025–26	2024–25	2025–26	2024–25
Reyaaz Jacobs (ARAC) Appointed 1 October 2024	2,000	1,000	87	291
Dónall Curtin (ARAC) Appointed 1 October 2025	1,125*	–	758	–
Charlotte Moar (ARAC) Term ended 30 September 2025	1,000	2,000	461	969
Gill Eastwood (ARAC) Term ended 30 September 2024	–	1,000	–	–
Jonathan Parsons (P&WC) Appointment extended until 30 November 2026	2,000	2,000	–	–
Su-Mei Thompson (PRC) Appointed 1 December 2024	3,000	1,000	–	–
David Goodhart (PRC) Term ended 30 November 2025	2,000	1,000	–	–
Total	**11,125**	**8,000**	**1,306**	**1,260**
Employer's NIC paid	56	–	–	–

**Attended the June ARAC 2025 meeting as an observer and received ½ day's allowance (£125)*

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 HM Treasury pay remit guidance when making any annual pay increases.

The reward package of senior managers (the Chief Executive, Deputy Chief Executive and Directors) is reviewed by the People and Workspace Committee (P&WC) annually. The P&WC has a remit to review the reward packages of senior managers in future years.

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

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

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

Salary and pension entitlements of senior managers – this information has been 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 2026.

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 P&WC. Bonuses are awarded on an individual basis.

Accrued bonus payments for the 2024–25 performance year were paid to eligible employees in 2025–26. Bonuses for 2025–26 have been accrued and will be paid during the 2026–27 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 2025–26, nor in 2024–25.

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, Chief Executive					
2025–26	145–150	0–5	–	27	170–175
2024–25	140–145	–	–	119	255–260
Penny Hobman, Deputy Chief Executive joined 27 January 2025					
2025–26	115–120	–	–	25	140–145
2024–25	20–25 FYE 110–115	–	–	6*	30–35

** Previously reported as 11 due to last years' reported calculation being pre-remedy*

Accrued pension benefits included in this table for any individual affected by the Public Service Pensions Remedy have been calculated based on their inclusion in the legacy scheme for the period between 1 April 2015 and 31 March 2022, following **the McCloud judgment**. The Public Service Pensions Remedy applies to individuals that were members, or eligible to be members, of a public service pension scheme on 31 March 2012 and were members of a public service pension scheme between 1 April 2015 and 31 March 2022. The basis for the calculation reflects the legal position that impacted members have been rolled back into the relevant legacy scheme for the remedy period, and that this will apply unless the member actively exercises their entitlement on retirement to decide instead to receive benefits calculated under the terms of the Alpha scheme for the period from 1 April 2015 to 31 March 2022.

Pension benefits – this information has been subject to audit

Accrued pension at pension age as at 31 March 2026 and related lump (bands of £5,000)	Real increase in pension and related lump sum at pension age (bands of £2,500)	CETV at 31 March 2026	CETV at 31 March 2025	Real increase in CETV
		£000	£000	£000
John Kirkpatrick, Chief Executive				
80–85	0–2.5	1,738	1,630	10
Penny Hobman, Deputy Chief Executive				
35–40 plus a lump sum of 75–80	0–2.5 plus a lump sum of 0	701	650*	10

** Previously reported as 661 due to last years' calculation being pre-remedy.*

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 reflects the fact that membership between 1 April 2015 and 31 March 2023 has been rolled back into the PCSPS. This applies to the calculation of their cash equivalent transfer value and their single total figure of remuneration. 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. However, 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.

Pay multiples – this information has been subject to audit

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).

Agency workers in post at 31 March have been included in the pay ratio calculations. We have calculated the annual remuneration paid to agency staff based on an estimate of 222 working days at the interim's agency day rate (excluding VAT) less 25% to cover agency fees and employer's NICs.

	2025–26	2024–25	2025–26	2024–25
	Including bonus payments*	Including bonus payments*	Excluding bonus payments*	Excluding bonus payments*
Banded remuneration of the highest-paid director £	145,000 – 150,000	140,000 – 145,000	145,000 – 150,000	140,000 – 145,000
First quartile of pay £	46,067	44,530	46,067	44,509
First quartile ratio %	3.20	3.20	3.20	3.20
Median total remuneration £	46,449	44,784	46,139	44,509
Median pay ratio %	3.18	3.18	3.20	3.20
Third quartile of pay £	58,054	56,182	57,724	55,907
Third quartile ratio %	2.54	2.54	2.56	2.55
Range of banded remuneration for employees £	25,000 – 30,000 to 145,000 – 150,000	25,000 – 30,000 to 140,000 – 145,000	25,000 – 30,000 to 145,000 – 150,000	25,000 – 30,000 to 140,000 – 145,000

** No benefits in kind were received by any member of staff in either year. The highest paid director received a bonus in the range £0–£5k in 2025–26 which related to performance in 2024–25. The highest paid director did not receive a bonus in 2024–25.*

The banded remuneration of the highest-paid director in the financial year 2025–26 was £145,000 – £150,000 (2024–25: £140,000 to £145,000) including bonus payments. The highest paid director in the financial year was the Chief Executive. This was:

- 3.20 times (2024–25, 3.20 times) the first quartile of remuneration, which was £46,067 (2024–25 £44,530)
- 3.18 times (2024–25, 3.18 times) the median remuneration of the workforce, which was £46,449 (2024–25, £44,784)
- 2.54 times (2024–25 2.54 times) the third quartile of remuneration, which was £58,054 (2024–25, £56,182)

In 2025–26, no employee received remuneration in excess of that received by the highest paid director. This was the same in 2024–25.

The interim finance director (in post from March – July 2025) has been excluded from this calculation. This is because using a calculation based on the agreed rate multiplied by 222 working days would result in an annualised pay rate in excess of the highest-paid director, distorting the ratios and making the data incomparable year on year.

Change in total remuneration

	2025–26	2024–25	Change	% Change
Average pay including bonuses £	53,237	50,606	2,631	5.20
Average pay excluding bonuses £	52,951	50,352	2,599	5.16
Average bonus payment £	287	255	32	12.63
No of employees receiving a bonus	172	182	(10)	(5.49)

Average remuneration for all staff excluding bonuses increased by 5.16%, this was 3.25% for the highest paid director. The increase in average pay is attributed to a combination of the pay award for 2025–26 (average of 3.75%) and a change in the grade mix of the workforce.

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

No exit packages were paid in 2025–26 (one exit package was paid in 2024–25 in the band £50,000–£100,000).

A provision of £1.637 million has been made in 2025–26 in respect of an approved voluntary exit scheme. The provision amount is based on offers made to staff by 31 March 2026 and quotations received from Capita. Exits and associated compensation payments will take place in 2026–27.

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.

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 2026, earning £245 per day or greater	
No. of engagements as of 31 March 2026, one of these ended on 31 March	3

2024–25: there were two existing engagements as at 31 March 2025 which were less than 3 months.

Highly paid off-payroll worker engagements as at 31 March 2026, earning £245 per day or greater	
Number of off-payroll workers engaged during the year ended 31 March 2026	4
Of which:	
Not subject to off-payroll legislation	–
Subject to off-payroll legislation and determined as in-scope of IR35	4
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 2025 and 31 March 2026, the number of engagements which met the criteria set out in the previous table was 2.

Off-payroll engagements of Board members or senior officials with significant financial responsibility, between 1 April 2025 and 31 March 2026	
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.	12

2024–25: there were no off-payroll board members and the total number of Board members who served during the year was 13.

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 2026 is as follows:

	Female	Male	Total
Directors (SCS Grade 1–3 equivalent)	4	4	8
Other employees	108	58	166
Other employees (short-term workers)	7	2	9
Directors (SCS Grade 1–3 equivalent) loans inwards	1	1	2
Other employees (seconded / loans inwards)	1	–	1
Total	**121**	**65**	**186**
Interims and support workers	6	2	8

At 31 March 2026, 183 individuals were directly employed by the EHRC on a permanent or fixed-term basis (compared with 200 on 31 March 2025). Three employees were seconded to the EHRC from other government departments and there were no employees seconded or loaned out on 31 March 2026. Eight interim staff were engaged on 31 March 2026.

The average number of FTE (full-time equivalent) in post during the year is as follows:

	2025–26	2024–25
Permanently employed staff	164	179
Other		
Short-term contract staff	16	11
Inward secondments	2	2
Agency staff (contracted staff)	4	1
Total	**186**	**193**

The average number of FTE employees engaged during the year 2025–26 was 186 (193 in 2024–25), including seconded, loan or agency staff.

Staff costs – this information has been subject to audit

	2025–2026 Permanently employed staff	2025–2026 Others (agency and FTC)	2025–2026 Total	2024–2025 Total
	£000	£000	£000	£000
Wages and salaries	9,048	450	9,498	9,714
Social security costs	1,217	59	1,276	1,080
Apprenticeship levy	34	–	34	35
Pension costs*	2,592	130	2,722	2,801
Untaken annual leave**	(19)	–	(19)	(34)
Total staff costs	**12,872**	**639**	**13,511**	**13,596**
Agency staff	–	330	330	81
Total	**12,872**	**969**	**13,841**	**13,677**
Recoveries in respect of (outward) secondments***	–	–	–	(50)
Total costs (net of amounts recovered)	**12,872**	**969**	**13,841**	**13,627**

** Pension costs include Civil service pension scheme costs; 2025–26 £2,713k (£2,791k 2024–25) and partnership scheme costs; 2025–26 £9k (£10k 2024–25).*

*** Untaken annual leave represents the movement in the accrual based on the calculated cost of leave not taken at 31 March 2026.*

**** 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 decreased in 2025–26. Average working days lost (AWDL) per employee fell from 8.3 days at 31 March 2025 to 6.9 days at 31 March 2026. This improvement was primarily due to reductions in long-term sickness absence and mental health-related absence.

Time period	AWDL
2025–26 (as at 31 March 26)	6.9
2024–25 (as at 31 March 25)	8.3

Staff turnover

Employee turnover decreased during 2025–26. As at 31 March 2026, voluntary turnover was 9.0%, down from 13.1% at 31 March 2025. We continue to offer confidential exit interviews to colleagues who leave the organisation, which provides valuable insight into their reasons for leaving and helps inform action to improve our working environment, culture and relationships at work.

Time period	Turnover %
2025–26 (as at 31 March 26)	9.0
2024–25 (as at 31 March 25)	13.1

Employee engagement

Year	Employee Engagement Index
2025	–*
2024	52.5%
2023	–**

** In 2025, we introduced a new pulse survey approach to foster a culture of open communication, transparency and continuous improvement. This will gather more frequent and targeted feedback from colleagues to help us to track engagement trends more effectively and respond more quickly to issues raised. We did not conduct a full people survey. As a result, an engagement score was not calculated.*

*** In 2023, we conducted a number of mini surveys across the year and did not run a full people survey. As a result, an engagement score was not calculated.*

The Staff Forum provides a regular mechanism for colleagues from across the Commission to raise issues and share feedback on matters affecting the wider workforce. During the year, we reviewed and refreshed the Staff Forum Charter with forum members to clarify its purpose and focus.

We supported engagement and inclusion through our staff networks, mental health supporters and the HR Policy Hub, which enables colleagues to contribute to the development of workplace policies.

We continue to recognise and engage with the Public and Commercial Services Union and Unite.

Health and Safety

The health, safety and wellbeing of our staff, visitors and contractors working on our premises is of paramount importance. We have a well-established health and safety (H&S) policy and a functioning H&S Committee (which includes representation from recognised Trade Unions). We aim to create a positive culture of H&S awareness and incident reporting to support the continual review of control measures and to mitigate risks.

During 2025–26 and in response to audit recommendations, we commenced a H&S improvement programme 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.

Recruitment practices

Recruitment activity reduced during 2025–26, reflecting lower employee turnover and strategic planning to maintain an affordable workforce aligned to organisational priorities.

The use of recruitment agencies, including executive search providers, remained minimal throughout the year. We continued to apply our strengthened recruitment principles and, where appropriate, sought to support internal development and progression opportunities. This reflects our commitment to developing and retaining talent within the organisation.

In February 2026, we successfully renewed our Civil Service Commission recruitment accreditation. As part of the assessment, we demonstrated compliance with the Commission's statutory requirements, confirming that appointments are made on merit following fair and open competition.

We also continued to support inclusive recruitment through our commitments as a Disability Confident employer, including a guaranteed interview scheme for eligible disabled applicants and the provision of reasonable adjustments throughout the recruitment process.

Expenditure on consultancy

Consultancy spend during 2025–26 totalled £150,138 and related to work on the change programme, in particular to support technology improvements. Spend in this category was £7,842 in 2024–25.

People policies

A comprehensive suite of policies and procedures supports colleagues throughout their employment with EHRC. These policies are designed to be inclusive and to promote reasonable adjustments, flexible working and our commitment to be an inclusive family-friendly workplace culture.

In November 2025, we updated our parental leave procedure to include neonatal care leave, reflecting the introduction of new statutory neonatal care leave and pay rights from 6 April 2025.

In December 2025, we introduced a new sexual harassment policy and carried out a risk assessment which informed an agreed action plan. This provides clear guidance on what constitutes sexual harassment, explains reporting routes and sets out our responsibilities to prevent harassment. To support the policy, we provided training for all managers and colleagues on sexual harassment in the workplace. We have appointed Jonathan Parsons, a member of our People and Workspace Committee, as the representative of our sexual harassment policies and have a nominated officer.

In March 2026, we introduced a new career break policy, providing a clear framework for colleagues who wish to request an extended unpaid break from work for personal reasons. The policy supports colleagues to balance career development with personal responsibilities, while also helping us retain valuable skills and experience.

In March 2026, we also introduced a new baby loss and child bereavement policy, supported by manager guidance, to provide compassionate support to colleagues in these circumstances. The policy sets out the leave options available, explains the support we can offer and signposts colleagues to specialist support organisations. It reflects relevant legislative requirements and provides enhanced support.

We also updated our policies to reflect wider employment law changes coming into effect from 6 April 2026. This included provision for bereaved partner's paternity leave within our baby loss and child bereavement policy.

Diversity and inclusion

We are committed to promoting diversity and inclusion across our organisation. Over the past year, our workforce data continued to show strong representation in a number of areas, particularly among ethnic minority colleagues, women and disabled colleagues. We encourage colleagues to declare their protected characteristics so that we can maintain an accurate understanding of our workforce. As a relatively small organisation, even a small number of starters or leavers can have a noticeable effect on our workforce profile.

During 2025–26, we worked with our staff networks, staff groups and Staff Forum to improve employee experience and promote inclusion. This included lunchtime learning sessions on domestic abuse and suicide awareness, as well as providing training on disability in the workplace and deaf awareness.

Our Accessibility Working Group also continued to improve accessibility standards and support more inclusive digital content. We remain committed to embedding an inclusive culture and supporting disabled colleagues and candidates.

Health and wellbeing

During 2025–26, we continued to support colleagues' health and wellbeing through a range of practical measures and targeted support. This included offering an influenza vaccination to colleagues who were not eligible through the NHS, alongside wellbeing training and support on topics such as living with anxiety in uncertain times and practising resilience and self-care. Individual and group wellbeing support sessions were also available throughout the year.

We continued to provide access to a comprehensive Employee Assistance Programme and Occupational Health service, alongside support from our internal Mental Health Supporters, Domestic Abuse Allies, Menopause Champion and Wellbeing Staff Network. Colleagues also had access to support provided by the Charity for Civil Servants.

To support our menopause in the workplace policy, we delivered a lunchtime learning session with our menopause champion on the impact of menopause at work. We also marked World Menopause Awareness Day by signposting colleagues to internal resources, including the menopause workplace adjustment passport and a webinar on supporting colleagues experiencing menopause symptoms.

We continued to encourage colleagues to volunteer in their communities by offering up to three days' paid volunteering leave each year.

Learning and development

All colleagues have access to a broad range of learning and development opportunities to support their professional growth and contribution to the Commission's priorities. During 2025–26, we continued to invest in organisational capability by supporting colleagues to develop the skills and confidence needed to deliver effectively in their roles.

Our learning offer combined a core learning programme with a wider range of formal and informal development opportunities. This included targeted training in priority areas such as investigation skills, digital accessibility, professional and operational skills, and supporting and leading teams through change and uncertainty. Colleagues also accessed Civil Service Learning for mandatory training and wider developmental activity, alongside opportunities such as sponsored study and apprenticeships.

During 2025–26, a greater proportion of learning budgets was devolved to Directors, enabling more timely and targeted development aligned to individual, team and profession-specific needs. Directorates used these budgets to commission learning that reflected local priorities and capability requirements, complementing the core learning offer.

Alongside formal training, colleagues were able to access peer learning, mentoring, lunchtime learning and on-the-job development opportunities. Together, these approaches supported knowledge sharing across functions and disciplines and reflected our commitment to developing capability through a blend of formal learning, experience and learning from others.

Through this broad and flexible approach, we continued to strengthen professional capability and support effective delivery across our organisation.

Leadership and management development

During 2025–26, we continued to strengthen leadership and management capability across our organisation. We supported senior leaders, including colleagues at Civil Service Grade 6, through the Senior Principal Development Series, helping to build leadership confidence and support a strong pipeline for future senior roles. We also continued to offer an Aspiring Managers programme for colleagues preparing to take on management responsibilities.

Members of the Leadership Team also undertook targeted development, including learning on leading through change and uncertainty, and participation in the accredited Civil Service Leadership Standards programme. Coaching also continued to form an important part of our development offer, supporting senior colleagues in their ongoing leadership development. In addition, our regular away days provided further opportunities for collective learning, reflection and development across the leadership cohort.

This investment continues to play an important role in strengthening leadership capability and supporting a positive organisational culture.

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. The most recent full actuarial valuation of the scheme was carried out as at 31 March 2020. Details of this valuation can be found in the Cabinet Office: **Civil Superannuation resource accounts**.

In 2025–26, employers' contributions of £2,713,132 were payable to the PCSPS at one of four rates in the range 26.6% to 30.3% of pensionable pay, based on salary bands. In 2024–25, the total contribution was £2,791,287 and the range was 26.6% to 30.3%. 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 2025–26. 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 £273,242.

Employees can opt to open a partnership pension account, which is a stakeholder pension with an employer contribution. Employers' contributions of £8,993 (in 2024–25, this was £10,459) were paid to an appointed stakeholder pension provider. Employer contributions are age-related and range from 8.0 to 14.75 per cent (in 2024–25, this was 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 £532 or 0.5 per cent (in 2024–25, £539 or 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 £558. Contributions prepaid at that date were nil.

There were no early retirements on ill-health grounds (nor any in 2024–25).

Parliamentary accountability and audit report

This section summarises the 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 2025–26 that require disclosure in the Annual Report and Accounts (none in 2024–25).

Remote contingent liabilities

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

Indemnity for trustees of the Commission for Racial Equality Pension and Life Assurance Scheme (CREPLAS)

The government has indemnified the former trustees of CREPLAS against future personal liability claims in relation to their administration of the scheme to the extent that such claims are not covered by the trustee's private insurance. The financial impact of such claims is unquantifiable. Previously, a remote contingent liability for the indemnity was recognised in the Departmental (Cabinet Offices) annual report and accounts following a departmental minute presented to Parliament on 10 February 2022.

Special severance payments

No severance payments were made during the year.

Fees and charges

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

Government Functional standards

The EHRC has embedded the government functional standards within governance processes in a manner proportional to the EHRC's business needs and priorities.

Regularity of expenditure

All expenditure in 2025–26 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

2 July 2026

Parliamentary accountability and audit report

Certificate 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 2026 under the Equality Act 2006.

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

- Statement of Financial Position as at 31 March 2026;
- 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 2026 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 (2025)*. 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 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; and

- 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 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 and the Audit and Risk Assurance Committee 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

3 July 2026

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

Statement of accounts

1 April 2025 – 31 March 2026

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 Taxpayers' 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 2026, 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 2026. 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 together with the cash balance at 31 March 2026. The three principal sections are:

- Operating activities represent cash used in, or generated by EHRC's core activities, adjusted for non-cash items (e.g. depreciation).
- Investing activities reflect cash flows relating to the purchase or sale of long-term assets (e.g. the purchase of Property, plant and equipment PPE).
- Financing activities show how the EHRC is funded and include cash flows relating to interest payments.

Statement of accounts

Statement of Comprehensive Net Expenditure (SoCNE)

This statement is for the year ended 31 March 2026

	Notes	2025–2026 £000	2024–2025 £000
Income			
Operating income	3	(33)	(31)
Total operating income		**(33)**	**(31)**
Expenditure			
Staff costs	2	13,841	13,627
Board and Committee Fees and NIC's	2	228	198
Purchase of goods and services	2	3,672	3,361
Depreciation and impairment charges	2	566	699
Provision expense	2	1,651	(23)
Total operating expenditure		**19,958**	**17,862**
Net operating expenditure		**19,925**	**17,831**
Interest cost on pension scheme liabilities	11	52	57
Interest cost on leases (IFRS16)	12	14	18
Net expenditure for the year		**19,991**	**17,906**
Other comprehensive net expenditure			
Items which will not be classified to net operating costs:			
Net (gain) / loss on revaluation of property, plant and equipment	4	(51)	(6)
Actuarial loss / (gain) on pension scheme liabilities	11	–	(54)
Comprehensive net expenditure for the year		**19,940**	**17,846**

The notes on pages 157 to 190 form part of these accounts.

Statement of accounts

Statement of Financial Position (SoFP)

This statement shows our financial position as at 31 March 2026

	Notes	2025–2026 £000	2024–2025 £000
Non-current assets			
Property, plant and equipment	4	652	829
Intangible assets	5	5	10
Right of use assets	12	606	860
Trade and other receivables	8	26	36
Total non-current assets		**1,289**	**1,735**
Current assets			
Trade and other receivables	8	293	430
Cash and cash equivalents	7	646	179
Total current assets		**939**	**609**
Total assets		**2,228**	**2,344**
Current liabilities			
Trade and other payables	9	(1,367)	(1,343)
Lease liabilities	12	(269)	(269)
Exit provision	10	(1,637)	–
Pension liabilities	11	(112)	(108)
Total current liabilities		**(3,385)**	**(1,720)**
Total assets less current liabilities		**(1,157)**	**624**

Statement of accounts

Statement of Financial Position (SoFP)

This statement shows our financial position as at 31 March 2026 (continued)

		2025–2026	2024–2025
	Notes	£000	£000
Non-current liabilities			
Lease liabilities	12	(318)	(587)
Dilapidations provision	10	(310)	(296)
Pension liabilities	11	(888)	(948)
Total non-current liabilities		**(1,516)**	**(1,831)**
Total assets less total liabilities		**(2,673)**	**(1,207)**
Taxpayers' equity			
Revaluation reserve	SoCiTE	76	36
General reserve	SoCiTE	(2,749)	(1,243)
Total equity		**(2,673)**	**(1,207)**

The notes on pages 157 to 190 form part of these accounts.

John Kirkpatrick
Chief Executive and Accounting Officer

2 July 2026

Statement of accounts

Statement of Cash Flows (SoCF)

This statement is for the year ended 31 March 2026

	Notes	2025–2026 £000	2024–2025 £000
Cash flows from operating activities			
Net expenditure	SoCNE	(19,925)	(17,831)
Adjustments for non-cash transactions	SoCNE	566	699
Decrease in trade and other receivables	8	147	175
Increase in trade and other payables	9	24	46
Increase / (Decrease) in provisions	10	1,651	(23)
Pension payments	11	(108)	(113)
Lease movements not passing through the SoCNE		–	(2)
Movement in capital payables not passing through the SoCNE		(24)	16
Net cash outflow from operating activities (a)		**(17,669)**	**(17,033)**
Cash outflow from investing activities			
Purchase of property, plant and equipment (PPE) and intangible assets	4 & 5	(79)	(242)
Movement in capital payables		24	(16)
Net cash outflow from investing activities (b)		**(55)**	**(258)**

Statement of accounts

Statement of Cash Flows (SoCF)

This statement is for the year ended 31 March 2026 (continued)

		2025–2026	2024–2025
	Notes	£000	£000
Cash flows from financing activities			
Grant-in-aid received from sponsoring department	SoCiTE	18,474	17,546
Payments in respect of lease liabilities	12	(269)	(302)
Payments in respect of lease liabilities - interest	12	(14)	(18)
Net financing (c)		**18,191**	**17,226**
Net increase/(decrease) in cash and cash equivalents in the year (a+b+c)	**7**	**467**	**(65)**
Cash and cash equivalents at the beginning of the financial year	**7**	**179**	**244**
Cash and cash equivalents at the end of the period	**7**	**646**	**179**

The notes on pages 157 to 190 form part of these accounts.

Statement of accounts

Statement of Changes in Taxpayers' Equity (SoCiTE)

This statement is for the year ended 31 March 2026

	Notes	Revaluation reserve £000	General reserve £000	Total £000
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	11	–	54	54
Revaluation of PPE and intangibles	4 & 5	6	–	6
Transfer between reserves		(22)	22	–
Balance at 31 March 2025		**36**	**(1,243)**	**(1,207)**
Grant-in-aid received from sponsoring department – cash draw down	SoCF	–	18,474	18,474
Net expenditure for the year	SoCNE	–	(19,991)	(19,991)
Remeasurements - actuarial gain / (loss) on pension scheme liabilities	11	–	–	–
Revaluation of PPE and intangibles	4 & 5	51	–	51
Transfer between reserves		(11)	11	–
Balance at 31 March 2026		**76**	**(2,749)**	**(2,673)**

The notes on pages 157 to 190 form part of these accounts.

Statement of accounts

Notes to the financial statements for the period ending 31 March 2026

1.0 Accounting policies

The EHRC is a statutory non-departmental public body established by the Equality Act 2006. It is sponsored by the UK government's Minister for Women and Equalities and operates independently from government and Parliament. It 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 in this section. 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 2025–26 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 currently have offices in:

- **Manchester** – Arndale House, Arndale Centre, Manchester M4 3AQ
- **Cardiff** – Companies House, Crown Way, Cardiff, CF14 3UZ
- **Glasgow** – 140 West George Street, Glasgow, G2 2HG

Our London office licence was not renewed in January 2026 and we have signed an agreement to license office space in London from 1 April 2026.

1.1 Accounting convention

These financial statements have been prepared under the historical cost convention and where material, modified to account for the revaluation of property, plant and equipment to recognise non-current assets at their current value in existing use.

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 2026–27 financial year.

The EHRC has assumed that funding will continue beyond the 2026–27 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 any 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 sources of estimation uncertainty

When applying the accounting policies and preparing the financial statements, management is required to make certain judgements regarding complex transactions or those involving uncertain future events. This includes estimates and assumptions about the carrying amounts of assets and liabilities where this is not clear 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 main assumptions concerning the future and other sources of estimation uncertainty at the time of the statement of Financial Position.

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 impact 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. This uses factors such as changes in life expectancy and discount rates to calculate the scheme's total liability.

1.4 Newly issued IFRS not yet effective

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

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. It 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 impact of IFRS 19 on the public sector is still being assessed and an implementation date has not yet been confirmed.

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 sets out how employers should account for employee benefits. It prescribes rules for recognition and presentation of various types of benefits that employers provide to their employees. Short-term benefits are recognised as an undiscounted expense in the accounting period and include:

- staff salary costs which are recorded as an expense when the obligation arises
- performance payments unpaid at the end of the year, recognised on an accruals basis and 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 2026. The accrual is made at the salary rates applicable on the date the accrual is made.

1.7 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 pass 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.

1.8 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. These items include:

- contractual obligations that require payment for goods or services in advance of consumption (for example, building lease charges), in which case the cost is expensed over the period of the charge

- licence costs, subscriptions and maintenance agreements which are paid in full in advance, and are expensed across the duration of the agreement

1.9 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.

During 2025–26, amendments to IAS 16 were adopted which remove the requirement to revalue assets when carrying values materially differ from fair value. Property, plant and equipment are now valued using 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
- appropriate indices, for non-property assets only
- a revaluation every five years supplemented by a desktop revaluation in year 3, in rare circumstances where an index is not available

The EHRC does not hold any property assets. For non-property assets, producer price indices published by the Office for National Statistics, which are deemed to be the most appropriate valuation methodology available, are used to revalue assets.

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
- computer hardware, communications and networking equipment: 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 1.13)

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).

1.10 Intangible assets

Recognition

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

From 1 April 2025, the revaluation model for intangible assets was withdrawn. The carrying amounts of intangible assets at 31 March 2025 were deemed to represent historical cost and are subsequently measured at cost less accumulated amortisation and impairment.

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:

- 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

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).

1.11 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 we will be ordered to pay costs. We take on legal cases 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 within the agreement.

If a value is not provided within the agreement, the dilapidations provision is calculated using 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.

For exit provisions, a provision is made where an obligation exists to incur costs associated with an approved exit scheme. These provisions are based on an approved plan where there is an expectation that those identified as part of the scheme will exit the EHRC in a defined timeframe. The provision represents the best estimate of the costs required to settle the obligations.

HMT General provisions discount rates	2025–26	2024–25
Short-term: applied on cash flows from up and including five years from the date of the Statement of Financial Position	3.64%	4.03%
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	4.22%	4.07%

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.

1.12 Pensions

Current and former employees are covered by the provisions of the Principal Civil Service Pension Scheme (PCSPS) and the Civil Servants and Others Pension Scheme (CSOPS).

The defined-benefit elements of the scheme are unfunded and non-contributory except in respect of dependants' benefits. We recognise the expected cost of these elements on a systematic and rational basis over the period we benefit from employees' services. We do this by paying into the PCSPS/CSOPS, with 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 the former Chair of the EHRC and Chairs and Deputy Chairs of 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).

Actuarial gains and losses can arise from changes to actuarial assumptions when revaluing future benefits, and when actual experience differs from previous assumptions in respect of scheme liabilities and investment performance. In each case, the actuarial gains and losses are recognised directly in taxpayers' equity for the year.

1.13 Leases (as a Lessee)

IFRS 16 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

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. Cost is used 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 2026 calendar year, 5.32%
- for leases that commenced or are remeasured in the 2025 calendar year, 4.81%

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.

1.14 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.

1.15 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 Expenditure

	2025–2026	2024–2025
	£000	£000
Staff costs		
Total staff costs*	13,511	13,546
Agency staff	330	81
Board and Committee fees	228	198
Total staff costs	**14,069**	**13,825**
Purchase of goods and services		
Legal	875	380
ICT and telecommunications	667	704
Support and office services	455	334
Premises costs**	387	631
Staff support, recruitment and training	288	304
Travel and subsistence	234	251
Publication and information	219	194
Advisory services	171	248
Rentals under operating leases	126	70
Research and policy development	109	118
Auditor's remuneration***	88	87
Access to work	53	40
Total purchase of goods and services	**3,672**	**3,361**

** Further breakdown is included in Remuneration and staff report (**page 128**).*

*** Premises costs for 2024–25 now include the VAT element of IFRS 16 lease payments (£50k) which were previously reported within rentals under operating leases*

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

2 Expenditure (cont.)

	2025–2026	2024–2025
	£000	£000
Non-cash items		
Depreciation of property, plant and equipment	307	345
Amortisation of intangible assets	5	6
Depreciation Right of Use assets	254	348
Gain / Loss on disposal of ROU assets	–	–
Provision expense	1,639	(35)
Borrowing costs of provisions (unwinding of discount)	12	12
Total operating expenditure	**19,958**	**17,862**
Interest cost on pension scheme liabilities	52	57
Interest cost on IFRS16 Leases	14	18
Total net finance expenditure	**66**	**75**
Total expenditure	**20,024**	**17,937**

3 Income

	2025–2026	2024–2025
	£000	£000
Access to work scheme	28	23
Other income	5	8
Total income	**33**	**31**

4 Property, plant and equipment

2025–26	Leasehold improvement	IT and telecoms equipment	Furniture	Payments on account and assets under construction	Total
	£000	£000	£000	£000	£000
Cost or valuation					
At 1 April 2025	**1,090**	**1,062**	**384**	**–**	**2,536**
Additions in year	12	55	12	–	79
Reclassifications and transfers	–	–	–	–	–
Disposals	(17)	(162)	(10)	–	(189)
Revaluations	14	67	53	–	134
At 31 March 2026	**1,099**	**1,022**	**439**	**–**	**2,560**
Depreciation					
At 1 April 2025	**937**	**555**	**215**	**–**	**1,707**
Charge in year	29	244	34	–	307
Disposals	(17)	(162)	(10)	–	(189)
Revaluations	4	46	33	–	83
At 31 March 2026	**953**	**683**	**272**	**–**	**1,908**
Carrying value					
At 31 March 2025	**153**	**507**	**169**	**–**	**829**
At 31 March 2026	**146**	**339**	**167**	**–**	**652**

4 Property, plant and equipment (continued)

2024–25	Leasehold improvement	IT and telecoms equipment	Furniture	Payments on account and assets under construction	Total
	£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 Intangible assets

2025–26	Software	Total
	£000	£000
Cost or valuation		
At 1 April 2025	**385**	**385**
Additions	–	–
Disposals	–	–
Revaluations	–	–
At 31 March 2026	**385**	**385**
Amortisation		
At 1 April 2025	**375**	**375**
Charge in year	5	5
Disposals	–	–
Revaluations	–	–
At 31 March 2026	**380**	**380**
Carrying value		
At 31 March 2025	**10**	**10**
At 31 March 2026	**5**	**5**

5 Intangible assets (continued)

2024–25	Software	Total
	£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 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.

7 Cash and cash equivalents

	2025–2026	2024–2025
	£000	£000
At 1 April	**179**	**244**
Net change in cash and cash equivalent balances	467	(65)
Balance at 31 March	**646**	**179**

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

8 Trade and other receivables

	2025–2026	2024–2025
	£000	£000
Amounts falling due within one year		
Trade receivables	7	17
Prepayments	264	366
Accrued income	13	9
Rent deposit	9	38
Total falling due within one year	**293**	**430**
Amounts falling due after one year		
Prepayments	26	36
Total falling due after one year	**26**	**36**
Total receivables	**319**	**466**

9 Trade and other payables

	2025–2026	2024–2025
	£000	£000
Amounts falling due within one year		
Accruals	415	316
Trade payables	128	245
Other taxation and social security	314	253
Holiday pay accrual	233	252
Pension payments	276	275
VAT	1	2
Total falling due within one year	**1,367**	**1,343**

10 Provisions for liabilities and charges

	2025–2026			2024–2025
	Dilapidation provision	Exit provision	Total provisions	Dilapidation provision
	£000	£000	£000	£000
Balance at 1 April	**296**	**–**	**296**	**319**
Provided in year	–	1,637	1,637	–
Provisions not required / written back	–	–	–	(37)
Provisions utilised	–	–	–	–
Unwinding of discount rate	12	–	12	12
Change in discount rate	2	–	2	2
Balance at 31 March	**310**	**1,637**	**1,947**	**296**

Ageing of provisions	2025–2026			2024–2025
	Dilapidation provision	Exit provision	Total provisions	Dilapidation provision
	£000	£000	£000	£000
Not later than one year	–	1,637	1,637	–
Later than one and not later than five years	310	–	310	296
Later than five years	–	–	–	–
Total	**310**	**1,637**	**1,947**	**296**

The dilapidations provision relates to our contractual obligation to reinstate the Manchester office on our exit (currently December 2027). The provision is based on a professional valuation carried out by an independent surveyor in 2024.

The exit provision reflects costs associated with an approved voluntary exit scheme under our change programme. The provision is recognised based on applications received at 31 March 2026, and represents the best estimate of costs required to settle the obligations. The provision is expected to be utilised during 2026–27.

11 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 has calculated the scheme liabilities at 31 March 2026 using the financial assumptions in the following tables.

Assumptions %	31 March 2026	31 March 2025
	%	%
Rate used to discount scheme liabilities	5.60	5.15
Rate of inflation: Consumer Prices Index	2.55	2.65
Rate of increase for pensions in payment and deferred pensions	2.55	2.65

Liabilities	2025–26	2024–25
	£000	£000
Active members (past service)	–	–
Deferred pensioners	–	–
Current pensioners	1,000	1,056
Present value of scheme liabilities	**1,000**	**1,056**

Analysis of movement in scheme liability	2025–26	2024–25
	£000	£000
Balance at 1 April	**1,056**	**1,166**
Net interest – recognised in net expenditure for the year	52	57
Actuarial loss / (gain) – in other comprehensive expenditure	–	(54)
Less benefits paid	(108)	(113)
Present value of scheme liabilities	**1,000**	**1,056**
Ageing of liabilities		
Not later than one year	112	108
Later than one and not later than five years	481	448
Later than five years	407	500
Total	**1,000**	**1,056**

Actuarial gains/losses to be recognised in other comprehensive income	2025–26	2024–25
	£000	£000
Experience (gain) / loss arising on the scheme liabilities	50	(66)
Changes in assumptions underlying the present value of the scheme liabilities	(50)	12
Net total actuarial (gain) / loss stated in other comprehensive expenditure	**–**	**(54)**

Experience loss arising on the scheme liabilities amounted to £50,000 (this was a £66,000 gain in 2024–25). Changes in the demographic and financial assumptions underlying the valuation of the scheme have resulted in a gain to the scheme of £50,000 (this was a £12,000 loss in 2024–25). The total re-measurements were nil (a £54,000 gain in 2024–25) which is recognised directly in taxpayers' equity.

Experience loss / (gain) as a percentage of scheme liabilities	2025–26	2024–25
	£000	£000
Experience loss / (gain) arising on the scheme liabilities	50	(66)
Net present value of the scheme liabilities	1,000	1,056
Percentage of scheme liabilities at the year end	5.00	(6.30)

The defined benefit obligation (DBO) is calculated using a number of key actuarial assumptions. Due to the long-term nature of the scheme, the DBO is particularly sensitive to changes in these assumptions. The following table shows the impact of the change in assumptions.

Change in assumption		%	£000
Rate of discounting scheme liabilities	+ 0.5% a year	(4)	(37)
Rate of increase in CPI	+ 0.5% a year	4	36
Life expectancy – each member assumed 1 year younger than their actual age		3	32

Opposite changes in assumptions to those in the previous table 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 this table.

Current pensioners Exact age	31 March 2026		31 March 2025	
	Men (yrs)	Women (yrs)	Men (yrs)	Women (yrs)
60	26.6	28.6	26.5	28.5
65	22.0	23.7	21.9	23.6

12 Leases

IFRS 16 (Leases) is effective from 1 April 2023. It requires leases previously recognised as operating leases, along with new leases acquired that meet the requirements of IFRS 16, to be 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. No new agreements commenced in 2025–26. The licence on our temporary London office ended during the reporting period. The leases relate to premises at the locations shown on page 157.

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
Short Term	**Start**	**Ended**	**Term**
London (Tintagel House)	February 2025	January 2026	12 months

Right of Use assets 2025–26	Office leases
	£000
Cost or valuation	
At 1 April 2025	**1,477**
Additions in year	–
Disposals	–
Revaluations	–
At 31 March 2026	**1,477**
Depreciation	
At 1 April 2025	**617**
Charge in year	254
Disposals	–
Revaluations	–
At 31 March 2026	**871**
Carrying value	
At 31 March 2025	**860**
At 31 March 2026	**606**

Right of Use assets 2024–25	Office leases
	£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**

Lease liabilities

Total future lease obligations are given below:	2025–26	2024–25
	£000	£000
Office leases		
Not later than one year	247	284
Later than one year but not later than five years	335	566
Later than five years	24	40
Less interest element	(19)	(34)
Present value of obligations	**587**	**856**
Current portion	**269**	**269**
Non-current portion	**318**	**587**
Short term lease obligations	**–**	**104**

Lease elements within the Statement of Comprehensive Net Expenditure

Elements in the Statement of Comprehensive Net Expenditure	2025–26	2024–25
	£000	£000
Office leases		
VAT element of lease payments*	54	50
Expense relating to short-term leases*	126	70
Depreciation	254	348
Interest expense	14	18

** see note 2 – premises costs*

Cash outflow for leases

Total paid to Landlords in respect of lease payments	2025–26	2024–25
	£000	£000
Payment of principal lease cost	269	302
Interest	14	18
VAT	54	50
Total payment	**337**	**370**

13 Capital commitments

No capital commitments in excess of £5,000 exist as at 31 March 2026.

14 Contingent liabilities disclosed under IAS 37

At 31 March 2026, a contingent liability exists regarding one employment tribunal claim. An initial hearing is scheduled for summer 2026. No further information has been disclosed as this could be prejudicial to the outcome of the case. The inclusion of a financial estimate of this liability may be prejudicial to EHRC's interests and has not been disclosed. There were no contingent liabilities at 31 March 2025.

15 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, grant-in-aid funding of £18.474 million was received from the Cabinet Office. No other significant transactions have taken place.

The EHRC leases premises managed by the Government Property Agency (GPA), which is an executive agency of the Cabinet Office. Payments have been made to the GPA in respect of rent and other costs associated with the lease. 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 109 to 114**.

16 Events after the reporting period

Events after the reporting period are considered up to the date on which the Accounts are authorised for issue by the Accounting Officer, there are none to report.

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

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