# Make Work Pay Evaluation Framework

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Ipsos UK
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# 1 Executive summary

## Why this report was needed (the evaluation challenge)

The **Make Work Pay (MWP)** programme is the governments phased, overarching strategy for reforming the UK labour market, including implementation of the 2025 Employment Rights Act (ERA). The ERA comprises a large number of employment law reforms spanning multiple policy areas. Together, these aim to improve job quality, strengthen employment protections, reduce labour market inequalities and insecurity and support people to remain in work. It represents one of the most significant packages of employment rights reforms in a generation.

Many of the individual reforms will be evaluated separately. However, evaluating policies in isolation will not provide sufficient evidence to understand whether the programme as a whole has achieved its overarching aims. A programme-level approach is therefore required to understand how the reforms work together, identify synergies and unintended consequences, and assess their collective contribution to change.

This report was commissioned to provide a strategic framework capable of supporting programme-level evaluation over time. It is intended to complement, rather than replace, individual policy evaluations by providing the overarching structure to assess the implementation, contribution and value for money of MWP as a whole.

## What this report delivers

To address the challenge of evaluating a complex and evolving programme of labour market reforms, this report sets out a strategic evaluation framework for MWP.[1] The framework is designed to support consistent evidence generation throughout implementation while recognising that different reforms operate through distinct causal pathways and are expected to produce outcomes over different timescales. Specifically, the report provides:

**A programme-level Theory of Change** (ToC), bringing together the six reform themes into a single overarching framework that explains how the programme is expected to contribute to improved job quality, labour market participation, productivity, growth, health and wellbeing, and reduced inequality and insecurity.

- **Six theme-level logic models (or lower-level ToCs)**, describing the mechanisms through which groups of related reforms are expected to generate change, including the assumptions, dependencies and interactions that underpin delivery.
- **A strategic evaluation framework**, setting out recommended approaches to process, impact and value for money evaluation, together with appropriate methods for assessing programme-level contribution.

[1] This report focuses on the ERA measures that were more developed at the time of the study rather than all the reforms in the ERA and MWP more broadly. Table 2.1 provides a full list of ERA reforms that were included in this study.

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- **Recommendations on data and evidence**, identifying existing data sources, highlighting evidence gaps and proposing priorities for future primary data collection and research to strengthen programme-level evaluation.
- **A phased evaluation timeline**, aligning evaluation activities with the implementation timetable and the expected timing of outputs, outcomes and longer-term impacts.

## Key recommendations

The report makes four overarching recommendations for the evaluation of the MWP programme.

1. **Evaluate MWP as a programme, not solely as a collection of individual reforms.** While policy-level evaluations are essential, they should be complemented by a programme-level evaluation capable of assessing how reforms interact and collectively contribute to the programme's overarching objectives. By bringing together evidence from across individual policy evaluations and carrying out specific evaluation activities at the programme level the Government will be better equipped to use robust evidence to inform future labour market policy and the design of subsequent employment reforms.

2. **Adopt a phased evaluation strategy aligned with implementation.** The reforms are being introduced over several years and are expected to generate outcomes over different timescales. Evaluation should therefore progress from implementation and early behavioural change to longer-term outcomes, impacts and value for money as evidence becomes available.

3. **Use a theory-based approach to assessing programme impact.** MWP is a complex, nationwide programme and it does not readily lend itself to the establishment of a credible counterfactual. As a result, contribution analysis provides an appropriate overarching approach for assessing the extent to which MWP has contributed to observed changes. This should be supported by qualitative and quantitative evidence to gather in depth insights on both 'what' programme impacts and 'why' and 'how' they are occurring.

4. **Build an integrated evidence base from multiple sources.** Programme-level evaluation should combine administrative datasets, existing surveys and targeted primary research to understand implementation, behavioural change, differential impacts, unintended consequences and value for money. This evidence should use the programme-level ToC to provide a coherent assessment of programme performance.

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# 2 Introduction and Programme Overview

The Make Work Pay (MWP) programme is a comprehensive programme of reforms first articulated in 2024[2] aiming to modernise UK employment rights.[3] MWP is being delivered in phases, with the Employment Rights Act (ERA) 2025 representing the first phase of delivery.[4] The phased implementation of reforms is intended to give employers, businesses and workers time to plan and prepare.

The 2025 ERA was developed in close collaboration with business and trade unions and is key to MWP. It intends to bring employment protections into the 21st century, extending safeguards already offered by leading British employers to millions more workers across the country.[5] The ERA and consequently MWP, seeks to fundamentally modernise the world of work to create a fairer, more productive labour market that tackles low pay, poor working conditions and poor job security, whilst also growing the economy and boosting wages.[6]

The Department for Business, Innovation, Science and Trade (BIST, formerly the Department for Business and Trade, DBT) commissioned Ipsos UK to conduct a Monitoring and Evaluation scoping study for the MWP programme in December 2025. Given the scale and complexity of this programme of reforms, a robust evaluation framework is essential to guide future evaluation across the MWP programme.

This section provides a brief introduction to the MWP programme. It also introduces the framework which aims to help understand:

- What questions provide the most insightful lessons regarding implementation;
- What activities and outputs should be monitored to inform the programme-level evaluation;
- What and when outcomes and impacts could be captured to determine the success of MWP;
- What data sources exist to capture outcomes and impacts and how available is the data;
- What methods are suitable to deliver a robust evaluation of the MWP programme.

## 2.1 Rationale for Make Work Pay

Whilst headline employment and unemployment rates appear strong by historical standards, millions of workers remain stuck in low paid, insecure and poor-quality work.[7] This reflects wider evidence that labour market performance cannot be assessed through employment rates alone. Recent policy analysis argues that a focus on job entry without consideration of job quality can lead to insecure, low-paid and unsustainable employment, with implications for wellbeing, progression

[2] Labour Party (2024). Labour's Plan to Make Work Pay. Available at: https://labour.org.uk/wp-content/uploads/2024/06/MakeWorkPay.pdf
[3] Labour Party (2024). Next Steps to Make Work Pay. Available at: https://www.gov.uk/government/publications/next-steps-to-make-work-pay/next-steps-to-make-work-pay-web-accessible-version#introduction
[4] DBT (2026). Plan to Make Work Pay and Employment Rights Act: timeline update, GOV.UK, updated 15 April 2026. Available at: https://www.gov.uk/government/publications/implementing-the-plan-to-make-work-pay-and-employment-rights-act/plan-to-make-work-pay-and-employment-rights-act-timeline-update
[5] Labour Party (2024). Labour's Plan to Make Work Pay. Available at: https://labour.org.uk/wp-content/uploads/2024/06/MakeWorkPay.pdf
[6] DBT (2024). Factsheet: Employment Rights Act 2025 – Overview, October 2024. Available at: https://www.gov.uk/government/publications/employment-rights-bill-factsheets
[7] UK Government (2026). Employment Rights Act 2025: Economic Analysis, DBT. Available at: Employment Rights Act 2025: economic analysis

and productivity. A growing body of evidence therefore emphasises the importance of "good work" as a policy objective alongside labour market participation[8].

Around four million UK workers in 2025 were estimated to be in insecure employment such as zero hours, agency, or casual work (25% higher than in 2011).[9] These roles typically lack predictable income, stable hours, and progression routes, which affects retention, wellbeing, and household spending power.[10] Estimates indicate that in 2022/23 around 1–1.3 million employees in the UK earned below the Lower Earnings Limit (LEL) set as an eligibility criterion for Statutory Sick Pay (SSP), which offers financial protection during sickness absence.[11]

The economic landscape is further complicated by over a decade of wage stagnation, with real earnings only marginally higher than in 2010.[12] This prolonged stagnation has eroded living standards and financial resilience, particularly for part-time and temporary workers.[13] At the same time, businesses have reported persistent labour shortages in recent years.[14] This combination of stagnant pay and unfilled roles points to a labour market that is not functioning efficiently for either workers or employers, with structural barriers. The 2025 Good Work Index suggests UK job quality remains broadly stable, with persistent weaknesses in health, workload, development and progression.[15]

Compounding these pressures is the UK's persistent "productivity puzzle" - output per hour worked has stagnated,[16] reflecting weak growth compared to peer economies. The previous industrial relations framework, shaped by the Trade Union Act 2016[17] and Strikes (Minimum Service Levels) Act 2023,[18] has increased procedural complexity and constrained early dispute resolution,[19] contributing to over two and a half million working days lost to strikes in 2023 before falling to 733,000 in 2024 and 740,000 in 2025.[20]

Finally, enforcement of core rights such as the minimum wage, holiday pay and agency worker protections are fragmented and under-resourced.[21] There is also evidence of non-compliance with

[8] Jones, K. (2025). *Putting good work at the centre of employment policy.* Decent Work and Productivity Research Centre, MetroPolis.
[9] Klair, A. (2025). *The scale of insecure work in the UK*. Trades Union Congress (TUC).
[10] Tims, S., Belfield, C., & Aref-Adib, C. (2026). *Weak income growth leaves people with little resilience to shocks*. York: Joseph Rowntree Foundation. Available at: https://www.jrf.org.uk/cost-of-living/weak-income-growth-leaves-people-with-little-resilience-to-shocks
[11] Department for Work and Pensions (2024). *Improve Access to Statutory Sick Pay by Removing the Lower Earnings Limit and Removing the Waiting Period* (Final Stage Impact Assessment), 21 October 2024, p.11. Available at: https://assets.publishing.service.gov.uk/media/6715f848386bf0964853d848/Impact_assessment_improve_access_statutory_sick_pay_removing_lower_earnings_limit_removing_waiting_period.pdf
[12] Cominetti, N. & Slaughter, H. (2024). *Job done? Assessing the labour market since 2010 and the challenges for the next government*, Resolution Foundation, 25 June 2024. https://doi.org/10.63492/yms156. Available at: https://www.resolutionfoundation.org/publications/job-done/
[13] Tims, S., Belfield, C., & Aref-Adib, C. (2026). *Weak income growth leaves people with little resilience to shocks*. York: Joseph Rowntree Foundation. Available at: https://www.jrf.org.uk/cost-of-living/weak-income-growth-leaves-people-with-little-resilience-to-shocks
[14] British Chambers of Commerce (2026). Recruitment Challenges Continue to Stall Hiring - British Chambers of Commerce. As of 13 June 2026.
[15] CIPD (2025). CIPD Good Work Index 2025: Survey report. The Chartered Institute of Personnel and Development.
[16] Office for National Statistics (2026). *Productivity flash estimate and overview, UK: January to March 2026 and October to December 2025*. Released 19 May 2026. Available at: https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/labourproductivity/articles/ukproductivityintroduction/januarytomarch2026andoctobertodecember2025
[17] BEIS (2016). Trade Union Act 2016: Enactment stage impact assessment.
[18] Strikes (Minimum Service Levels) Act 2023, c. 39. Available at: https://www.legislation.gov.uk/ukpga/2023/39/enacted
[19] Dukes, R. (2026). 'Collective Rights and the Employment Rights Act 2025: Continuity and Change in the British Labour Constitution', *Industrial Law Journal*. Available at: https://doi.org/10.1093/indlaw/dwaq009
[20] Office for National Statistics (2023). Labour disputes; working days lost due to strike action; UK (thousands), 12 months ending March 2023.
[21] House of Commons (2023). Post-pandemic economic growth: UK labour markets. Tenth Report of Session 2022–23. Business, Energy and Industrial Strategy Committee (accessed on 13 July 2026).

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an estimated 445,000 workers were paid below the National Minimum Wage in 2025,[22] 2.2 million jobs may not have annual leave,[23] and 900,000 workers a year have holiday pay withheld, worth £2.1 billion.[24]

[22] DBT (2026). *National Minimum Wage Low Pay Commission Report 2025*. Available at: https://assets.publishing.service.gov.uk/media/69b941c526909a1423961249/E03534727_NMW_LPC_Report_2025_Accessible_Corr_Slip.pdf
[23] Resolution Foundation (2026). *The Resolution Foundation Labour Market Outlook Q1 2026.* Available at: https://www.resolutionfoundation.org/app/uploads/2026/04/LMO-Q1-2026.pdf
[24] Wilkinson, E. (2026). *Today marks a once in a generation opportunity to transform employment rights – but we need ambition, transparency and focus*, Trust for London, 7 April 2026. Available at: https://trustforlondon.org.uk/news/whats-needed-fair-work-agency/

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## 2.2 The Make Work Pay package

The Government's Plan to MWP, delivered in part through the Employment Rights Act[25] and related reforms[26] were organised by BIST into six interconnected themes (see Table 2.1).

**Table 2.1: Key reforms under each theme of the MWP programme**

| Themes | | | | | |
|---|---|---|---|---|---|
| **Family Friendly Rights** | **Fair Pay** | **Insecure Work** | **Equality at Work** | **Enforcing Rights at Work** | **Voice at Work** |
| **Policies** | | | | | |
| 1. Making flexible working the default<br>2. New right to unpaid bereavement leave<br>3. Day 1 right to protected time off work to grieve a pregnancy loss before 24 weeks<br>4. Day 1 right to paternity leave and unpaid parental leave<br>5. Enhanced protection against dismissal for pregnant women and mothers returning from maternity leave. | 6. Improve access to SSP by removing the Lower Earnings Limit and waiting period<br>7. Strengthen existing tipping law<br>8. Establish a Fair Pay Agreements process in the social care sector | 9. Reforming zero hours and similar contracts through new rights to guaranteed hours, reasonable notice of shifts, and payment for shifts cancelled, curtailed or moved at short notice<br>10. Extending protections against unfair dismissal<br>11. Strengthening collective redundancy rights<br>12. Strengthening protections against fire and hire practices | 13. Requiring large employers to publish Equality Action Plans covering gender and the menopause<br>14. Whistle-blowing protections against sexual harassment<br>15. Requiring employers to take all reasonable steps to prevent sexual harassment of their employees<br>16. Requiring employers to not permit the harassment of their employees by third parties | 17. Establish the Fair Work Agency (FWA)<br>18. Employment Tribunal (ET) time limits | 19. Strengthening workers' rights to trade union access, recognition and representation<br>20. Repeal Strikes (Minimum Service Levels) Act 2023<br>21. Repeal Trade Union Act 2016<br>22. Creating a modern framework for industrial relations |

Source: BIST, April 2026
Note: The table presents a large number of major ERA reforms. These reforms were selected because they were the most developed at the time of the study and therefore formed the primary focus of the analysis. A full list of ERA reforms, along with the wider Plan for MWP reforms, is provided in Appendix 1.

[25] Employment Rights Act 2025, c. 36. Available at: https://www.legislation.gov.uk/ukpga/2025/36
[26] BIST (2026). *Plan to Make Work Pay and Employment Rights Act: Timeline Update*, updated 15 April 2026. Available at: Plan to Make Work Pay and Employment Rights Act: timeline update - GOV.UK

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## 2.3 Purpose of and audience for the evaluation framework

The purpose of this evaluation framework is to provide HM Government (HMG)[27] with a coherent approach for assessing MWP as a programme of reforms rather than as a collection of individual policies. While individual policy evaluations will generate important evidence on the implementation and effects of specific reforms, they are not designed to assess how the reforms interact, reinforce one another, or collectively contribute to the overarching objectives of the MWP programme.

The framework therefore adopts a programme-level perspective, taking a top-down approach that starts with the outcomes and impacts MWP seeks to achieve across the labour market and works backwards to identify the evidence required to assess progress towards these objectives. This complements the bottom-up evidence generated through individual reform evaluations which various Government departments, including BIST and DWP, will continue to carry out. These focus on the implementation and impacts of specific policies. Together, these two approaches (i.e. top-down and bottom-up) provide a more complete understanding of programme performance than either could achieve in isolation.

A key feature of the framework is the inclusion of a theme-level perspective, which acts as a bridge between individual reforms and programme-level outcomes. The themes provide a mechanism for understanding how related reforms combine to contribute towards common objectives and how outcomes arising from individual policies aggregate to generate broader programme-level change.

The framework aims to:

- Articulate the programme and theme-level Theories of Change (ToCs), including the outcomes and impacts MWP seeks to achieve and the causal pathways through which change is expected to occur;
- Identify the indicators, measures and data sources required to assess progress towards intended outcomes and impacts, including where primary data collection may be required;
- Establish a proportionate and phased approach to evidence collection that reflects the staggered implementation of reforms and differing timescales over which outcomes are expected to emerge;
- Recommend an appropriate programme-level evaluation approach capable of assessing the contribution of MWP to observed outcomes and impacts;
- Provide a structure for bringing together evidence from individual policy reform evaluations and programme-level analysis into a coherent assessment of the overall programme.

This report can be used by; HMG policy colleagues to understand how their individual work will be incorporated into the programme level evaluation, HMG senior staff to understand what is required to effectively evaluate MWP, and broader stakeholders to understand the paths to impact of MWP and its potential unintended consequences. The evidence generated through the framework is intended to support different decisions as the programme matures: informing early improvements

[27] BIST commissioned this framework and leads the programme-level evaluation of MWP. However, several reforms are implemented by other government departments and bodies. This report therefore refers to HM Government (HMG) when describing the users of the framework and those acting on its findings, and to BIST when describing the department's specific role in commissioning or leading the evaluation.

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to implementation, identifying emerging risks and unintended consequences, and, over the longer term, supporting judgements about whether and how MWP has contributed to its intended outcomes and whether it represents value for money.

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# 3 Methodology

To build a holistic understanding of the programme, the team conducted a range of activities: evidence reviews, theme-level workshops, a programme-level workshop, data review, expert advisor consultations and other relevant additional consultations. This involved engaging cross-government policy and analytical teams, central agencies and regulators, external academic and wider expert communities.

This study focussed on the six themes and their most developed ERA reforms at the time of the study (as detailed in Table 2.1).[28] Further reforms are planned at the programme level; however, these were not sufficiently advanced at the time of the research to be included in the scope of this work.

## 3.1 Evidence reviews

Initially the team conducted six targeted evidence reviews – each focused on a single theme and the relevant reforms (see Table 2.1). The sources consulted were identified through the search strategy which Ipsos and BIST agreed-upon, which prioritised government and regulatory body publications, reports from think tanks and research institutes, literature identified through expert recommendation, and targeted web-searching. In total, the team reviewed more than 150 documents (for the full list see Appendix 2), including:

- BIST's existing theme- and programme-level logic models;
- Published impact and options assessments for individual reforms;[29][30]
- Make Work Pay Economic assessment;[31]
- Make Work Pay government documentation, such Labour's manifesto, policy papers and factsheets;
- Guidance documentation by third parties, such as Advisory, Conciliation and Arbitration Service (Acas) and Chartered Institute of Personnel and Development (CIPD), and international organisations, such as Organisation for Economic Co-operation and Development (OECD);
- Academic and grey literature, including think tank and charity publications, such as from the Work Foundation and Fawcett Society.

Using a structured template, reviewers mapped causal pathways, potential unintended consequences, and key enablers and barriers across the reforms, and assessed the strength of the supporting evidence. The reviews also examined interactions across themes, identifying where reforms may be complementary or in tension. The reviews also identified relevant indicators,

[28] By focusing on the programme level, the study provides a framework through which the contribution of future MWP reforms can be captured as they come into effect.
[29] UK Government (2026). *Employment Rights Act 2025: Economic Analysis*. Available at: https://www.gov.uk/guidance/employment-rights-bill-impact-assessments
[30] UK Government (2026). *Consultations and documents from Make Work Pay*. Available at: https://www.gov.uk/government/collections/make-work-pay
[31] UK Government (2026). *Employment Rights Act 2025: Economic Analysis*. Available at: https://www.gov.uk/guidance/employment-rights-bill-impact-assessments

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documented how these indicators have been measured historically, and catalogued available data sources. Finally, the reviews set out methodological considerations to inform the evaluation framework.

The reviews synthesised evidence at the theme-level, providing a better understanding of interactions and tensions across reforms to build on BIST initial theme-level logic model. These new drafts added more detailed and nuanced inputs, activities, outputs, outcomes, and impacts.

## 3.2 Theme-level workshops

Six workshops were held, one for each theme, using the relevant evidence reviews as the foundation for workshop materials. These materials summarised the initial understanding of pathways, intended outputs, outcomes and impacts, and potential data sources, ensuring attendees were not asked to duplicate existing work. The workshops were organised in partnership with BIST and brought together policy leads and analysts involved in the design, implementation, or analysis of reforms within each theme.

The workshops helped to formulate early feedback and reach consensus on theme-level causal chains, intended outcomes and impacts, and evidence needed to support the evaluation. Discussions were pitched at the theme level, rather than the level of individual reforms, so that the outputs would remain valid even as new reforms are added over time. For example, outcomes agreed at the theme level should still apply to any new reforms introduced under that theme in future, even if those reforms are not yet confirmed or implemented.

Participants were asked to comment on proposed indicators and measurement approaches, or suggest alternatives, and to discuss baselining requirements, expected timelines for when implementation may complete, and when outcomes and impacts were likely to start emerging, and those affected (e.g., specific sectors or groups). They also helped identify available and preferred data sources, and flagged evidence gaps and feasibility constraints. These workshops also helped understand the work different teams were conducting for individual reforms, and what data collection this involved. This allowed the study to factor in externally planned data collection, ensuring work was not duplicated and resources were used optimally.

## 3.3 Programme-level workshop

The findings from the theme-level workshops were synthesised through a programme-level workshop, which explored cross-theme linkages, identified the principal drivers of programme-level outcomes and impacts, and examined potential synergies, trade-offs and unintended consequences across the MWP programme.

As at the theme-level, the programme-level workshop was organised in partnership with BIST. This brought together relevant heads of policy, policy leads and lead analysts (some of whom attended theme-level workshops), as well as colleagues from internal strategy and communications teams, and HMRC.

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This workshop adopted a top-down, programme-wide perspective to integrate the theme-level work into a coherent programme-level logic. The workshop materials built on all knowledge gathered to date, presenting programme-level proposed outputs, outcomes and impacts, causal pathways, interconnections across themes and early systems mapping (visualising identified links across themes – see Section 4.2), alongside practical elements, such as possible data sources and timelines.

Workshop attendees were invited to discuss the materials which led to clarifications on; the programme's intentions and expectations, strengthened understanding of which mechanisms are most likely to drive outcomes and impacts, and set out indicative timelines for when these effects are likely to materialise, including where specific themes were expected to deliver earlier or later results. It allowed for an understanding of when programme-level baselining could be implemented with associated baseline indicators.

Participants also identified the most relevant indicators for monitoring, discussed data availability of suggested and new sources, and signalled their preferred data sources. In addition, the evaluation methodology was discussed, exploring quasi-experimental design (QED) options and theory-based approaches. Attendees were invited to propose priority evaluation questions to ensure the evaluation addressed their needs.

## 3.4 Data review

Information from the evidence reviews, and discussions at the workshops, informed a targeted data exploration. This involved firstly reviewing several administrative datasets to understand exactly which metrics and measures are relevant to the agreed outcomes and impacts for each theme, and the programme overall. The review analysed publication frequency of each metric determining how frequently each metric could be monitored and when would be appropriate to establish and collect a relevant baseline. It also explored any limitations that may exist within the datasets and metrics, and potential alternative measures. See Section 5.3.4 for more detail on findings from the data review.

In instances where administrative data were inadequate or irrelevant for certain metrics, we noted the primary data collection planned by each relevant policy team as part of their reform evaluations. Where gaps were not covered by either administrative datasets or existing primary data collection plans, additional primary data collection was proposed with suggested questions for surveys or interviews to ensure all outcomes can be measured consistently.

This work resulted in a comprehensive indicator framework for each theme and an overarching framework at the programme level with an assigned Red, Amber, Green (RAG) rating to illustrate which measures and data were most suitable and practical for use. **Green** indicators had good coverage and frequency, were aligned with outputs, outcomes or impacts. **Amber** indicators had acceptable coverage and frequency and were suitable proxies but less directly aligned with outputs, outcomes or impacts. **Red** indicators had limited availability, infrequent collection, or weak

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alignment and were therefore not recommended for use. Indicators were also classified as **core** (primary measures) or **supplementary** (supporting measures).

## 3.5 Expert advisor consultations

We engaged a panel of seven academic advisers with subject expertise on the reforms and research methodologies. These were consulted at multiple stages.

First, each adviser commented on the evidence reviews, helping ensure that relevant sources had been comprehensively scoped and offering initial feedback on the causal pathways and mechanisms of change. They then reviewed the draft theme-level logic models to confirm that activities and causal pathways were accurately mapped, and that additional assumptions, risks and unintended consequences had been considered. They also recommended additional data sources where appropriate. The advisers also contributed to the systems mapping (see Section 4.2 for more detail), helping interpret the links, synergies, tensions and dependencies across the MWP themes.

Finally, they reviewed the draft programme-level logic model and indicator framework and suggested improvements to help ensure completeness, accuracy, and consistent terminology.

## 3.6 Follow up consultations

Given the breadth of stakeholders involved in implementing and delivering MWP, we also conducted several hour-long consultations with stakeholders external to BIST. These were more limited than initially anticipated due to the level of involvement at the workshops which provided extensive feedback from a range of stakeholders. We sought to develop a holistic view of the theme- and programme-level logic by using these consultations to test and refine the causal pathways and ensure intended and unintended consequences were captured. We also used these consultations to explore any other relevant datasets or data collection activities.

Stakeholders consulted included representatives from:

- Department for Health and Social Care (DHSC);
- Cabinet Office - Office for Equality;
- Advisory, Conciliation and Arbitration Service (Acas);
- Trade Union Congress (TUC);
- CIPD.[32]

[32] The study team has approached other non-government stakeholders. However, not all of them were able to take part in these consultations.

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# 4 Programme Logic

This section sets out the logic underpinning the MWP programme drawing on the evidence reviews, stakeholder workshops and expert engagement. At the theme level, each group of reforms is represented by a logic model that describes the principal causal pathways through which the reforms are expected to collectively contribute to intended outputs, outcomes and impacts. These logic models provide a structured representation of how change is expected to occur within each theme, including key assumptions, dependencies and potential tensions, with tension links highlighting where reforms may create competing incentives or lead to opposing outcomes.

To complement this, Section 4.2 presents a systems map that illustrates the principal relationships between the themes and the wider MWP objectives, helping to situate each theme within the overall programme.

While the logic models focus on the causal pathways within individual themes, the programme-level Theory of Change (ToC)[33] provides a broader explanation of how the six themes are collectively expected to contribute to the overarching objectives of the MWP programme. It places the reforms within their wider policy and labour market context, makes explicit the assumptions and external factors that may influence delivery and outcomes, and provides the overarching narrative that links the individual themes into a coherent programme-level framework.

## 4.1 Theme-level logic models

### 4.1.1 Fair Pay

The Fair Pay theme aims to improve fairness, financial security and minimum employment standards by strengthening income protections, increasing transparency in workplace pay practices, and supporting fair pay and conditions. Collectively, these reforms seek to improve job quality, reduce financial insecurity and improve workforce stability, particularly for workers in lower-paid sectors and occupations.

The Fair Pay theme brings together three distinct reforms:

1. Changes to SSP;
2. Consultation and transparency requirements for workplace tipping policies;
3. The introduction of Fair Pay Agreements (FPA) in social care.[34]

The Fair Pay reforms begin with a series of implementation activities undertaken by Government, employers and workers. Government introduces the necessary legislation, publishes guidance and advice to support implementation, and works with stakeholders to facilitate the implementation of the reforms. Employers familiarise themselves with the new requirements, update workplace

[33] A Theory of Change is one step further than a logic model and explains why and how an initiative will achieve its long-term goals by mapping the complex causal pathways and assumptions and placing it in context. A logic model exclusively maps the sequencing of intended activities and outcomes.
[34] In England, the FPA will be limited to adult social care; in Scotland and Wales it will include adult and children's social care.

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policies and practices, implement the necessary changes within their organisations and, where relevant, exercise these rights or participate in consultation and negotiation processes. Employees become aware of their new rights and protections and, where relevant, exercise these rights or participate in consultation and negotiation processes. Within adult social care in England, government subsequently establishes the Fair Pay Agreement process and Adult Social Care Negotiating Body, creating the institutional arrangements required to negotiate sector-wide minimum pay and employment conditions.

The most immediate effects are expected to be improved access to rights and stronger workplace protections. SSP reforms allow more employees to qualify for sick pay and receive support from the first day of absence, reducing the financial risks associated with taking time off when ill. The tipping reforms increase transparency and worker consultation over how tips are distributed, while the adult social care reforms establish a mechanism for negotiating minimum pay and employment conditions across the sector. Collectively, these changes are expected to improve perceptions of fairness, strengthen financial security, and give employees a greater voice in decisions affecting their employment.

Over time, these changes are expected to influence workplace behaviours and outcomes. Employees who are better paid, more financially secure and treated more fairly are expected to experience higher job satisfaction and lower levels of stress and insecurity. In the case of SSP, greater access to sick pay should reduce presenteeism, support recovery from illness and help people remain in work rather than leaving the labour market due to poor health.[35] [36] In adult social care, improved pay and conditions are expected to make the sector more attractive, helping employers recruit and retain staff[37] and ultimately improving continuity and quality of care.[38] More broadly, evidence suggests that improved financial security, wellbeing, pay and job quality are associated with lower turnover[39] [40] and greater workforce stability.[41] These pathways are supported by evidence from related policy areas, particularly adult social care and paid sick leave research. In comparison, the evidence for SSP is more indirect, as there was less UK-based research available; thus, the evidence for SSP is drawn primarily from European and North American studies of paid sick leave access, rather than changes to eligibility and waiting periods.

In the longer term, the combined effect of these reforms is expected to contribute to broader economic and social objectives. By helping people remain in work, reducing turnover, improving workforce stability and supporting better health and wellbeing, the reforms are expected to contribute to higher productivity and economic growth while also reducing inequality. For adult

[35] Hill, H. D. (2013). Paid sick leave and job stability. *Work and occupations*, *40*(2), 143-173.
[36] Vander Weerdt, C., Stoddard-Dare, P., & DeRigne, L. (2023). Is paid sick leave bad for business? A systematic review. *American Journal of Industrial Medicine*, *66*(6), 429-440.
[37] Allan, S. & Vadean, F. (2021). The association between staff retention and English care home quality. Journal of Aging & Social Policy, 33(6), 708-724.
[38] Allan, S. & Vadean, F. (2023). The Impact of Wages on Care Home Quality in England. *The Gerontologist*, 63(9), 1428-1436.
[39] Williamson, G. J., & Munyon, T. P. (2024). More Costs of Insecurity: Turnover as a Consequence of Worker Financial Insecurity. In *Academy of Management Proceedings* (Vol. 2024, No. 1, p. 15454). Valhalla, NY 10595: Academy of Management.
[40] Vander Weerdt, C., Stoddard-Dare, P., & DeRigne, L. (2023). Is paid sick leave bad for business? A systematic review. *American Journal of Industrial Medicine*, *66*(6), 429-440.
[41] Sears, L. E., Shi, Y., Coberley, C. R., & Pope, J. E. (2013). Overall well-being as a predictor of health care, productivity, and retention outcomes in a large employer. *Population health management*, *16*(6), 397-405.

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social care specifically, stakeholders highlighted that improved pay and retention could support a larger and more stable workforce, helping to improve care quality and meet growing demand. However, the extent to which these benefits are realised will depend on the negotiated agreements, their successful implementation, wider labour market conditions and the time required for some reforms - particularly adult social care Fair Pay Agreements - to take full effect.

These pathways are not automatic and there are important risks to monitor. Employers may respond to higher costs or new requirements by tightening absence management, reducing recruitment, restructuring roles, offsetting costs elsewhere, or becoming more cautious about hiring workers perceived as high-risk. Smaller employers may find the administrative and financial burden harder to absorb. In adult social care, higher pay and standards could improve retention, but only if funding and commissioning arrangements enable providers to meet new requirements sustainably.[42] Without this, there is a risk of pressure on provider viability, reduced service capacity, or increased strain on remaining staff with possible implications for future public expenditure on adult social care. Understanding these potential unintended consequences will be an important part of the evaluation.

[42] Atkinson, C., Ullah, A., Woodhams, C., Whittaker, W., Arif, S., Guillaume, C., Willocks, K. & Hebson, G. (2024). Pay in adult social care: How much does it vary and why does it matter? Manchester University.

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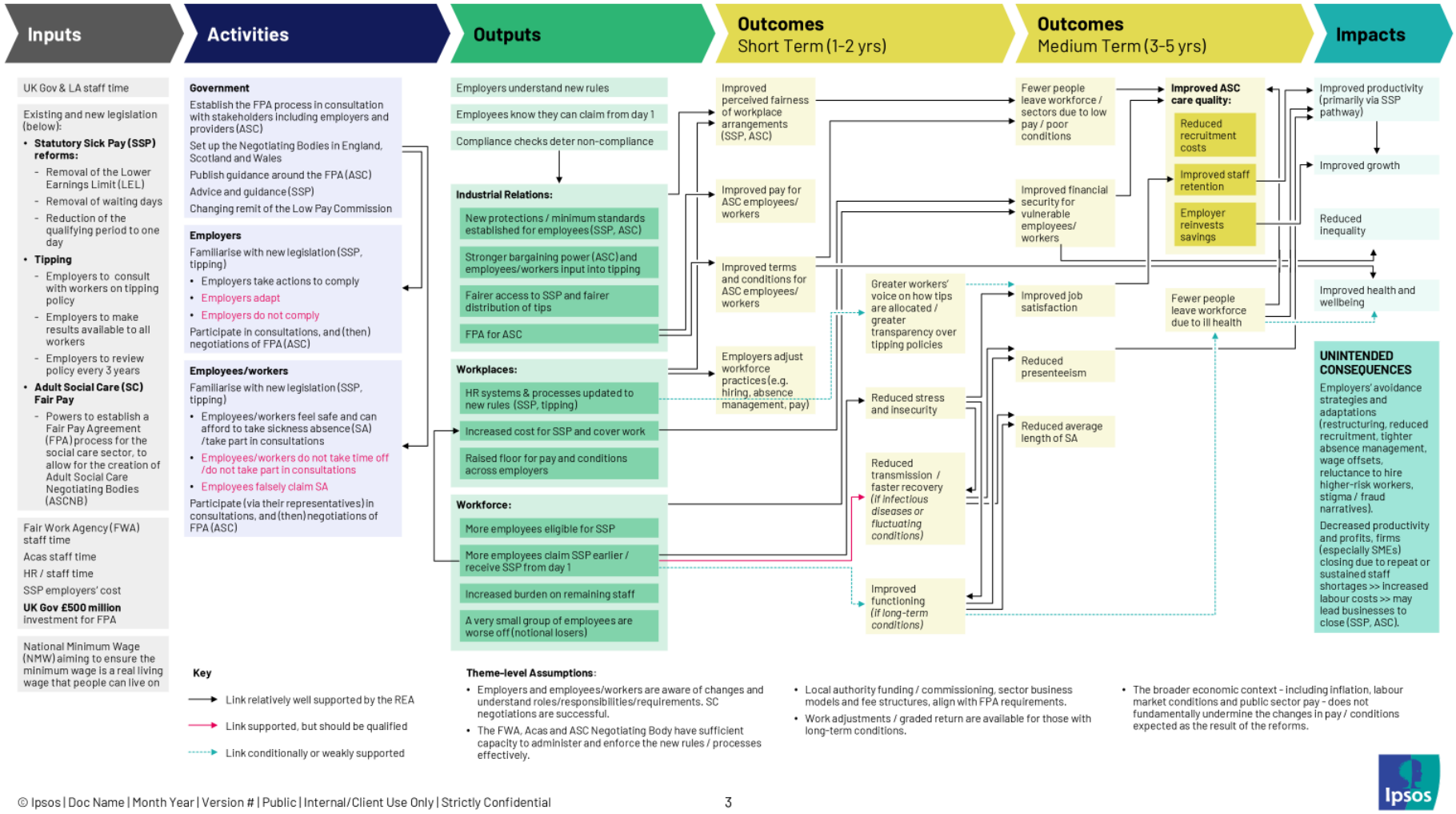
## Figure 4.1: Fair Pay




Source: Authors' elaboration, 2026

Note: While informed by the DHSC and DWP logic models developed for the SSP reforms and Adult Social Care Fair Pay, this model is not an exact replica and does not represent the full detail captured at the individual reform level.

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### 4.1.2 Insecure Work

The insecure work theme aims to improve job security and strengthen employment protections by reducing insecure working practices, increasing the predictability of work and earnings, and enhancing safeguards against unfair dismissal and detrimental changes to employment terms. Collectively, these reforms seek to provide greater certainty, fairness and stability in employment while supporting more secure and sustainable employment relationships. There are four key aims of the reforms introduced by the Insecure Work theme:

- Increase the protections against collective redundancies;
- Establish a baseline of security and stability for workers facing unpredictable hours;
- Increase job security by extending protections against unfair dismissal;
- Prevent unscrupulous fire and rehire practices used to make changes to certain core employment terms.

The policies associated with Insecure Work are detailed below:

1. **Collective redundancies protections:** There are two core changes in the collective redundancies' legislation. The first aims at doubling the financial penalty[43] if an employer fails to consult appropriately in case of collective dismissals. The second expands the threshold that triggers the duty to consult, set to be implemented in April 2027. Currently, the duty to consult is triggered only if employers propose 20 or more dismissals 'at one establishment'.[44] In addition to the current threshold for consultation in one establishment, the new rules will set a trigger to collectively consult if a certain number of redundancies are proposed across an entire organisation (i.e. including more than one establishment).
2. **Change in qualifying period for protection against unfair dismissals:** Taking effect from the 1st of January 2027, changes include reducing the qualifying period for protection against 'ordinary' unfair dismissal and the qualifying period for employees' right to request written reasons for dismissal from two years to six months. The cap on compensatory awards will also be removed.
3. **Fire and rehire protections:** The new protections introduced from March 2027, will make it an automatic unfair dismissal to dismiss an employee in order to change specified core terms,[45] unless the employer meets a narrow exemption for financial difficulties. It will also be an automatically unfair dismissal for an employer to dismiss their employees in order to replace them with non-employees (for example, agency workers) to do substantially the same work. Non-restricted variations will be subject to separate enhanced protections that seek to ensure employers engage in meaningful consultation and fair negotiations with employees and their representatives.

[43] As of the 6th of April 2026, the penalty has changed from 90 day's pay per affected employee to 180 days' pay per employee.
[44] Where establishment is defined as a single site or workplace.
[45] Core terms include: reductions to pay, changes to total hours, reductions to leave entitlement, changes to pensions, and specified shift pattern changes, and are referred to as restricted variations. Non-restricted variations will be subject to separate enhanced protections that seek to ensure employers engage in meaningful consultation and fair negotiations with employees and their representatives.

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4. **Ending one-sided flexibility - reforms of zero hours and similar contracts:** The ERA 2025 tackles one-sided flexibility by ensuring all jobs provide a baseline of security and predictability. The government has taken this forward through three measures in the ERA 2025, giving eligible workers the right to:
    a. Guaranteed hours, where the number of hours offered reflects the hours worked by a qualifying worker during a reference period;
5. Reasonable notice of shifts and changes to shifts;
6. Payment for shifts cancelled, cut short or rescheduled at short notice.[46]

The details of Insecure Work reforms related to reforms of zero hours and similar contracts, including details relating to eligibility, the length of reference periods or the definition of reasonable notice and short notice, among other things, will be defined following consultation and will be set out in regulations.

The mechanisms through which the policies outlined in this section will deliver their intended outcomes begin with legislative and communicative actions by HM Government. This includes progressing secondary legislation, publishing updated Codes of Practice, and disseminating guidance on the new rules. Employers, in turn, are expected to undertake several preparatory activities. These include:

- Familiarising themselves with the new legislative requirements;
- Updating internal performance management and dismissal processes;
- Delivering HR training on statutory compliance;

Identifying workers eligible for the rights;
Reviewing and updating processes, payroll and workforce rostering systems;

- Ensuring that payments are made to workers where required.

While businesses will encounter increased employment costs, they are expected to benefit from a better-organised workforce, improvements to worker wellbeing, increased retention and improved worker engagement. For example, formal collective consultations are projected to increase, ensuring large-scale redundancies are subject to greater scrutiny. As protections increase it is anticipated that there will be fewer involuntary job separations, leading to a reduced turnover rate in the labour market. Consequently, employers may be incentivised to invest more in their existing workforce.

For workers, the immediate outputs include:

- Enhanced communication and consultation between trade unions and worker representatives (when present), and employers;

[46] UK Government (2026). Employment Rights Act 2025.

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- More secure work at the beginning of employment tenure through expanded protections against unfair dismissal
- Increased contractual stability through limiting the imposition of downgraded terms through fire and rehire practices;
- More predictable earnings and working hours, whilst retaining the option to remain on flexible arrangements if preferred.

In the short term, the Insecure Work policies are expected to significantly enhance statutory protections.[47] By reducing the qualifying period to claim unfair dismissal, protecting contractual terms and providing predictable working conditions, workers are expected to be better able to plan their lives effectively and enjoy greater job stability.[48] [49] This increased income security should alleviate stress and anxiety for workers in roles previously deemed highly insecure. Conversely, employers will likely face higher operational costs,[50] prompting them to exercise greater diligence and foresight regarding dismissal, hiring and shift scheduling decisions.[51] Employers are likely to consider potential future costs when making dismissal decisions, thereby potentially incentivising investment in existing workforce upskilling. Furthermore, the new rights to reasonable notice of shifts and payments for shifts cancelled, curtailed or rescheduled at short notice is intended to improve workforce planning, albeit with a reduction in last-minute scheduling flexibility.

Overall, in the medium term, this new statutory framework should foster improved employer-employee/ workers relations, improve financial security, establish fairer contractual terms,[52] and create a workplace culture where workers are confident that they are treated fairly.

In the long term, these changes are expected to translate into an amplified worker voice, facilitated by consultations between employers and worker representatives. The labour market should see a decrease in staff turnover and a corresponding rise in retention rates, particularly within traditionally insecure sectors (e.g., hospitality, social care, and retail).[53] Ultimately, this enhanced security is expected to drive improved health and wellbeing[54] [55]among the workforce, which in turn should lead to higher overall productivity.

The implementation of the Insecure Work policies carries potential unintended consequences and adaptations. We will monitor these unintended consequences, and engage with employers and Public Services in order to mitigate them. Possible unintended consequences include:

[47] Bogg, A. & Ford, M. (2024). "From fairness at work to Making Work Pay: a preliminary assessment of the Employment Rights Bill". UK Labour Law
[48] Navani, A. & Florisson, R. (2024). "No progress? Tackling long-term insecure work". Work Foundation.
[49] Florisson, R. (2025). "Increasing Job security? The potential impact of employment rights reforms in the UK". Work Foundation
[50] CIPD (2025). The (unintended) consequences of the Employment Rights Bill. CIPD report.
[51] Institute of Directors policy paper (2024). Labour's Plan to Make Work Pay. Insights from employers.
[52] Bogg, A. & Ford, M. (2024). "From fairness at work to Making Work Pay: a preliminary assessment of the Employment Rights Bill". UK Labour Law
[53] Navani & Florisson (2024). "No progress? Tackling long-term insecure work". Work Foundation.
[54] Balogh, R., Dix, G., Harris, J., Toro, C. & Warhurst, C. (2025). The case for creating health jobs: A review of the evidence. ReWAGE Evidence Paper.
[55] Williams, G., Navani, A. & Leka, S. (2025). "A divided Work force? Worker views on health and employment in 2025". Work Foundation

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- **Potentially altered recruitment processes:** As dismissal protections and general administrative burden increases, employers may change their recruitment processes, potentially slowing overall hiring rates.
- **Possible employer responses to avoid new requirements:** Employers may try and change their practices in response to their new duties. This may result in less zero hours contracts for those who require them. Regardless of whether these avoidance mechanisms are lawful or not, they could result in increased insecurity for workers.
- **Possible costs to businesses:** The set of reforms introduced by the Insecure Work theme, may increase employment-related costs, risks and constraints for some employers, potentially leading to changes in hiring practices, workforce restructuring and changes in business activity. We are implementing policy reforms in phases to avoid undue burden to businesses and are proactively engaging with businesses throughout implementation to further understand and mitigate these risks through appropriate support offers.

Through strong monitoring and evaluation activities we will seek to address any of these potential unintended consequences at an early stage to mitigate any potential negative impacts. This will also ensure that the reforms are implemented as intended to facilitate a wide range of positive outcomes, including improved employer-employee/ workers relations, improved financial security and fairer contractual terms, as identified in the logic model below.

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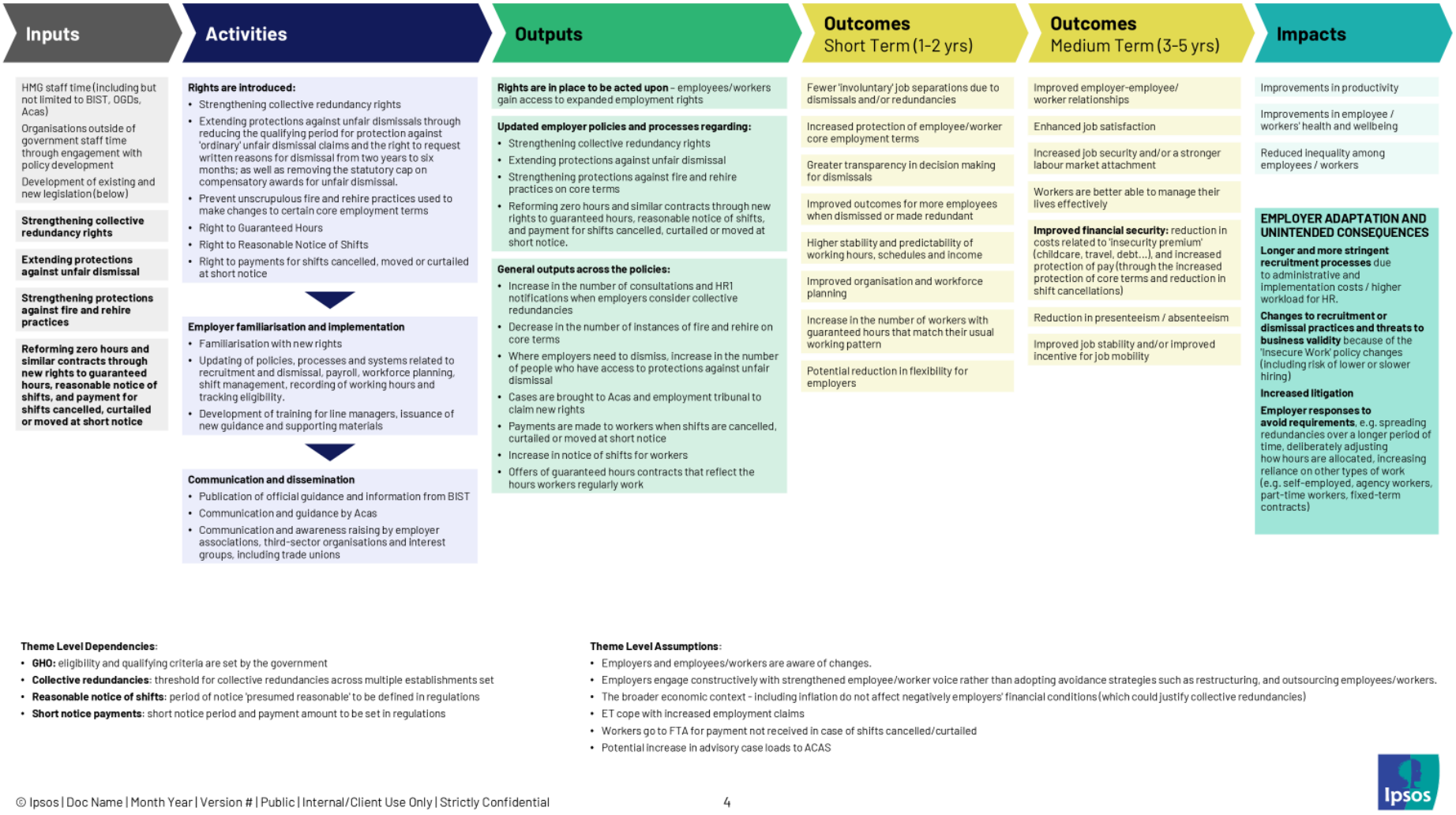
## Figure 4.2: Insecure Work




Source: Authors' elaboration, 2026

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### 4.1.3 Equality at Work

The Equality at Work theme aims to create safer, fairer and more inclusive workplaces by strengthening legal protections against harassment and discrimination, improving accountability for employers, and promoting greater equality in employment. Collectively, these reforms seek to improve workplace culture, increase worker confidence and wellbeing, and reduce inequalities across the labour market.

The Equality at Work theme contains four main reforms:

1. Sexual harassment is an automatically protected disclosure under whistleblowing law.
2. All employers have a legal duty to take 'all reasonable steps' to prevent the sexual harassment of their employees.
3. All employers must take 'all reasonable steps' not to permit third-party harassment of their staff.
4. Businesses with 250+ employees must publish action plans to address inequality in the business. Two of the actions must be related to: reducing the gender pay gap and supporting those experiencing the menopause.[56]

These reforms operate through one overarching pathway and two more specific sub-pathways:

- **Equality at Work** – the theme-level pathway, common to all four reforms.
- Harassment prevention – covering the whistleblowing protection, the duty to take 'all reasonable steps' to prevent sexual harassment, and the obligation to protect staff from third-party harassment.
- Action plan pathway – covering the requirement on employers with 250+ employees to publish Action Plans.

The **Equality at Work** causal pathway begins with Government and key bodies such as Acas and the Equality and Human Rights Commission (EHRC) providing clear legislation, guidance and communications so that employers are not only aware of the reforms but understand what they must do to comply. These reforms explicitly make employers responsible for promoting equality and preventing harm, rather than relying on individual employees to raise and resolve issues. For this pathway to operate as intended, employers must familiarise themselves with the new requirements and communicate them to their workforce, so that employees understand what the reforms mean in practice and how the reforms apply to them.

In the short term, assuming employers engage meaningfully with the new duties, organisations will begin to scrutinise their existing policies and practices to bring them into line with the reforms. This process of review generates organisational learning about where current approaches fall short or already work well. Where these insights are then embedded into updated policies and procedures, company standards should rise over the medium term, in line with the broader aims of the MWP

[56] UK Government (2026). Creating an action plan: guidance for employers

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programme. As employers share not only the new policies but also, where appropriate, the rationale and learning behind them, transparency is expected to increase. This transparency is both internal and, because action plans are published, external which may impact prospective employees. This, in turn, should strengthen employees' trust and confidence, as they have greater clarity about what is changing, why it is changing, and how it will be applied.[57] Because the reforms under this theme focus specifically on equality, including women regarding harassment and employees experiencing the menopause, employees may also perceive fairer treatment both from their employer and relative to their peers. More open discussion of these previously sensitive topics is expected to begin to normalise them and reduce stigma.

A strong ethical climate, signalled by visible leadership, clearer standards alongside consistent application of the new policies, is expected to raise employees' expectations of their employers.[58] Staff will increasingly anticipate that employers will act on the reforms, comply with their duties and take concerns seriously. Where this expectation is met, trust and confidence are reinforced, supporting a virtuous cycle of transparency, engagement and culture change. If, however, employees see little evidence of meaningful implementation, there is a risk that confidence in the reforms erodes and this causal pathway stalls, with staff concluding that "nothing will change" despite the new legislation. Where the pathway functions as intended, improved company standards, greater employee confidence and perceptions of fair treatment are expected to contribute to better workplace culture and improved employee wellbeing.

The harassment prevention pathway operates within this broader equality framework but focuses specifically on preventing harassment. If the new legal protections are implemented meaningfully more employees will be effectively protected from harassment.[59] This matters across the economy, but the most pronounced changes are expected in settings with high levels of customer facing or third-party interaction, such as hospitality, retail, transport and health and social care.[60] As protections and expectations are clarified, employees are likely to have greater expectations of their employers' role in preventing and responding to harassment, activating the same mechanisms of increased responsibility, transparency and trust described above. Ultimately, this pathway aims to reduce the incidence of harassment and discrimination and, in doing so, improve employee wellbeing.[61]

The action plan pathway uses the same underlying mechanisms and follows the same broad sequence as the core Equality at Work pathway but is focused on the development and implementation of gender and menopause related action plans in larger organisations. It assumes that, alongside policy updates, employers will diagnose specific organisational issues and set out concrete actions to address them. In doing so, it anticipates the creation of more formal channels and spaces through which marginalised employees can raise issues, shape priorities and see their

[57] Rawlins, B. (2008). Measuring the relationship between organizational transparency and employee trust.
[58] Lilly, J., Duffy, J. & Wipawayangkool, K. (2016). The Impact of Ethical Climate on Organizational Trust and the Role of Business Performance: If Business Performance Increases, Does Ethical Climate Still Matter? *Journal of Behavioural and Applied Management*, 17(1)
[59] Dobbin, F. & Kalev, A. (2016). Why Diversity Programs Fail. And What Works Better. *Harvard Business Review*
[60] Eurofound (2015). *Violence and harassment in European workplaces: Extent, impacts and policies*. Dublin
[61] Diez-Canseco, F., Toyama, M., Hidalgo-Padilla, L. & Bird, V. (2022). Systematic Review of Policies and Interventions to Prevent Sexual Harassment in the Workplace in Order to Prevent Depression. *International Journal of Environmental Research and Public Health*, 19(20)

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concerns reflected in tangible commitments. When combined with improved company standards and a stronger ethical climate, these action plans are expected to contribute to a more inclusive workplace, promoting greater gender equality and reducing potential gender disparities. [62]

The Equality at Work theme faces several barriers that may limit how far the three pathways achieve their intended outcomes, and create some unintended consequences. There is a risk of regulatory and administrative burden, particularly for resource constrained employers (e.g. small- and medium-sized employers, SMEs), which may prompt defensive reactions, resistance, or box ticking approaches rather than genuine engagement with equality and prevention. Despite decades of formal antiharassment policies and reporting mechanisms, harassment remains in many workplaces,[63] suggesting that new rules risk being largely symbolic unless accompanied by strong enforcement, accountable leadership and a positive ethical climate. Finally, there is a risk of non-compliance which will render all pathways infeasible. This theme may enhance businesses HR capabilities given the expected reviews of current policies and workings. In this review, businesses may also go further than is required and look at other diversity policies. This could possibly inspire SMEs to undertake similar reviews to their 250+ counterparts, though these will be capacity constrained.

For the harassment prevention pathway specifically, lack of clarity over "all reasonable steps" which will vary by employer to employer and will depend on factors such as (but not limited to) the employer's size, the sector within which it operates, the working environment and its resources, alongside uneven enforcement could mean that protections are not as effective, especially in high-risk, customer facing sectors. For the action plans pathway, there is a risk that plans are superficial and do not address the causes of gender inequality. There are also limitations on enforcement when it comes to action plans to be implemented in practice, which limits their ability to have impact.

[62] Bazeley, A., Marren, C., & Shepherd, A. (2022). Menopause and the workplace. *Fawcett Society*.
[63] Johnson, P., Widnall, S., & Benya, F. (2018). Sexual harassment of Women: Climate, Culture, and Consequences in Academic Sciences, Engineering, and Medicine. *National Academic Press (Washington, DC.)*

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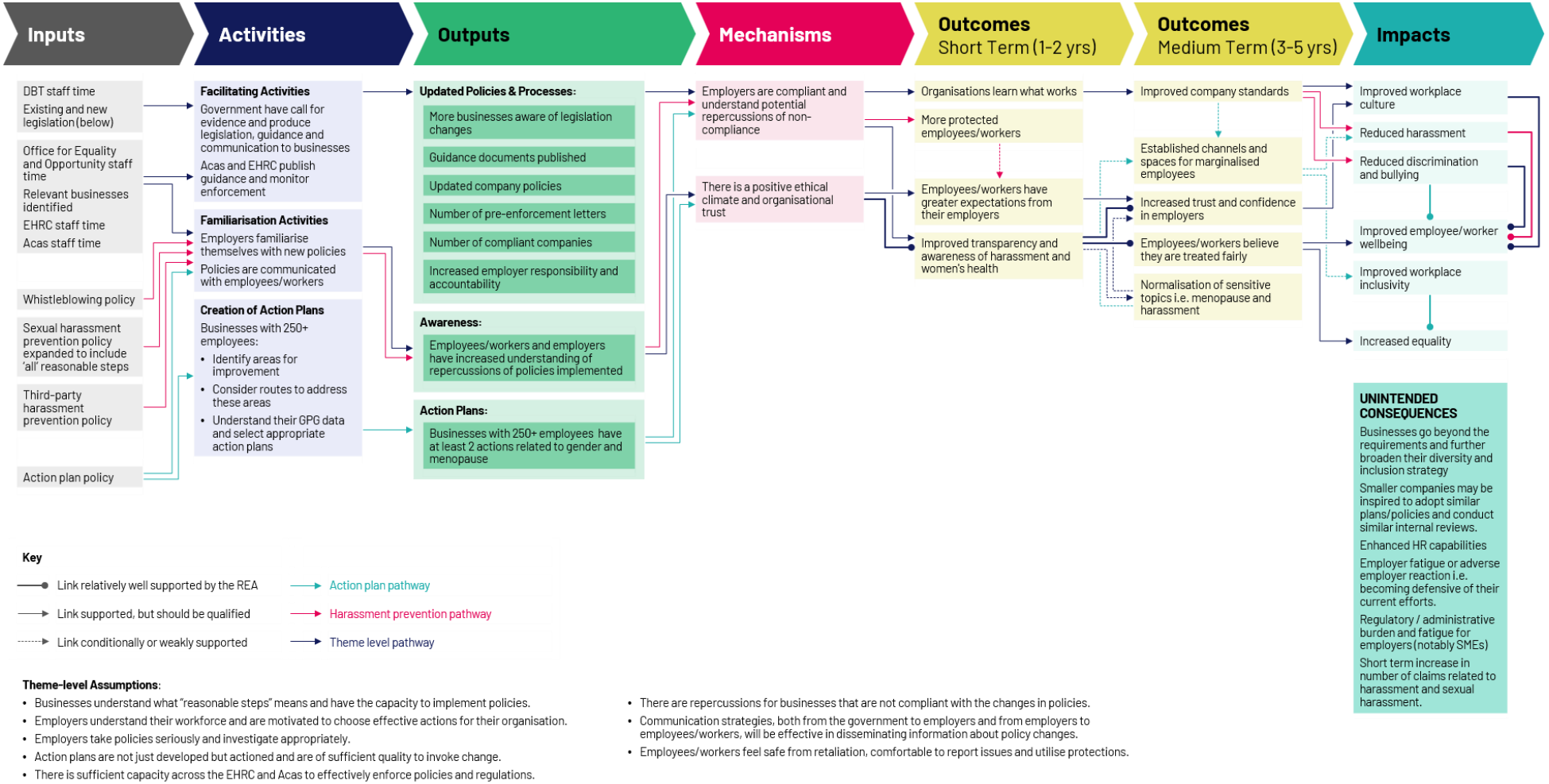
## Figure 4.3: Equality at Work




**Theme-level Assumptions**:

- Businesses understand what "reasonable steps" means and have the capacity to implement policies.
- Employers understand their workforce and are motivated to choose effective actions for their organisation.
- Employers take policies seriously and investigate appropriately.
- Action plans are not just developed but actioned and are of sufficient quality to invoke change.
- There is sufficient capacity across the EHRC and Acas to effectively enforce policies and regulations.
- There are repercussions for businesses that are not compliant with the changes in policies.
- Communication strategies, both from the government to employers and from employers to employees/workers, will be effective in disseminating information about policy changes.
- Employees/workers feel safe from retaliation, comfortable to report issues and utilise protections.

Source: Authors' elaboration, 2026

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### 4.1.4 Voice at Work

Policies within the Voice at Work theme aims to strengthen workers' voice and participation in the workplace by promoting effective collective bargaining, improving trade union access and recognition, and supporting more collaborative industrial relations. Collectively, these reforms seek to increase workers' ability to engage in collective bargaining should they wish to do so, and foster more cooperative and stable industrial relations.

The Voice at Work theme brings together a set of reforms aimed at rebalancing the relationship between workers and employers. The core reforms include:

1. Repealing the Trade Union Act 2016 and Repealing the Strikes (Minimum Service Levels) Act 2023.
2. Introducing a new right for trade unions to access workplaces and simplifying the recognition process

Although these reforms operate through different mechanisms, they share a common purpose: strengthen collective bargaining and foster more cooperative and stable industrial relations.

The most immediate effects are expected to flow through two distinct but related pathways. The first operates through bargaining power: reducing restrictions on trade union activity will ensure that unions are better able to represent their members, including representing them and negotiating on their behalf with the employer on matters like pay, working conditions and learning and development. This strengthened bargaining power is anticipated to lead to benefits for workers and resolve disputes early.

The second pathway operates through voice and representation. Reforms simplifying trade union recognition processes, introducing statutory workplace access rights, and establishing a duty to inform workers of their right to join a union[64] are each expected to lower specific barriers to membership and collective organisation. Simpler recognition processes reduce the procedural costs of establishing bargaining arrangements; workplace access rights allow unions to reach workers who may otherwise have limited exposure to collective representation; and the information duty helps to address the awareness gap that evidence suggests contributes to low membership, particularly among younger workers.

Together the bargaining power and voice pathways are expected to strengthen workers' negotiating position and effectiveness. Over time, stronger collective bargaining and more effective worker voice are expected to produce improvements in pay, working conditions, job quality, and worker wellbeing. There is evidence to support this with unionised workplaces being more likely to have systematic disciplinary procedures, fewer dismissals, and lower rates of dispute escalation.[65] [66]

[64] Regulatory Policy Committee (2025). RPC opinion: Duty to inform workers of the right to join a union.
[65] Wood, S., Saundry, R., & Latreille, P. (2014). *Analysis of grievance and disciplinary procedures using WERS 2011.* Acas Research Report.
[66] TUC (2014). How unions make work better and society fairer

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Equally, workers who experience greater control over their working conditions and feel their voice is heard are expected to report lower stress and insecurity, with multiple studies linking weak or ineffective voice mechanisms to higher turnover intentions and psychological strain.[67]

In the longer term, more cooperative employer-union relationships and reduced workplace conflict are expected to generate broader labour market benefits, including more stable industrial relations, reduced inequality, and improved health and wellbeing. Improved pay predictability and working conditions resulting from more effective collective bargaining are expected to reduce financial insecurity, which is strongly associated with wellbeing gains.[68]

However, realising these benefits will depend on employer behaviour, enforcement capacity, and wider economic conditions, all of which are assumed to be broadly enabling in the logic model but may not hold uniformly in practice. Employers may respond to strengthened worker voice not through genuine adaptation but through avoidance strategies. For example, restructuring, increased outsourcing, or greater use of agency work.[69] These could limit the representational gains the reforms intend to deliver, particularly in sectors already characterised by fragmented employment arrangements.[70]

Barriers such as fear of retaliation, low awareness of new rights, and the structural challenges facing collective organisation in gig and platform-based work settings could also constrain the reforms' reach. Equally, the success of these reforms will depend on trade unions' own capacity to organise and recruit, and their ability to seize the opportunities the ERA provides.

[67] Sheraz, A., Wajid, M., Sajid, M., Qureshi, W. H., & Rizwan, M. (2014). Antecedents of job stress and its impact on employees' job satisfaction and turnover intentions. *International Journal of Learning & Development, 4*(2), 204-226.
[68] Barth, E., Bryson, A., & Dale-Olsen, H. (2020). Union density effects on productivity and wages. *The Economic Journal, 130*(631), 1898-1936.
[69] Bertolini, A., & Dukes, R. (2021). Trade unions and platform workers in the UK: Worker representation in the shadow of the law. *Industrial Law Journal, 50*(4), 662-688.
[70] Cini, L., & Tassinari, A. (2022). Trade unions in the gig economy. *The Wiley Blackwell Encyclopedia of Social and Political Movements*. Wiley-Blackwell.

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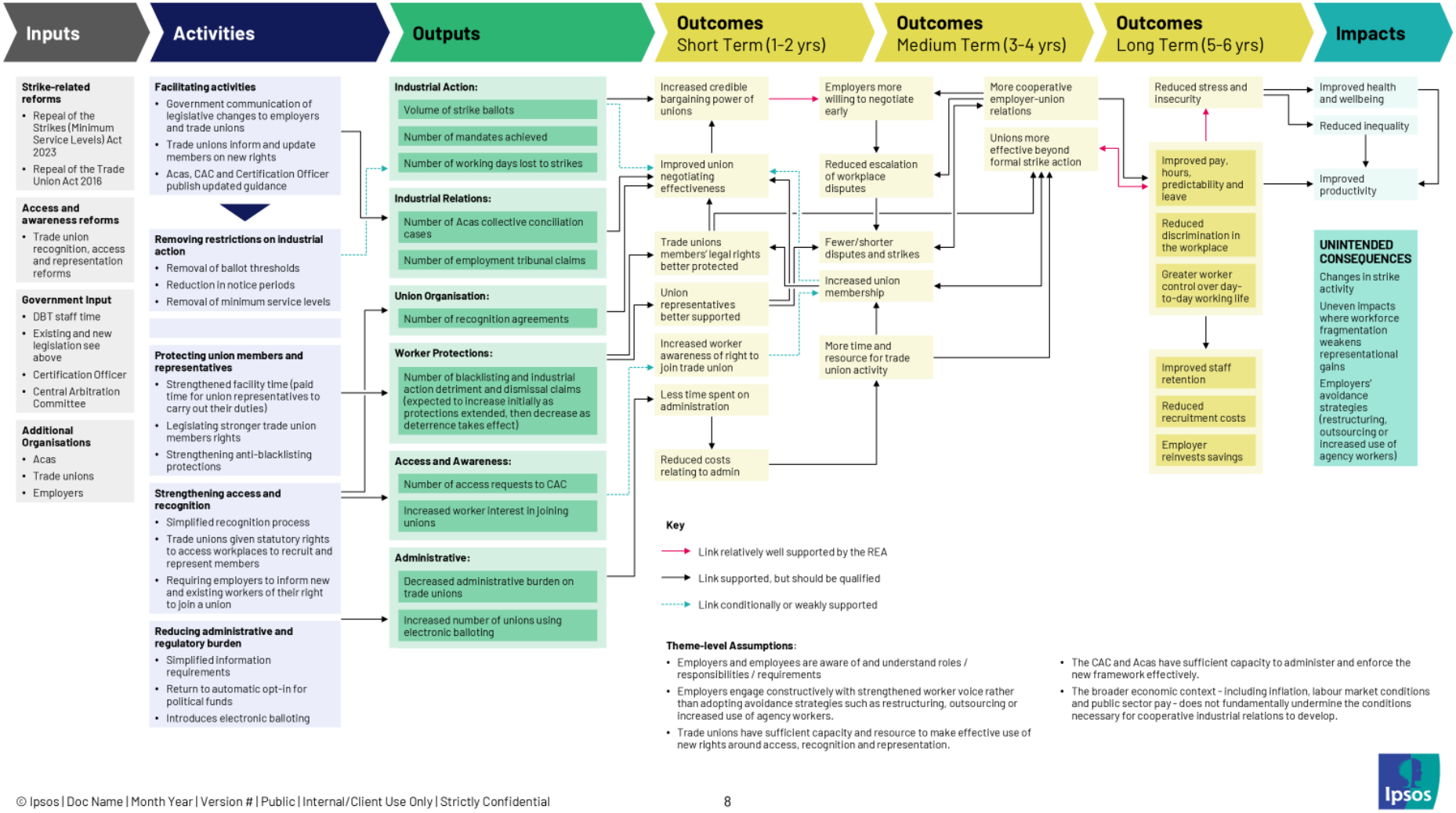
## Figure 4.4: Voice at Work




Source: Authors' elaboration, 2026

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### 4.1.5 Family Friendly Rights

The Family Friendly Rights theme brings together the following four reforms:

1. Enhanced protection against dismissal for pregnant women and mothers returning from maternity leave.

2. Statutory day-one right to unpaid bereavement leave (including pregnancy loss before 24 weeks).

3. Improvements to the flexible-working framework (introduction of a new obligatory process for consulting employees, and a requirement that refusals be "reasonable").

4. Day-one rights to paternity leave and unpaid parental leave.

Together, these changes aim to clarify entitlements[71] and provide employees with greater job security during major life events.[72] This is intended to reduce specific sources of work-related stress and discourage 'presenteeism' (i.e., working while unwell), thereby improving employer-employee relations.[73] For example, the statutory right to bereavement leave gives an employee the security to take time off to grieve, which reduces the potential for friction when asking for time off and which is expected to support their wellbeing and productivity on their return. In parallel, the reforms aim to widen access to flexible work and help employees balance work and (child) care[74] – outcomes which are associated with and expected to ultimately contribute to higher retention, improved wellbeing, a reduction in the gender pay gap as well as skills and knowledge retention.

Causal pathways for each reform are summarised below:

**Enhanced dismissal protections for pregnant women and new mothers**: These protections will strengthen dismissal protections for pregnant women and new mothers in the workplace. This measure is expected to improve retention of this group, supporting continued participation in work and retaining firm-specific skills.[75]

- **New right to unpaid bereavement leave**: The day-one right to unpaid bereavement leave provides an entitlement to take time to grieve, which is intended to improve clarity on rights around bereavement leave and reduce the pressure on employees to work while unwell (presenteeism), which can lead to stress and productivity losses. By providing job security during time off, the policy aims to support employees' wellbeing and help them return to their normal level of productivity.

[71] BEIS PIR 2014 Flexible Working (BEIS, 2021). Post-Implementation Review of the 2014 flexible working regulations (PIR No. BEIS037(PIR)-21-LM). Department for Business, Energy and Industrial Strategy.
[72] BEIS & EHRC (2016). Pregnancy and maternity: Related discrimination and disadvantage, Summary of key findings.
[73] Côté, K., Lauzier, M., & Stinglhamber, F. (2021). The relationship between presenteeism and job satisfaction: A mediated moderation model using work engagement and perceived organizational support. *European Management Journal*, 39(2), 270–278.
[74] Heshmati, A., Honkaniemi, H., & Juárez, S. P. (2023). The effect of parental leave on parents' mental health: a systematic review. *The Lancet Public Health*, *8*(1), e57–e75.
[75] Grimshaw, D., & Miozzo, M. (2021). Human capital and productivity: a call for new interdisciplinary research. (2021). The Productivity Institute. https://www.productivity.ac.uk/wp-content/uploads/2021/08/WP006-Human-capital-and-productivity-FINAL.pdf

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- **Improve access to flexible working**: By requiring a specific process for consultation and raising the bar for refusal, these reforms should increase uptake of appropriate arrangements (particularly for parents and carers), giving workers greater control over their day-to-day work and work–life balance, which enhances job satisfaction and, in turn, supports better health and wellbeing.[76] This contributes to strengthened job security and labour market attachment, as it reduces the need for employees to leave their job or move to more precarious work in order to manage family and caring responsibilities.

**Day-one rights to paternity and unpaid parental leave**: Day-one rights to paternity and unpaid parental leave simplifies eligibility for both employees and employers and is expected to raise uptake.[77] The main aim is to allow more parents, particularly fathers in new jobs, to take leave and play a greater role in caring for their children, which supports a better work-family balance. By enabling more fathers to be involved in early-stage care, the policy is intended to support a more equitable division of caring responsibilities, contributing over time to more inclusive workplaces.

The main impacts of these reforms could eventually contribute to improved organisational productivity,[78] improved health and wellbeing[79] and increased inclusivity and equality of workplaces.[80]

These pathways are not automatic and there are important risks to monitor. Importantly, the policies within the Family Friendly Rights theme rely on employees 'claiming' these rights of their own accord. This requires employees to be aware of their rights, feel confident in exercising them, and, if those rights are denied, be sufficiently confident that the effort and cost of bringing a case will be justified by the expected compensation and payment of arrears. Furthermore, employers may face increased administrative and implementation demands, with heavier human resources (HR) workloads to update policies.[81] Some may respond by adjusting recruitment practices such as lengthening the hiring process, tightening selection, or becoming more cautious about candidates being perceived as higher risk. There is also a risk that family-friendly leave and flexible working are stigmatised in some workplaces, limiting career advancement for those who use them.[82] Greater evidential requirements could lengthen and complicate Employment Tribunal (ET) proceedings during the transition, for ETs as well as employers who are likely to experience higher administrative workload to document that dismissal and flexible working request refusals are proportionate and legitimate under the new reforms. Finally, in the case of the flexible working policy, if flexibility is

[76] Haby, M., Chapman, E., Clark, R. & Galvao, L. (2016). Interventions that facilitate sustainable jobs and have a positive impact on workers' health: An overview of systematic reviews. *Revista Panamericana de Salud Pública*, 40(5), 332–340.
[77] Gregory, A., & Milner, S. (2011). "Fathers and work-life balance in France and the UK: policy and practice". *International Journal of Sociology and Social Policy*, 31(1-2), 34–52. Available at: https://doi.org/10.1108/01443331111104797
[78] Van De Voorde, K., Paauwe, J. & Van Veldhoven, M. (2012). Employee Well-being and the HRM-Organizational Performance Relationship: A Review of Quantitative Studies. *International Journal of Management Reviews*, 14(4), 391–407. Available at: https://doi.org/10.1111/j.1468-2370.2011.00322.x
[79] Agnoletto, M. (2024). Flexible working and well-being: evidence from the UK. *Journal of Demographic Economics*, 90(4), 1–37. Available at: https://doi.org/10.1017/dem.2024.16
[80] Strang, L., & Broeks, M. (2016). Maternity Leave Policies: Trade-Offs Between Labour Market Demands and Health Benefits for Children. RAND Corporation.
[81] FSB (2025). New research shows scale to which Labour's employment plan will harm jobs, lock people out of work and cause spiralling benefits bill.Fsb.org.uk.
[82] Fawcett Society (2023). *Equal Pay Day 2023: Unlocking Flexible Work*. (2023, November 22). https://www.fawcettsociety.org.uk/equal-pay-day-2023

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poorly designed or implemented, it can lead to work–life collision,[83] unpaid overtime and renewed flexibility stigma,[84] resulting in reduced progression for some groups (particularly women and part-time workers). Understanding and mitigating these potential unintended consequences should be a core focus of implementation and evaluation.

[83] ReWAGE (2023). Evidence Paper: The future of flexible working. Available at: https://orca.cardiff.ac.uk/id/eprint/162191/1/the_future_of_flexible_working_-_evidence_paper_20230830.pdf
[84] Chung, H. & van der Horst, M. (2020). Flexible working and unpaid overtime in the UK: The Role of Gender, Parental and Occupational Status: H. Chung, M. van der Horst. *Social indicators research*, *151*(2), 495-520.

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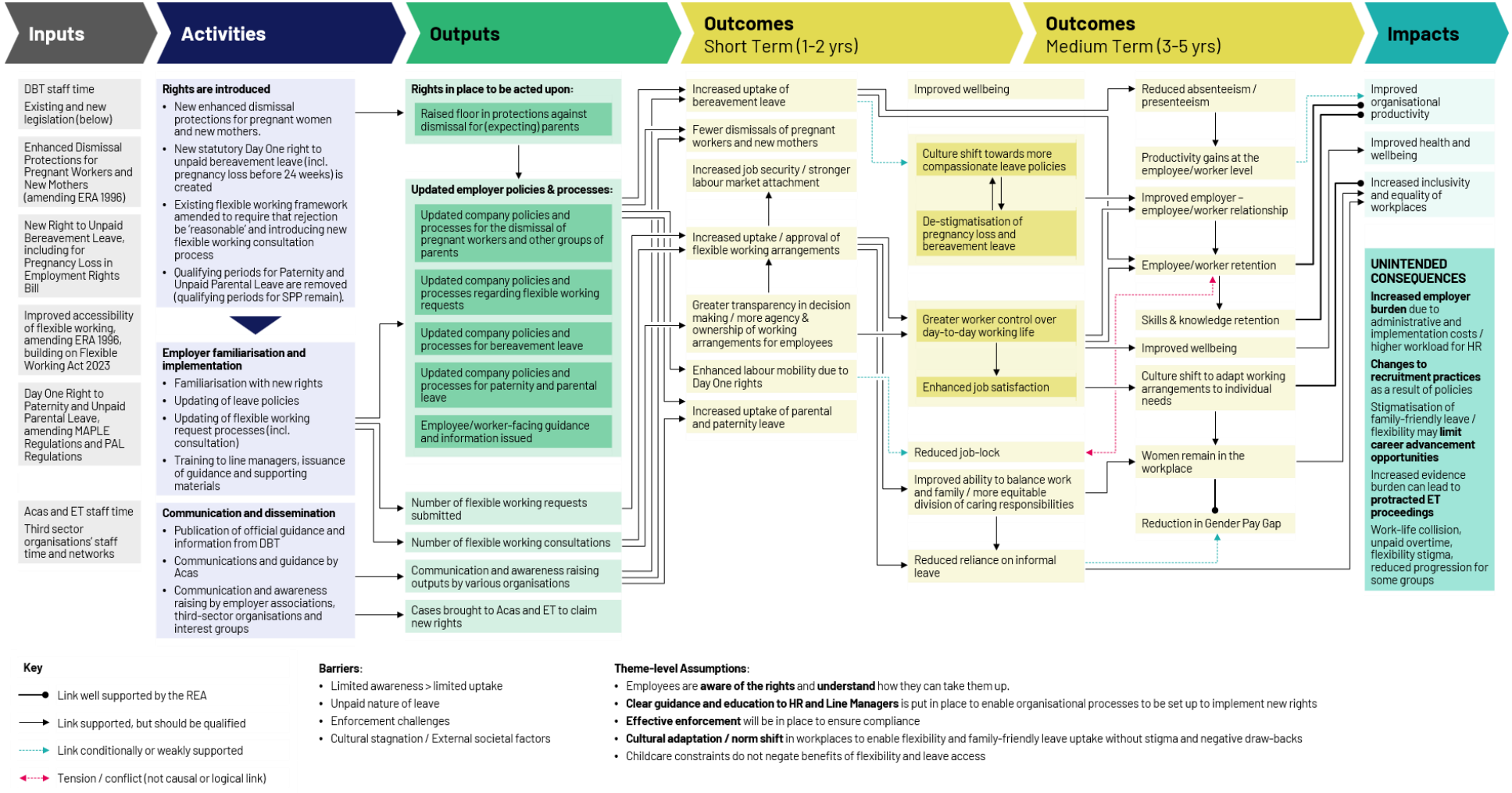
## Figure 4.5: Family Friendly Rights

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### 4.1.6 Enforcing Rights at Work

The Enforcing Rights at Work theme brings together reforms aimed at strengthening the UK's labour market enforcement system through two main channels:

1. The establishment of the Fair Work Agency (FWA), operational from April 2026, consolidates the functions of four previously separate enforcement bodies (the Gangmasters and Labour Abuse Authority (GLAA), the Employment Agency Standards Inspectorate (EAS), the Director of Labour Market Enforcement (DLME), and HMRC's National Minimum Wage team) into a single organisation.
2. The ERA 2025 standardises Employment Tribunal (ET) time limits for most claims from 3 to 6 months.

These reforms together aim to make it easier for workers to access justice, to improve compliance with employment law, and to create a more coherent and effective enforcement system. The main causal pathways in which this is expected to be achieved are as follows:

- The consolidation of enforcement functions into the FWA is expected to reduce fragmentation in the enforcement system. Evidence highlights that the UK's previously fragmented enforcement landscape (split across six or more bodies and seven government departments) contributed to very low worker awareness.[85] By bringing these functions together, the reforms aim to improve intelligence-sharing, enable more effective risk-based targeting of non-compliant employers, and generate efficiency gains over time. The FWA also creates a single, accessible point of contact for workers and employers, lowering awareness barriers and facilitating engagement. Furthermore, the FWA has a statutory obligation to assess the scale and nature of labour market non-compliance across different sectors and employment types. This function will enhance the evidence base needed for effective risk-based targeting, enabling the FWA to direct enforcement resources where non-compliance is most prevalent and harmful.

- Alongside consolidation, over time the FWA will extend its remit to additional rights, starting with holiday pay, and ERA gives the FWA additional powers, such as powers to recover the cost of enforcement activity from non-compliant employers. This expanded remit (combined with the efficiency gains highlighted above) is expected to increase enforcement activity and its effectiveness, recover more arrears for workers, and strengthen the deterrent effect of the enforcement system. Existing research highlights however that the deterrent effect of enforcement depends critically on penalty levels and detection probability[86] – the extent to which the expanded remit translates into effective deterrence will therefore depend on implementation choices around penalty levels and enforcement levels.

- The extension of ETs time limits is expected create more opportunity for workplace resolution before cases reach tribunal and to improve access to justice by giving workers

[85] Davies, R., Hamdan, N., & Thwaites, G. (2023). Ready for change: How and why to make the UK economy more dynamic. Resolution Foundation.
[86] Davies et al. (2023); Low Pay Commission (2019). Non-compliance and enforcement of the National Minimum Wage. Low Pay Commission.

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more time to bring claims, reducing rushed or poorly prepared claims. Some government research[87] [88] found that short time limits deterred claims, with workers reporting insufficient time to find out about tribunals / the details of the enforcement system, or that the time was insufficient to exhaust internal grievance processes first. However, it is worth highlighting that this evidence relates primarily to sexual harassment and discrimination claims.

In the short term, the reforms are expected to produce a less fragmented enforcement system, improved awareness of the FWA among employers and workers (supported by awareness raising and promotional activities), and increased and better-targeted enforcement activity informed by the FWA's systematic assessment of non-compliance patterns.[89] As the FWA becomes fully operational and awareness grows, employers are expected to perceive a higher risk of compliance interventions and enforcement action, which evidence suggests can encourage self-correction and improved compliance even before formal action is taken. The extended ETs time limits are expected to increase the volume of claims marginally, but will also improve the quality of claims as workers have more time to gather evidence, seek advice, and attempt internal resolution.

In the medium term, as the system beds in and enforcement capacity increases, the reforms are expected to deliver improved efficiency, stronger deterrence, and greater financial security for workers through recovered arrears and enforced awards. For businesses, a more coherent, consistent and therefore predictable enforcement system is expected to support fairer competition by reducing the advantage gained by non-compliant employers who undercut those following the rules.[90] In the longer term, the combined effect of these reforms is expected to contribute to broader economic and social objectives. By improving access to justice, deterring non-compliance, and supporting fairer treatment at work, the reforms aim to reduce workplace conflict, improve worker wellbeing, and support greater inclusivity and participation in the labour market.

Critically, the extent to which these outcomes are realised will depend on successful implementation, adequate resourcing, and the time required for the new system to become fully effective. Resourcing in particular is a significant constraint, not just for the nascent FWA, but also the wider enforcement and justice system, particularly Acas and Employment Tribunals (ET). The Dispute Resolution system is currently under severe strain, with substantial ET backlogs meaning that workers who bring ET claims may wait several years before their case is heard, undermining confidence in the system and potentially limiting the practical benefits of extended time limits and improved rights. More widely, we are working across government to make the Dispute resolution System more efficient and resilient, so that that the system is fit for the current landscape of employment rights and equipped to respond to future changes.

[87] EHRC (2018). Turning the tables: Ending sexual harassment at work.
[88] House of Commons Women and Equalities Committee (2018). Sexual harassment in the workplace (Fifth Report of Session 2017-19, HC 725). UK Parliament.
[89] Welch, L. (2024). The Employment Rights Bill – A welcome change, but there's room for more. Socialist Lawyer, No. 96, 6-8.
[90] Cominetti, N. (2023). Who cares? The experience of social care workers, and the enforcement of employment rights in the sector. Resolution Foundation; Low Pay Commission (2019). Non-compliance and enforcement of the National Minimum Wage. Low Pay Commission.

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Furthermore, the reforms to the enforcement system could result in some potential negative side-effects:

- There is a risk that increased enforcement activity lead to higher costs for compliant employers and greater pressure on SMEs, particularly in sectors subject to risk-based targeting.
- Employers may respond by increasing use of casual or agency work to avoid obligations, or by becoming more cautious in hiring, which would work against the expected systems-wide economic benefits.
- Workers in vulnerable groups (migrant workers, those with language barriers, or those digitally excluded) may continue to face barriers to accessing the system, especially if a digital-first approach is taken, limiting the reach of the reforms.

On the extension of ET time limits:

- It is estimated that the impact on employment tribunals as a result of extending time limits could be a marginal increase in claims annually.

Overall, it should be noted that the evidence base for this theme is weaker than for other MWP reforms. While there is strong evidence on the economic costs of non-compliance and the barriers workers face in accessing enforcement, there is limited direct evidence on the effects of enforcement body consolidation, as no comparable reform has been evaluated and published in the UK or internationally. Similarly, the links between improved enforcement and longer-term outcomes such as productivity, economic growth, and worker wellbeing are largely indirect. However, the FWA's statutory assessment function provides a mechanism to build this evidence base over time, enabling systematic tracking of non-compliance trends and the effectiveness of consolidated enforcement.

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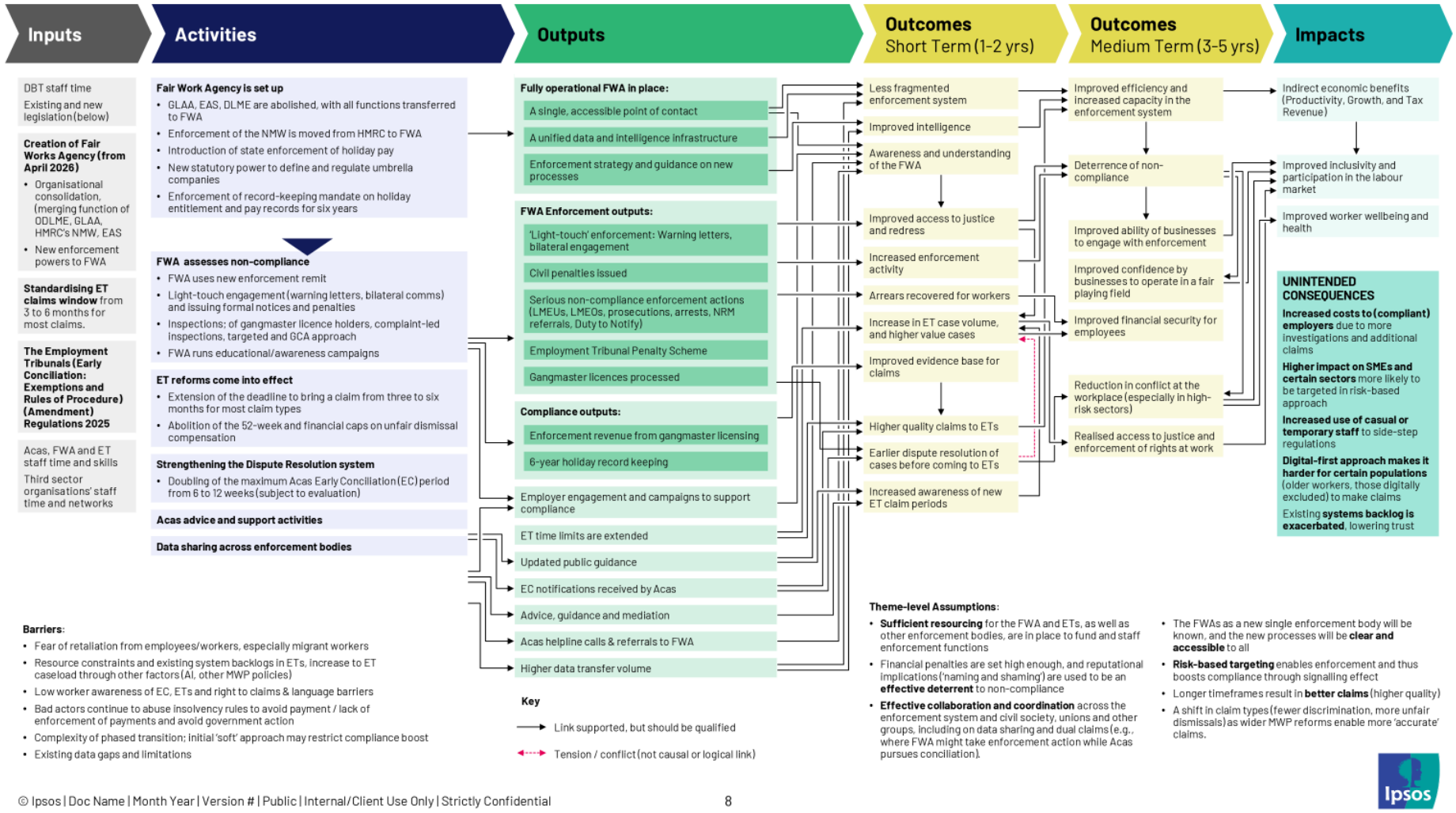
## Figure 4.6: Enforcing Rights at Work




Source: Authors' elaboration, 2026

## 4.2 Systems mapping

The MWP reforms synergistically build on and complement each other to achieve the overarching objectives of the programme:

1. modernise the workplace;
2. raise living standards;
3. tackle low pay;
4. address poor working conditions;
5. improve job security;
6. help more people to stay in work.[91]

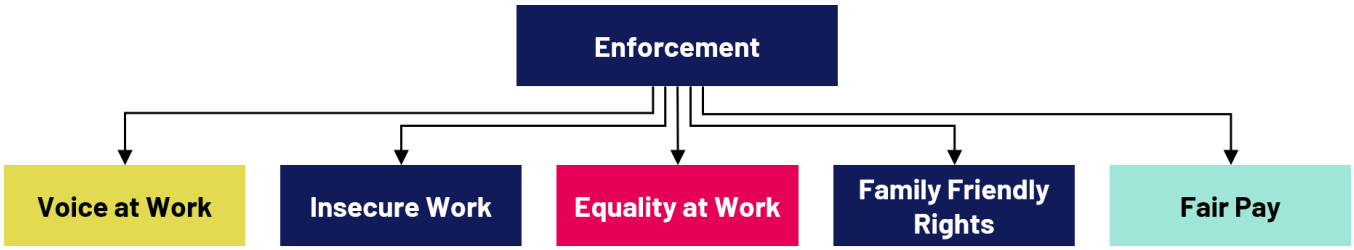
It is critical for the evaluation to understand how reforms across the themes interact with each other, which sectors and groups are most affected, and when different outcomes materialise in order to adopt an evaluation approach that can capture both theme-specific outcomes and cross-cutting programme-level effects. See Section 5 for questions the evaluation will look to answer.

### 4.2.1 Links between themes

In addition to contributing to the same overarching objectives, four key linkages across the MWP themes were identified. These interlinkages mean that the evaluation cannot treat themes in isolation but must explicitly track and assess their interactions and capture both direct effects of individual themes and indirect effects mediated through other reforms.

**Enforcement as a critical enabler across MWP:** Enforcement is a critical enabler across all policies falling within scope of the MWP programme. Without effective enforcement mechanisms through the FWA, ETs and other bodies, the intended benefits of reforms cannot be fully realised as reliance on voluntary compliance is unlikely to be sufficient. This extends not only to effective enforcement action being taken, but also an initial awareness of both enforcement bodies and pathways and the underlying rights workers can claim against. While the FWA will be able to bring claims on behalf of workers, there remains large reliance on employees bringing claims on their own behalf to ensure rights are respected and non-compliance results in consequences.

**Figure 4.7: Enforcement as a critical enabler**




Source: Authors' elaboration, 2026

Enforcement mechanisms differ across the MWP themes. For example, enforcement of policies within the Voice at Work theme (reforms amending industrial relations and union processes and

[91] Labour Party (2024). Labour's Plan to Make Work Pay. Available at: https://labour.org.uk/wp-content/uploads/2024/06/MakeWorkPay.pdf

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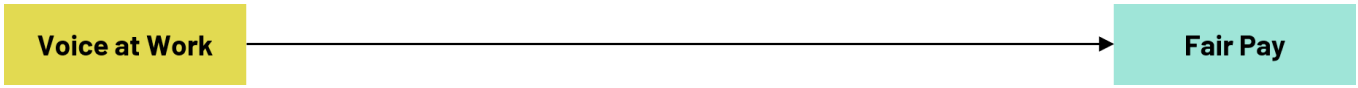
powers) will not fall within the remit of the FWA, unlike most other policies in scope (although the FWA will assume new enforcement powers gradually over the next two years only). This reinforces that the entire enforcement system (rather than just the FWA as a new body introduced through the MWP programme) is critical in underpinning effective implementation of MWP policies overall and subject to key implementation dependencies (institutional capacity is of particular concern, including potential constraints at Acas and the FWA, and long-term, systemic backlogs at ET).[92]

**Collective power as an enabler to Fair Pay outcomes:** The reforms within the Voice at Work theme will directly contribute to enable outcomes within the Fair Pay theme. The Voice at Work reforms will enhance collective bargaining power, which – when effectively exercised through union representation and negotiation – is expected to lead to decisions that improve pay outcomes for workers, thereby contributing to the Fair Pay objectives.

**Figure 4.8: Collective power enables Fair Pay**




Source: Authors' elaboration, 2026

An important caveat to note is that this link is constrained to those sectors where unionisation is prevalent (such as the public sector, transport and education).[93] Other sectors, such as hospitality and retail however, with higher shares of insecure, temporary and transient workers are historically much less unionised,[94] although these sectors are the ones where policies under the Fair Pay theme are expected to achieve the biggest impact.[95]

**Strategic tension between security and mobility:** A potential tension was identified between two expected outcomes of the MWP programme, especially of the Insecure Work and Fair Pay theme. On the one hand, at the individual level increased job security and stability could reduce labour mobility and thus hamper progression from low pay, as individuals will feel more content and comfortable in their current job, reducing their incentive to change and seek improvements. However, at a wider societal level, this relationship would run in the opposite direction *if* these outcomes (security and stability) are prevalent across the labour market, as it emboldens employees to leave secure, stable and fair work due to knowing that these conditions will be present in their next job as well.[96] Therefore, direction of this link may change over time as reforms and outcomes become embedded across the system.

[92] Davies, R., Hamdan, N., & Thwaites, G. (2023). Ready for change: How and why to make the UK economy more dynamic. Resolution Foundation. September 2023, Cominetti, N., & McCurdy, C. (2025). Low Pay Britain 2025: Where next for the Government's employment reforms? Resolution Foundation, July 2025.
[93] DBT (2025). Trade union membership, UK, 1995 to 2024: statistical bulletin.
[94] Bertolini, A., & Dukes, R. (2021). Trade unions and platform workers in the UK: Worker representation in the shadow of the law. *Industrial Law Journal*, 50(4), 662-688.
[95] UK Government (2026). Employment Rights Act 2025: Economic Analysis, DBT. Available at: Employment Rights Act 2025: economic analysis
[96] Judge, T. A., Piccolo, R. F., Podsakoff, N. P., Shaw, J. C., & Rich, B. L. (2010). The relationship between pay and job satisfaction: A meta-analysis of the literature. *Journal of Vocational Behavior*, 77(2), 157-167, Gruber, J., & Madrian, B. C. (1994). Health Insurance and Job Mobility: The Effects of Public Policy on Job-Lock. *Industrial and Labor Relations Review*, 48(1), 86.

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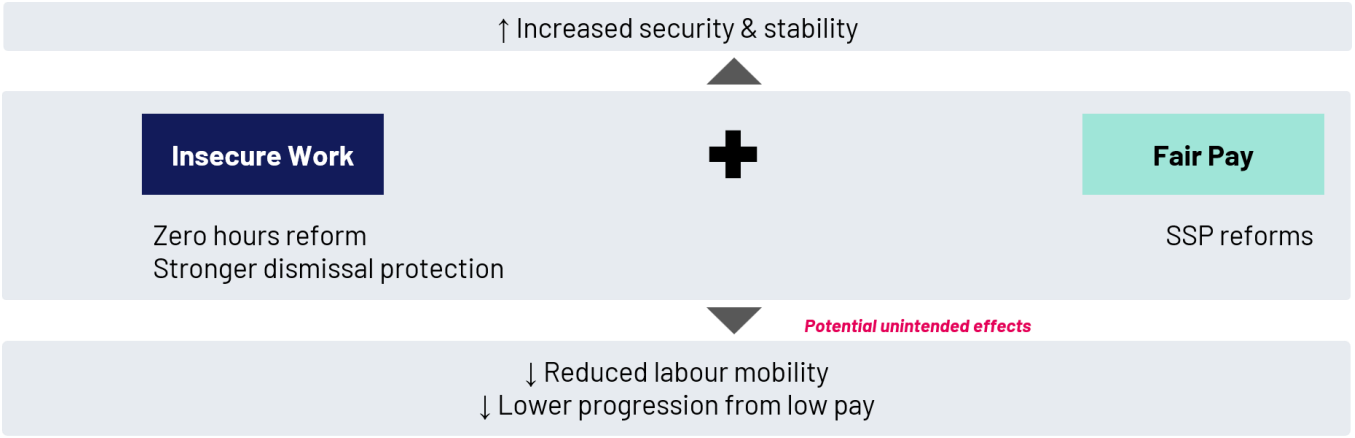
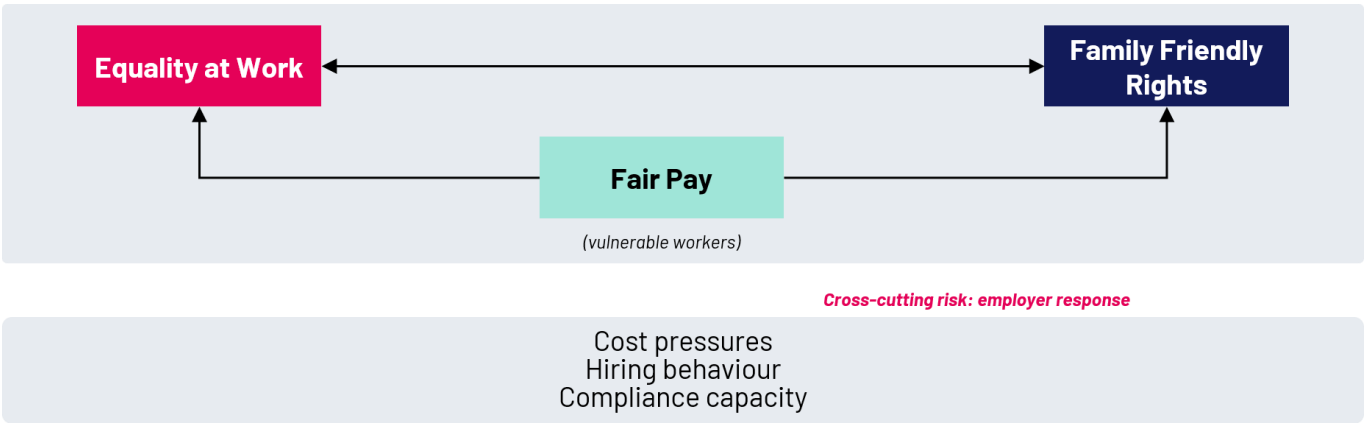
**Figure 4.9: Tension between security and mobility**




Source: Authors' elaboration, 2026

**Potential tension between worker-friendly policies and risk of reduced employment:** Policies within the Equality at Work and Family Friendly Rights themes – while benefitting all workers – are specifically targeting certain sub-groups, such as women and parents. However, such worker-friendly business practices result in higher costs to employers, including familiarisation costs and ongoing higher administrative burden to implement such policies.[97] This may cause tension to the overall objective of improved growth and increased labour participation, as employers may become more hesitant to hire generally, or adapt their hiring practices to avoid certain groups more likely to make use of the new policies introduced. Specifically, this could counteract the expected benefits from the policies within the Fair Pay theme, which seek to improve outcomes for vulnerable workers; many categories of which (sectors, demographics) especially fall into scope of the Equality at Work and Family Friendly Rights theme.

**Figure 4.10: Reinforcing focus on vulnerable groups heightens risks of employers' response**




Source: Authors' elaboration, 2026

A programme-level evaluation should explore these interactions, and any others that may be identified, to understand if they operate as expected. However, the focus should be on **how**

[97] DBT (2024). Making flexible working the default (Final stage impact assessment No. DBT-041-24-CMRR); DBT (2024). Protections against dismissal for pregnant workers (Final stage impact assessment No. DBT-040-24-CMRR); DBT (2025). Employment Rights Act 2025: Economic Analysis - Enactment Summary Impact Assessment. DBT-024-24-CMRR; CIPD (2025). The (unintended) consequences of the employment rights bill.

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**enforcement underpins the progress to outcomes and impacts across the programme**, given this is key to every theme, reform and type of worker (see Section 6.1 and 6.2 below).

### 4.2.2 Sectoral variations

Most reforms in the MWP programme (including the extension of unfair dismissal protections, zero hours and similar contracts reforms, changes to the SSP, and strengthened trade union rights) apply across the economy, indiscriminate of sectors. Some reforms however target specific sectors – most notably, the Fair Pay theme includes sector-specific Fair Pay Agreements in adult social care, establishing a mechanism for negotiating minimum pay and employment conditions across the sector through the dedicated Social Care Negotiating Bodies. Additionally, several economy-wide reforms are in fact expected to benefit particular sub-groups of employees more, as the underlying issues these policies address are especially present amongst certain sectors.

The economic analysis of the ERA 2025 identifies certain sectors as certain to be impacted more than average by 'large impact' policies (e.g., the right to guaranteed hours, changes to SSP, changes to unfair dismissal).[98] These are **hospitality**, **health and social work**. The education, transport and storage, wholesale and retail and the arts, entertainment and recreation sectors were also expected to be impacted more than average.

This sectoral variation in impacts reflects wider evidence from academic literature, which identified in particular the social care, hospitality and retail sectors as those most likely to experience the most significant and compounded impacts from the MWP reform. These sectors are characterised by high concentrations of the very employment practices the reforms seek to address: hospitality and retail as sectors where zero hours contracts and variable hours arrangements are most prevalent[99]; workers in hospitality and retail face high exposure to third-party harassment[100]; all three are characterised by weak unionisation rates due to fragmented employment arrangements prevalent in these sectors[101]; and all three are considered to be low-paid sectors[102] where reforms under the Fair Pay theme are expected to deliver the greatest impacts.[103] Critically, these same sectors also face the highest risks of non-compliance and enforcement challenges[104], demonstrating higher levels of prevalence of conflict and are priority sectors for risk-based enforcement targeting.[105]

Furthermore, significant variations are expected in how MWP reforms will affect businesses of different sizes, with SMEs facing challenges related to awareness and capacity to implement compliance, while also disproportionately impacted by costs related to familiarisation and ongoing

[98] See section 16b here: Employment Rights Act 2025: economic analysis
[99] Navani, A., & Florisson, R. (2024). No progress? Tackling long-term insecure work.
[100] Pillinger, J. (2022). The role of social partners in preventing third-party violence and harassment at work.
[101] Bertolini, A., & Dukes, R. (2021). Trade unions and platform workers in the UK: Worker representation in the shadow of the law. *Industrial Law Journal*, 50(4), 662–688
[102] National Minimum Wage: Low Pay Commission Report (2025); Cominetti, N., & McCurdy, C. (2025). Low Pay Britain 2025: Where next for the Government's employment reforms? Resolution Foundation, July 2025.
[103] UK Government (2026). Employment Rights Act 2025: Economic Analysis, DBT. Available at: Employment Rights Act 2025: economic analysis
[104] Cominetti, N. (2023). Who cares? The experience of social care workers, and the enforcement of employment rights in the sector. Resolution Foundation; Low Pay Commission (2019). Non-compliance and enforcement of the National Minimum Wage. Low Pay Commission.
[105] Davies, R., Hamdan, N., & Thwaites, G. (2023). Ready for change: How and why to make the UK economy more dynamic. Resolution Foundation. September 2023.

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administrative burden.[106] Business size make-up amongst sectors therefore also needs to be considered in any future evaluation.

A programme-level evaluation should critically reflect on these sectoral differences and compounding impacts, not only ensuring that data collection provides sufficient disaggregated evidence of sectoral outcomes and barriers, but also to accurately portray outcomes and contribution thereof to the MWP programme.

### 4.2.3 Timing variations

Reforms within the MWP programme are implemented through a phased approach, from December 2025 through to at least 2028. This staggered implementation reflects both practical considerations and the varying nature of the reforms themselves, as some policies constitute structural, transformative changes which require significant lead-in time not only for policy design and amendments to related legislation, but also for employers to enable adequate preparation.

Phased implementation, as well as differences in how long certain causal pathways take to enact change means that considerable variation is also expected in when outcomes are likely to materialise across the themes. For example, enforcement mechanisms (with the FWA established in April 2026) are expected to see a change imminently and separately, immediate effects are expected on both employers and employees from e.g., improved SSP access. On the other hand, outcomes from reforms in the Equality at Work and Voice at Work themes are expected to take longer, as they are contingent on cultural and behavioural shifts that may take years to embed.

An additional temporal consideration is that some outcomes may move in different directions in the short-term compared to the medium-term while processes and changes become embedded. For example, enforcement actions and claims to ETs are expected to increase initially as a result of a strengthened enforcement system and rights that can be enforced. In the longer-term, however, high compliance is expected to reduce the need for enforcement in the first place.

An evaluation of the MWP programme therefore needs to account for the temporal sequencing by taking a phased approach acknowledging different outcome timelines while avoiding premature conclusions about programme effectiveness. Critically, the overlapping implementation periods and varying outcome timelines create attribution challenges, and the evaluation should be designed with sufficient duration and flexibility to capture immediate adjustments and longer-term systemic changes, while maintaining the ability to adapt as different elements of MWP come into effect, potentially accompanied by different other policy measures. Finally, in instances where reforms across themes are dependent, or reinforced by each other, the evaluation needs to clearly account for this when assessing outcomes and impacts.

Rather than constituting a standalone evaluation method, systems mapping should be viewed as a cross-cutting analytical approach that supports the process, impact and economic evaluation. It provides a structured way of understanding how reforms interact, identifying dependencies

[106] UK Government (2026). Employment Rights Act 2025: Economic Analysis, DBT. Available at: Employment Rights Act 2025: economic analysis

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between themes, and interpreting programme-level outcomes within the wider labour market system. Throughout the evaluation, systems mapping should therefore be used iteratively to refine the programme theory, interpret emerging evidence, and identify interactions and unintended consequences that would not be apparent when evaluating individual reforms in isolation.

## 4.3 Programme-level Theory of Change (ToC)

MWP reforms span the six interconnected themes that collectively seek to address the longstanding challenges and create a labour market that is fairer, more secure, and more productive. The MWP reforms are being introduced into a labour market characterised by persistent labour market dualism, high levels of insecure work, sectoral workforce shortages, pressure on enforcement institutions, and wider economic pressures affecting employers. These conditions shape both the rationale for reform and the extent to which intended outcomes can be achieved. As a result, the reforms are expected to operate differently across sectors, workforce groups and employer types, and their impacts will be influenced by wider economic and labour market trends.

The reforms are implemented through a range of activities including legislative change, new guidance, updated Codes of Practice, enhanced enforcement arrangements, communication with key labour market stakeholders such as Acas, ETs, and other regulatory bodies, and the creation of new supporting bodies including the FWA and the Adult Social Care Negotiating Body. Although the MWP reforms operate through a range of different policy mechanisms, the programme is expected to generate change through several causal pathways summarised below.

Although Enforcing Rights at Work is presented as a separate theme within the MWP programme, it also functions as a cross-cutting enabling condition for the successful delivery of all reforms. Across each theme, the achievement of intended outcomes depends not only on the introduction of new rights but also on employers understanding and complying with those rights, workers being aware of available routes to redress, and enforcement institutions having sufficient capacity to promote compliance and resolve disputes. For this reason, the evaluation should monitor the performance of the enforcement system – including the FWA, ET system, Acas and worker awareness of enforcement and redress routes – as an early indicator of whether the wider programme is likely to achieve its intended outcomes.

Across all themes, the reforms rely on a common implementation pathway. Government, regulators, Acas, tribunals and other delivery bodies communicate and operationalise the reforms, while employers update policies and procedures and employees become aware of their rights. The extent to which employers comply, and employees exercise those rights is a critical determinant of whether downstream outcomes materialise.

### 4.3.1 Contracts and conditions, including pay

Initially, reforms aimed at strengthening employment protections and minimum standards (such as changes to the SSP, zero hours and similar contracts reforms, fire and rehire practices) are expected to increase job security, improve income predictability, and strengthen workers'

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employment rights. These changes should reduce exposure to low-paid and insecure work, which is disproportionately represented in sectors such as hospitality and retail where these employment practices are most prevalent, and amongst younger workers.[107] These changes are in turn expected to lead to improved employee health and wellbeing.

Furthermore, workers will also be protected through reforms that do not immediately affect their contracts or pay but do alter their employment environment over medium- to long-term (for example, sexual harassment prevention, parental leave, flexible working). As a result, workers, particularly women and parents/carers who may otherwise limit their career progression in search of more favourable working conditions, are likely to be able to advance their careers without facing these barriers.

Reduced insecure work should also contribute to improved job stability and greater job mobility, which are in tension, and the direction of the relationship may change as reforms embed across the labour market. Over the longer term, the expected effect is increased retention within the labour market rather than within specific roles, supporting improved financial security and living standards.

All of the above contributes to reduced labour market dualism, improved job quality and better working conditions. Given the targeting of these reforms on workers which tend to be more vulnerable, this may contribute to reduced in-work poverty and narrowed inequality.

### 4.3.2 Compliance and expectations

As compliance is expected to increase, employer processes and practices will need to be updated to ensure that these are aligned, or can be aligned, with the new standards the reforms require. Alignment with reforms, particularly those under the Equality at Work (sexual harassment and menopause and gender-oriented action plans), Family Friendly Rights (bereavement and parental leave and flexible working) and Fair Pay (SSP, social care) themes, should also signal reduced stigma as employers take action to implement these reforms and communicate them to employees. Communication from Government and stakeholders is also expected to reduce taboo around these subjects. As these topics become more normalised, reforms are embedded into company practices and stigma is reduced, there should be fewer incidences of bullying, discrimination or harassment, improving employee health and wellbeing, retention and job quality and working conditions.

From these conversations and seeing employers make changes to practices, employees and workers are likely to have greater expectations of their employers once the reforms are implemented, which could create a sense of pressure and further reinforce employers' actions. This in turn could increase employees' confidence in their employers being compliant and making meaningful changes.

As employees and workers become more aware of their rights and more willing to challenge non-compliance, claims to Acas and ETs are likely to increase initially. This rise may be sustained in the

[107] Florisson, R. (2022). The UK Insecure Work Index: Two Decades of Insecurity. Work Foundation, Lancaster University.

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short to medium term due to existing tribunal backlogs and the introduction of new rights. Achieving the aims of MWP will require sufficient enforcement capacity to ensure that breaches are addressed effectively and consistently.

### 4.3.3 Collective voice

The Voice at Work reforms are intended to strengthen the ability of trade unions to recruit, represent and negotiate on behalf of workers. Simplified recognition processes, improved access rights and stronger protections for union representatives are expected to increase union membership and collective bargaining coverage over time. This should strengthen workers' collective voice and increase their ability to influence decisions affecting working conditions (including pay) and workplace practices.

As workers become more aware of their rights and have greater access to representation, employers may face increased scrutiny of employment practices and stronger expectations regarding workplace standards. In the short term, this may contribute to increased reporting of workplace issues and greater use of dispute resolution mechanisms. However, stronger collective bargaining and more constructive employer–union engagement may also enable problems to be addressed earlier, reducing the escalation of disputes and supporting more cooperative industrial relations.

Over time, stronger worker representation is expected to contribute to improvements in working conditions (including pay and job security), reinforcing the pathways associated with Fair Pay, Insecure Work and Equality at Work. These changes should help reduce insecurity at work, improve employee retention and job satisfaction, and strengthen perceptions of fairness and trust within workplaces. Collectively, this is expected to support higher employment standards, more stable employment relationships and improved workplace relations across the labour market.

### 4.3.4 Mechanisms to impact, unintended consequences and attribution

While individual reforms operate through different mechanisms, the MWP programme is expected to generate cumulative effects. Improvements in worker voice, enforcement, fairness, job security and workplace standards reinforce one another, increasing the likelihood that changes are sustained over time and embedded across the labour market.

However, the above causal pathways hinge on employers understanding how to implement policies effectively, having the capacity and capability to do so and being compliant. This may be a challenge for SMEs who have more limited capacity. It is also reliant on employees understanding what their new rights are and how they can be used. If these do not hold, the causal chain ceases to exist. Furthermore, the success of MWP is dependent on enforcement capacity. If companies are not compliant, and there are limited enforcement or concerns with enforcement capacity, non-compliance will continue. As mentioned already, the existing backlog of cases in tribunals and Acas may be compounded by new rights and thus sustained.

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Employers may also find strategies to avoid having to implement reforms. They may adopt other business models that create alternative forms of insecure work including agency work, short fixed term contracts, offshoring or other models where the individual is one-step removed, meaning their employment rights are different. In SMEs where capacity is a constraint, they may also rely on technology instead of labour, reduce hiring practices or reduce hours, which will cut the skills and development pathway short. Furthermore, the pattern of inequality may shift with some workers benefitting from improved pay and conditions and others, that are perceived by employers to be potentially more risky or less productive, facing increased barriers to employment. It is also expected that different sectors, types of employers, employees and regions may experience differing impacts stemming from differences in coverage / exposure to statutory minima and baseline terms and conditions.

As more workers remain in good-quality employment and employee wellbeing improves, labour market participation is expected to strengthen. As a result of more people remaining in work and working in stable jobs there may be some improvements on productivity and economic growth. Whilst this causal chain is logical, the levels of attribution may be a central challenge given the number of existing factors that impact these impacts.

Productivity is likely to be an impact from many of the other impacts listed, though this could be both positive (from improved labour market participation, incentives for employers to invest in staff, effective workforce management, wellbeing and security) or negative (from alternative business strategies, reduced hiring, increased administration and a shift in inequality patterns). If positive this would then contribute to economic growth.

Many of the programme-level impacts, particularly productivity, economic growth, labour market participation and inequality, are influenced by a wide range of economic, demographic and policy factors outside MWP. Consequently, evaluation is likely to focus on assessing the programme's contribution to observed changes rather than attributing impacts solely to the reforms.

The ToC model below (Figure 4.11) is a substantial simplification and does not capture all of the specific connections within the MWP programme. A more detailed programme-level ToC is provided in Appendix 4. This version reflects the links and interactions between activities, outputs and outcomes identified through stakeholder consultations. While these additional connections improve the accuracy of the model, they also increase its complexity. There is an inherent trade-off between fully reflecting the complexity of the MWP programme and maintaining a ToC that is accessible, interpretable and practical for evaluation purposes. As further links and pathways are added, it becomes increasingly difficult to distinguish the core causal mechanisms and principal pathways that the evaluation is intended to test. For this reason, it may be preferable to retain a relatively high-level ToC (as presented in Figure 4.11) and supplement it with the theme-level models discussed earlier in the report. This approach would preserve clarity while still capturing the programme's complexity where it is most relevant.

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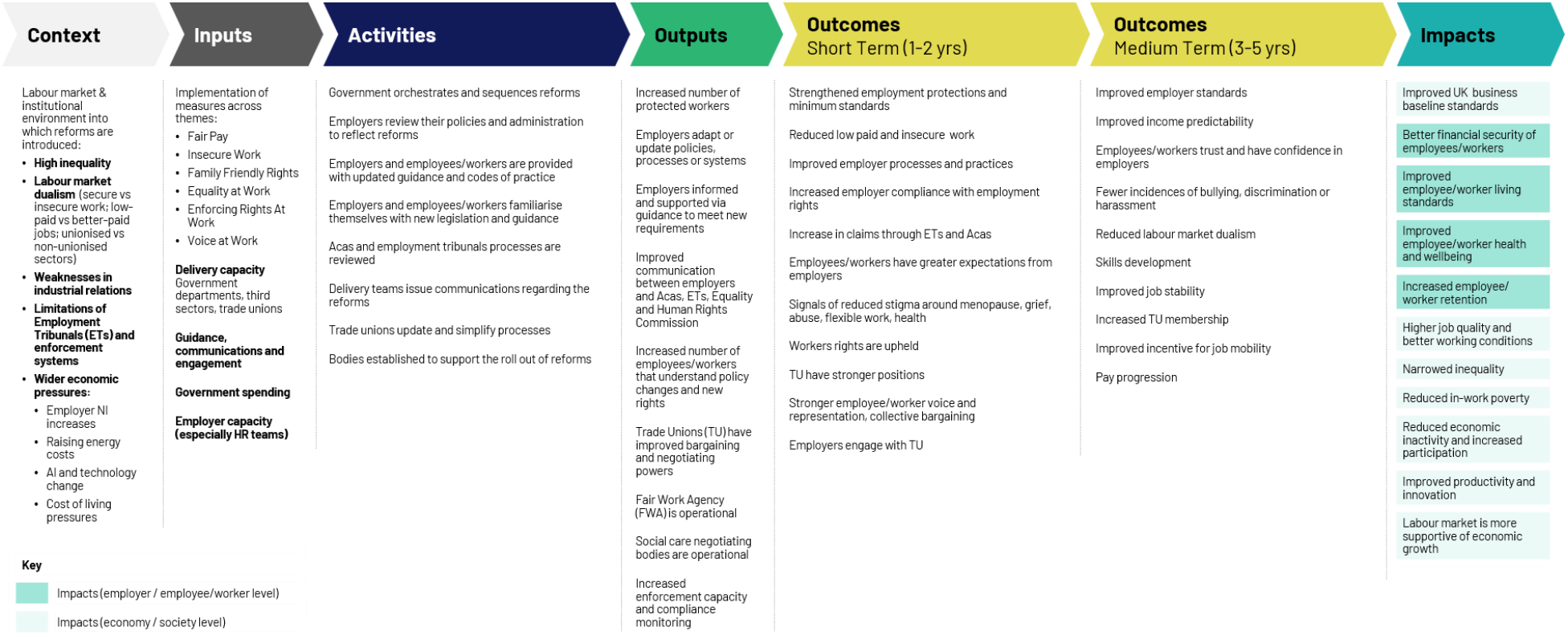
## Figure 4.11: Programme-level ToC




**Assumptions**:
- Employers have capacity to adapt
- Employers comply with new standards and obligations
- Workers feel able to exercise their rights
- Legislation and policy remains politically supported;
the legislation is implemented consistently

**Barriers**:
- Limited awareness leads to limited uptake
- Enforcement challenges mean employers do not implement changes as they are not held to account

**Employer adaptation and Unintended consequences**:
- Increased costs may lead to job losses or reduced hiring in some sectors;
- Some employers may reduce hours or circumvent responsibilities leading to legal (moving to self-employment) and illegal (non-compliance) solutions;
- Increased administrative burden for small and medium businesses;
- Disparities in implementation and outcomes between sectors and employer type;
- Businesses may adopt alternative business models that create other forms of insecure work;
- Regional disparities in implementation and outcomes;
- Employer resistance to reforms;
- Potential widening of differences between sectors if benefits were to mainly occur in already unionised workplaces;
- Costs are transferred to workers through wages or T&Cs and reduced labour market dynamism (slower hiring/reallocation);
- Risks may be higher for certain sectors or weaker labour markets

Source: Authors' elaboration, 2026

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# 5 Evaluation Questions and Methods

Consistent with the Magenta Book,[108] the proposed evaluation framework is structured around three complementary strands of evaluation: process, impact and value for money (VfM). Taken together, these strands are intended to assess whether the MWP programme was delivered as intended, whether it contributed to the outcomes and impacts anticipated in the programme ToC, and how effectively and efficiently resources were used to achieve those outcomes. The following sections set out the core process, impact and VfM questions, alongside the proposed methodological approaches for addressing each area of enquiry.

## 5.1 Evaluation overview

Table 5.1 summarises the proposed process, impact and VfM evaluation strands at the MWP programme level. It outlines the evaluation focus, the primary methodological approaches, the main sources of evidence, and the proposed timing for each strand, all of which are discussed in more detail later in this chapter. Detailed descriptions of the individual evaluation strands are provided in Sections 5.2-5.4, while methodological limitations and proposed mitigations are discussed in Section 5.5. A comprehensive evaluation question matrix is presented in Appendix 5.

**Table 5.1: Overview of the proposed MWP programme-level evaluation approach**

| Strand | Evaluation focus | Primary approach | Main evidence | Timing |
|---|---|---|---|---|
| **Process evaluation** | Understanding implementation, delivery, awareness and behavioural change | Mixed methods (document review, surveys, interviews, case studies) | Monitoring data, implementation evidence, employer & worker surveys, qualitative research | **Phase 1** |
| **Impact evaluation** | Assessing programme contribution to intended outcomes and impacts | **Contribution analysis** supported by mixed methods | Administrative data, surveys, policy-level evaluations, qualitative evidence | **Phase 2–3** |
| **Value for Money** | Assessing whether resources have been used well and delivered value | **4Es framework** informed by process and impact evidence | Cost data, monitoring information, process and impact findings | **Phase 3** |

Source: Authors' elaboration, 2026
Note: More information on the phased evaluation timeline can be found in Chapter 6.

## 5.2 Process evaluation

Conducting the process evaluation at an early stage is important for a programme-level suite of reforms such as MWP. In addition to assessing implementation progress, the process evaluation should identify and monitor emerging unintended consequences. This will enable timely course correction for HMG before implementation practices become embedded, supports refinement of the sequencing and design of later reforms, and provides an early benchmark of implementation quality across delivery contexts. Early insights into how the different reforms interact in practice will help HMG ensure coherence at programme level, allowing learning from initial reforms to be systematically applied to the design, guidance and resourcing of subsequent reforms.

[108] HM Treasury (2026). Magenta Book: Central Government guidance on evaluation. The Magenta Book - GOV.UK

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### 5.2.1 Process evaluation questions

The process evaluation should aim to answer the following questions, maintaining a programme-level lens:

1. **How effectively has MWP been implemented as a programme?**
    - **a.** To what extent has implementation occurred as planned, including the sequencing and timing of reforms?
    - **b.** To what extent, and how, have communications, guidance and engagement activities supported implementation?
    - **c.** What barriers and facilitators have influenced implementation?
    - **d.** What unintended consequences or emerging risks have arisen during implementation, and what, if any, adaptations have been made in response?

2. **To what extent have the Government coordinated the implementation of MWP with delivery bodies and other stakeholders?**
    - **a.** Whom did the Government coordinate with? What value did these collaborations bring?
    - **b.** Were there any processes that were particularly efficient, or inefficient?

3. **To what extent are employers and workers aware of and understand their new obligations and rights?**
    - **a.** How is understanding related to behavioural changes?
    - **b.** To what extent are employers able to implement multiple reforms across MWP?
    - **c.** How have business practices had to change to accommodate for MWP?
    - **d.** How have employees been informed about their new rights, and have they started acting on them?
    - **e.** How have stakeholder perceptions of the MWP reforms influenced implementation and compliance?

4. **How does awareness and understanding vary by region, sector, company size, employee/worker characteristics and employment arrangements?**

5. **How do wider policy, economic and labour market developments influence the implementation of MWP?**

### 5.2.2 Process evaluation methods

A range of approaches could be used to evaluate the implementation of MWP, including process tracing, output or performance monitoring, focus groups or ethnographic methods.[109] However, given the scale of the programme, the existence of individual policy-level evaluations, and the need to generate evidence that is proportionate and actionable, the methods proposed below focus on

[109] HM Treasury (2026). Magenta Book: Central Government guidance on evaluation. The Magenta Book - GOV.UK

those most likely to provide robust evidence on programme implementation while avoiding unnecessary duplication of effort. As noted above, the process evaluation should be undertaken early in the implementation period to provide timely learnings that can be used to refine and improve programme delivery. The years referred to here relate to the phased evaluation timeline (Section 6 which builds on policy timelines and assumptions consulted as part of this study).

Whilst the process evaluation warrants its own set of activities, this is also an opportunity to baseline against the outcomes and impacts listed in the programme-level ToC to ensure change can be measured in the impact evaluation. Year 3 will represent a transition phase as many reforms will be implemented and data collection can focus on identified any early signals of shifts in outcomes.

### Secondary data analysis

MWP is a programme of policies, with Government departments conducting bottom-up individual reform level evaluations, often likely to include process evaluations. As a first step to understanding the implementation of MWP, a synthesis of these process evaluations should be conducted. Given the phased implementation of MWP, evidence from individual reform-level evaluations will not be available for all reforms at the outset of the programme-level evaluation. As such, the process evaluation should adopt an iterative approach. Early stages should draw on available monitoring data, implementation documentation and any emerging findings from evaluations of the policy-level reforms to establish an initial understanding of implementation progress. As evidence accumulates over time, findings from individual policy evaluations should be periodically synthesised to identify common implementation challenges, barriers, facilitators and lessons across themes. This synthesis should be used to refine programme-level research priorities and ensure that primary data collection focuses on outstanding evidence gaps rather than duplicating evidence that is already available.

### Depth interviews with delivery stakeholders

Depth interviews with a range of delivery stakeholders, including (but not limited to) BIST, Acas, the EHRC, ET, delivery bodies and trade unions, should be conducted to understand how MWP was coordinated and implemented across government and the wider delivery system.

To maintain focus at the MWP programme level and avoid duplication with individual policy evaluations, interviews should be structured to capture systemic insights rather than policy-specific implementation details. The topic guides should explore; governance arrangements, cross-theme integration and dependencies, expectations for processes, how reforms across different themes are being sequenced and coordinated, identifying interdependencies and understanding resource allocation across the programme. Attention will be given to programme-wide enablers and barriers, including common implementation challenges, the effectiveness of shared communication strategies, and capacity constraints affecting the programme such as enforcement capacity. Interviews will also probe for system-level effects including unintended interactions between reforms, cumulative burden on employers implementing multiple changes simultaneously, and early signals of programme-level behavioural changes that would not be visible through

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individual policy evaluations. By Year 3 individuals should be able to fully reflect on the implementation process and any lessons learned.

- **Frequency and sample:** These interviews could be conducted annually in Year 1 of the evaluation (see Section 6 for more detail on timelines) and Year 2, where possible using the same sample for longitudinal data. This approach allows for timely feedback as most reforms are being implemented but enables insight in the following year to understand how processes changed and how to further improve these. A third wave in Year 3 may be necessary where some reforms are developed later.
- **Total waves:** Two waves of qualitative fieldwork (one in Year 1 and one in Year 2). Possibly three, dependant on reform implementation timelines.

### Depth interviews with employers

Depth interviews with employers, sampled across sectors and employer sizes should be conducted to understand employers' experiences of implementing multiple MWP reforms concurrently. The sample should look to cover sectors where compounding effects are expected (see Section 4.2.2). To maintain focus at the programme level, topic guides should cover awareness and understanding of the programme overall, feedback on the usefulness of Government or third-party guidance and communications, the way employees have reacted to their communications, the extent to which employers felt able to implement multiple reforms simultaneously and any potential changes in practice or behaviour as a result. These interviews should explore resource requirements, administrative changes and operational challenges, and how these varied across different types of employers. The interviews should also look to identify interactions between reforms that employers have experienced, and how the wider context has influenced employers' ability to comply with new requirements. By Year 3 individuals should be able to fully on how the implementation of the reforms was rolled out across their workplace.

- **Frequency and sample:** These interviews could be conducted annually in Year 1 (see Section 6 for more detail on timelines) and Year 2, where possible using the same sample for longitudinal data. A third wave in Year 3 may be necessary where some reforms are developed later.
- **Total waves:** Two waves of qualitative fieldwork (one in Year 1 and one in Year 2). Possibly three depending on reform implementation timelines.

### Surveys with employers

A survey of employers would provide representative evidence on awareness, understanding and implementation of MWP across the wider business population. However, the need for this information should be balanced against the survey fatigue among employers, considering any employer surveys (and their timing) in the policy-level evaluations. The MWP-level employer survey should measure awareness of the MWP package and its reforms, understanding of employer obligations, experiences of implementing multiple reforms concurrently and what adaptions have been made to policies or process. It could also collect evidence on implementation costs and

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resource requirements, including administrative burden, staffing requirements and time spent adapting policies and processes. The survey should be designed to enable analysis by sector, employer size and other organisational characteristics. Findings should be triangulated with qualitative research to provide both breadth and depth of understanding regarding implementation experiences.

- **Frequency and administration:** This survey should be administered directly to businesses using details provided by BIST, via a commercial service provider. In Year 1 the survey should aim to capture as much nuance as possible as implementation is underway. Another in Year 2 should provide an update once implementation is coming to an end and initial processes have been worked through. This provides sufficient evidence to monitor changes in employer awareness, preparedness and implementation while minimising respondent burden and evaluation costs. The qualitative fieldwork should complement the survey during the first two years to capture emerging implementation issues and enable learning to inform ongoing delivery. Year 1 will also be used for baselining for the impact evaluation and Year 2 and 3 can pick up any early changes that may have occurred.
- **Total waves:** Three waves of quantitative fieldwork (one in Year 1, one in Year 2 and one in Year 3). The focus of the survey in Year 3 should shift to impact evaluation with a few remaining process questions for those reforms that are yet to be implemented. As a result, there may be three waves of quantitative fieldwork in the process evaluation phase, dependant on reform development.[110]

### Employee and worker survey

Similarly, an MWP-level survey of employees and workers, using a sampling approach that ensures representation across worker groups,[111] should be conducted to understand awareness and understanding of rights introduced through MWP. The survey should explore whether individuals are aware of relevant reforms, how they became aware of them, which communication channels were most influential, and whether they feel they have sufficient information to exercise their rights. To minimise overlap with the impact evaluation, the survey should focus primarily on awareness, communication and engagement processes and include baselining of outcomes and any early signals of change. Analysis should consider differences by worker characteristics, employment arrangements and sectors.

- **Frequency and administration:** This survey could be delivered using different approaches. One option is employer-facilitated recruitment, whereby participating employers distribute survey invitations to employees, who choose whether to participate voluntarily. This provides access to employees directly affected by the reforms, but the resulting sample will not be representative of the wider workforce and may be subject to selection bias. Probability-based household survey would offer high representativeness but may be too expensive to deliver. Alternatively, the survey could be administered through an established

[110] If this is not necessary as the evaluation develops, this 3rd wave should be added to the impact evaluation.
[111] This should cover all types of contracts (full-time, part-time), sectors, age groups, etc.

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online panel. This offers a cost-effective approach and, where a longitudinal panel is used, enables changes in employee awareness, experiences and perceptions to be tracked over time. However, careful sampling would be needed to ensure adequate representation of key sectors and worker groups. Annual survey waves are recommended during the early years of implementation, complemented by qualitative research to explore emerging implementation issues and employees' experiences in greater depth. Year 1 will also be used for baselining for the impact evaluation and Year 2 and 3 can pick up any early changes that may have occurred.

- **Total waves:** Three waves of quantitative fieldwork (one in Year 1, one in Year 2 and one in Year 3). The focus of the survey in Year 3 should shift to impact evaluation with a few remaining process questions for those reforms that are yet to be implemented. As a result, there may be three waves of quantitative fieldwork in the process evaluation phase, dependant on reform development.[112]

Whilst the qualitative and quantitative work will be taking place within the same years, these should be staggered to allow one form of fieldwork to inform the other. It is recommended that interviews start first, and these can inform survey design. All evidence should then be triangulated for analysis.

## 5.3 Impact evaluation

### 5.3.1 Impact evaluation questions

The impact evaluation should aim to establish the extent to which the MWP programme has contributed to its intended labour market outcomes and impacts. It should aim to answer the following questions:

6. **To what extent has MWP contributed to its intended outcomes and impacts?**
7. To what extent have the expected outcomes and impacts within each MWP theme been achieved, and what factors enabled or constrained their achievement?
8. How have interactions between MWP reforms influenced the programme's contribution to intended outcomes and impacts?
9. **To what extent and how has business and employee behaviours changed in response to the reforms?**
10. **What costs and benefits have employers and employees experienced as a result of the overall programme?**
11. How do these differ by region, sector, company size, employee/worker characteristics and employment arrangements?
12. **What, if any, positive or negative, unforeseen or unintended consequences have occurred?**

[112] If this is not necessary as the evaluation develops, this 3rd wave should be added to the impact evaluation.

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### 5.3.2 Impact evaluation design

There are three core designs used in impact evaluation which are listed below:

- **Experimental** which randomly assigns participants to a treatment or control group to assess causal impact of an intervention.
- **Quasi-experimental** which estimates the causal impact of an intervention without random assignment, but with an established counterfactual.
- **Theory-based** which explores causal chains as a result of an intervention whilst also considering the surrounding context. This method does not provide precise estimates of effect sizes.

An appropriate design for the impact evaluation follows guidance issued in the Magenta Book.[113] Below outline considerations across the three core methods, including recommendations to BIST regarding feasible and appropriate approaches for the evaluation of MWP.

#### Experimental design

Experimental methods were ruled out at an early stage. MWP reforms are implemented nationally and apply broadly across the labour market. As a result, it is not possible to randomly assign individuals, employers or sectors to treatment and control groups.

#### Quasi-experimental designs (QEDs)

Quasi-experimental approaches were also considered. These methods seek to estimate causal effects by constructing a credible counterfactual, typically using a comparison group, variation in exposure to an intervention, or pre-intervention trends. QEDs may be feasible and valuable for evaluating **individual MWP reforms or specific outcomes**, particularly where implementation creates identifiable variation in exposure or where sufficiently rich longitudinal data are available. However, their suitability is more limited for estimating the **programme-level impact of MWP as a package**, for several reasons:

- **Can affected and unaffected groups be compared?** Potential comparison groups, including employers and workers in jurisdictions not affected by MWP (i.e. Northern Ireland), were explored. However, differences in labour market structures, regulatory environments, industrial relations systems and business practices mean that these groups are likely to differ systematically from those affected by MWP. Whilst some observable differences could potentially be controlled for using administrative data, many important factors such as organisational culture, management practices and workplace relations are difficult to measure robustly. This limits the credibility of programme-level approaches that depend on comparable treated and untreated groups, including difference-in-differences and matching approaches.

[113] HM Treasury (2026). Magenta Book: Central Government guidance on evaluation. The Magenta Book - GOV.UK

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- **Is there sufficient variation in exposure to the intervention?** MWP is a national programme comprising multiple reforms that affect most employers and workers directly or indirectly. Although implementation is phased and some reforms include voluntary or transitional periods, exposure to MWP as a whole is not sufficiently discrete to create robust programme-level treatment and comparison groups. Designs exploiting thresholds, eligibility rules or differential timing may nevertheless be appropriate for **individual reforms where such variation exists**. Their feasibility should therefore be assessed as part of reform-level evaluations rather than ruled out altogether.
- **Is sufficient historical and administrative data available to construct a counterfactual?** Some outcomes identified in the programme ToC, including worker voice, trust and confidence, perceptions of fairness, workplace culture and knowledge transfer, are not routinely measured through long-running, consistently defined administrative datasets. This constrains approaches that require substantial pre-intervention outcome histories. **Synthetic control methods could potentially be considered for particular reform–outcome combinations where a suitable unaffected comparison units and sufficiently long and comparable pre-intervention outcome series can be identified.** However, their applicability to the overall MWP programme is likely to be limited because MWP is implemented across Great Britain and many programme-level outcomes lack the consistent longitudinal measurement required to construct and validate a credible synthetic counterfactual.
- **What would a QED estimate tell us about MWP as a programme?** Even where a QED can credibly estimate the causal effect of an individual reform on a particular outcome, this does not necessarily identify the contribution of MWP as a package. The programme comprises multiple reforms introduced over different timescales and is expected to generate impacts through interactions between policies, themes and stakeholders. Reform-level causal estimates therefore provide important evidence about particular components of MWP, but do not by themselves establish how the combination of reforms has contributed to programme-level outcomes or through which mechanisms these effects have occurred.

These considerations suggest that QEDs should **not be ruled out as part of the wider MWP evaluation architecture**. Rather, their role should differ by level of evaluation. At the individual reform level, QEDs — including difference-in-differences, regression discontinuity or synthetic control methods — should be considered where the intervention design and available data provide a credible source of counterfactual variation. At the programme level, however, the national scope of MWP, overlapping exposure to multiple reforms, limitations in comparable outcome data, and the importance of interactions between reforms mean that no single QED is likely to provide a credible counterfactual for MWP as a whole. Contribution Analysis is therefore proposed as the primary programme-level approach. Robust causal estimates generated by reform-level QEDs should form part of the evidence base used within the Contribution Analysis, alongside monitoring data, surveys, qualitative evidence and other reform-level evaluations.

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## Theory-based impact evaluation

The complex, systems-wide nature of MWP suggests that a theory-based approach will be the most suitable. A combination of different methods and approaches may be useful to explore outcomes and impacts (and contribution) at the programme- and at theme-level, focussing on contribution rather than attribution.

Theory-based impact evaluation (TBIE) is particularly suitable for evaluation of complex, system-wide interventions with long timescales and situations where no counterfactual is available.[114] TBIE approaches are based on a ToC, which sets out not only the expected outcomes and impacts, but also the underpinning logic of how specific activities and interventions are expected to cause these (the causal pathways).[115] In addition to simply capturing outcomes and impacts, TBIE approaches then enable validation of these pathways to assess contribution (whether, how, why, where) of the specific intervention to these outcomes and impacts.[116]

Table 5.2 sets out the main TBIE methods considered for the programme-level evaluation of MWP, and an assessment of their respective feasibility and relevance.

[114] Rogers, P. J. (2008). Using programme theory to evaluate complicated and complex aspects of interventions. *Evaluation*, *14*(1), 29-48.
[115] Funnell, S. C., & Rogers, P. J. (2011). Purposeful program theory: Effective use of theories of change and logic models. John Wiley & Sons.
[116] Leeuw, F. L. (2012). Linking theory-based evaluation and contribution analysis: Three problems and a few solutions. *Evaluation*, *18*(3), 348-363.

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### Table 5.2: Theory-based methods

| Recommendation | Rationale | How it addresses evaluation questions | Additional considerations |
|---|---|---|---|
| **Contribution analysis** | | | |
| Contribution analysis is a systematic approach to understanding whether and how an intervention has contributed to observed outcomes through testing a ToC against multiple sources of evidence. It builds a reasoned case for contribution by confirming that expected results occurred, the ToC is supported by evidence, and other influencing factors have been assessed and accounted for. In practice, this involves establishing a framework of specific contribution claims linked to the ToC, then iteratively collecting and assessing evidence to test, refine or refute these claims throughout the evaluation period.[117] | | | |
| Recommended primary method for the MWP programme-level evaluation.<br>• Establish a connected contribution analysis framework at programme, theme and policy level based on the ToC and logic models.<br>• Contribution claims could specifically test the interactions between themes identified in Section 4.2 (e.g., enforcement as an enabler throughout).<br>• Establish regular (e.g., annual) review periods to iteratively test the framework based on available evidence to recognise the interconnected and thus moving nature of the underlying system. | Explicitly designed for complex, system-wide interventions without a counterfactual, such as MWP.<br><br>Works from an explicit ToC, iteratively assembles evidence on causal steps, examines rival explanations and arrives at a reasoned judgement on the strength and nature of contribution. Well aligned with the MWP design (six interacting themes, national scope) and with the evaluation questions on implementation, contribution, distribution of effects, unintended consequences and value for money. | • Testing programme- and theme-level ToC.<br>• Addresses impact evaluation questions by assessing whether, and to what extent, MWP has contributed to improvements in impacts, using triangulation of evidence from multiple sources (monitoring data, surveys, interviews, case studies, documentary and administrative data, supported by a strength of evidence assessment.<br>• Treats hypothesised unintended consequences as testable pathways, integrates emergent findings, and assesses their scale, mechanisms and distribution. | • Would need consideration of strength of evidence throughout, i.e. integration of a strength of evidence framework or combination with methodology such as process tracing.<br>• Outcomes (expected and unexpected benefits and costs) should be mapped for employers and employees across sectors, employer types and worker groups and contribution claims broken down accordingly to determine the causal mechanisms. |
| **Realist Evaluation** | | | |

[117] Mayne, J. (2001). Addressing attribution through contribution analysis: using performance measures sensibly. *Canadian journal of program evaluation*, *16*(1), 1-24.

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| Recommendation | Rationale | How it addresses evaluation questions | Additional considerations |
|---|---|---|---|
| Realist evaluation seeks to understand 'what works, for whom and in what circumstances' by testing how specific causal mechanisms operate within particular contexts to produce outcomes. The approach recognises that programmes work differently in different settings. Implementing a realist evaluation approach involves developing specific Context-Mechanism-Outcome (CMO) configurations as testable hypotheses, then systematically gathering evidence to refine understanding of how mechanisms work differently across contexts.[118] | | | |
| Suitable to test underlying theories of how different combinations of contexts and mechanisms lead to different outcomes.<br>• Development of a few priority CMO configurations for contexts where MWP is expected to operate differently (e.g., sectors) and where multiple themes interact (e.g., compounding impacts).<br>• Can explain variation in contribution analysis results and identify where system-level interactions amplify or reduce effects. | MWP operates in diverse contexts (different sectors, regions, levels of unionisation, employer size and HR capacity) across six broad themes. These contextual differences shape how mechanisms such as employer compliance, avoidance, worker claiming and union mobilisation operate in practice. Realist principles to supplement other methods may therefore be an appropriate approach, with potential focus on key causal pathways or themes. | • Helps explain variation in how effectively reforms are implemented.<br>• Explains how and why the package contributes differently to impacts across contexts.<br>• Explains why unintended consequences emerge in particular sectors or groups. | • Could be applied selectively to specific themes or causal pathways.<br>• Requires development and testing of Context–Mechanism–Outcome (CMO) propositions.<br>• Requires substantial qualitative evidence and analytical resource. |
| **Process tracing** | | | |
| Process tracing is a structured method for testing whether a hypothesised causal mechanism explains an observed outcome by examining evidence that would only be present if the theory were true or false. It uses specific evidence tests to systematically evaluate causal claims in single cases where no counterfactual exists. Implementation involves identifying observable implications that must be present for the causal mechanism to be valid, then systematically searching for and testing this evidence to confirm or disconfirm the hypotheses.[119] | | | |
| Potential to use for a small number of causal links (deep dives) at the theme-level.<br>• Could be used where system interactions are strong but the existing evidence base for a causal mechanism is weak – e.g., whether the introduction of the FWA will critically enable enforcement mechanisms to facilitate other policies' benefits. | Process tracing tests the contribution of an intervention to impact, paying particular attention to alternative explanations. It is a resource-intensive approach and better suited for concrete outcomes rather than programme-wide impacts with likely various drivers beyond the reforms themselves. | • Provides an assessment of strength of evidence for key causal claims.<br>• Explicitly considers alternative explanations to support assessment of contribution within a complex setting. | • Could be integrated at the theme-level. |
| **Outcome harvesting** | | | |

[118] Pawson, R. & Tilley, N. (1997). *Realist evaluation*.
[119] Collier, D. (2011). Understanding process tracing. *PS: political science & politics*, 44(4), pp.823-830.

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| Recommendation | Rationale | How it addresses evaluation questions | Additional considerations |
|---|---|---|---|
| Outcome harvesting identifies, describes and verifies changes brought about by an intervention by working backwards from observed outcomes to assess contribution, rather than the other way around (monitoring and analysing pre-determined indicators based on expected outcomes). This is often used when a full range of results of an intervention is not known upfront. In practice, this is often done using participatory methods where stakeholders identify and describe observed changes, which are then verified through multiple sources and analysed to determine the intervention's contribution to these emergent outcomes.[120] | | | |
| Valuable for identifying unexpected outcomes but insufficient stand-alone to assess contribution.<br>• Participatory processes (e.g., focus groups or workshops) could be carried out regularly with key groups of stakeholders, e.g., employees in impacted sectors, depending on the timing of policy implementation.<br>• Verified outcomes would be fed iteratively into the contribution analysis framework and ToC to refine causal pathways. | The theme-level models already anticipate several unintended pathways, but given the scale and complexity of MWP, additional unexpected effects, both positive and negative, are likely. Outcome harvesting is well suited to surfacing such emergent outcomes, including cultural and relational changes. | • Enables identification of unexpected outcomes not included in the ToC, therefore mitigating potential positivity bias in evaluation framework development.<br>• Does not assess contribution. | • To be combined with other methods to assess contribution of MWP to these outcomes<br>• Timing of the reforms and corresponding changes (as well as non-linearity of those changes) means outcome harvesting should be a regular process rather than a one-off exercise. |
| **Most Significant Change (MSC)** | | | |
| MSC is a participatory method that involves collecting stories of significant change through primary data collection and document analysis and systematically selecting the most important through stakeholder panels. It helps identify unexpected outcomes and builds shared understanding of programme value when impacts are diverse and difficult to predict. Implementation involves establishing domains of change, regularly collecting stories by programme staff from programme participants, then convening panels to review, discuss and select the most significant stories, using this deliberative process to understand programme value and impact.[121] | | | |
| • Limited applicability as a core programme-level method but could be used selectively to explore perceived changes and emergent outcomes among specific stakeholder groups.<br>• Could be applied (in conjunction with outcome harvesting above) to collect a small number of stories per sectors across cross-cutting domains of change (e.g., job quality, workplace relations, economic security) to explore cross-theme impacts. | MSC collects and systematically reviews stories of change from programme participants and stakeholders. It is particularly useful for identifying outcomes that were not anticipated in the original ToC and understanding which changes different stakeholders value most. However, it does not assess programme contribution and is less suited to evaluating complex system-level impacts across the MWP programme as a whole. | • Helps identify unexpected positive and negative outcomes.<br>• Provides insight into how different groups perceive and experience change.<br>• Can help understand which outcomes stakeholders consider most significant. | • Resource intensive due to collection, review and selection of change stories.<br>• Best applied to selected themes, sectors or stakeholder groups.<br>• Should be combined with other methods to assess contribution. |

[120] Wilson-Grau, R. & Britt, H. (2012). Outcome harvesting. *Cairo: Ford Foundation*.
[121] Davies, R. & Dart, J. (2005). The 'most significant change' (MSC) technique. *A guide to its use*, *10*.

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| Recommendation | Rationale | How it addresses evaluation questions | Additional considerations |
|---|---|---|---|
| **Contribution tracing** | | | |
| Contribution tracing combines process tracing principles with Bayesian probability to rigorously test contribution claims. It uses mixed-methods participatory approaches to gather evidence on the validity of specific claims, using mathematical formulas to quantify confidence levels. In practice, this involves conducting a structured 'contribution trial' workshop where stakeholders collectively identify what evidence would prove or disprove the contribution claim, followed by targeted evidence collection focusing only on high-value evidence and mathematical confidence updating. | | | |
| • Not suitable as a programme-wide approach<br>• Potentially useful for testing a small number of claims where system-wide impact depends on contested causal mechanisms and where contribution analysis leaves critical uncertainties about system-level effects, particularly where multiple themes must work together to achieve outcomes. | It strengthens TBIE by systematically assessing the strength of evidence supporting specific contribution claims and considering alternative explanations. It is particularly useful where decision-makers require greater confidence in whether an intervention contributed to an outcome. However, the large number of reforms, pathways and outcomes within MWP would make programme-wide application resource intensive and difficult to maintain consistently. | • Strengthens assessment of contribution for selected causal pathways.<br>• Provides a transparent approach to evaluating competing explanations.<br>• Supports stronger judgements about the credibility of key contribution claims. | • Most suitable for a small number of high-priority or contested contribution claims.<br>• Requires explicit specification of causal claims and supporting evidence.<br>• Shares similarities with Bayesian updating and Process Tracing and may overlap with these approaches if used simultaneously. |

Source: Authors' elaboration, 2026

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### 5.3.3 Recommended impact evaluation approach

Based on the nature of the underlying intervention and consideration of feasibility and relevance of different methods, **contribution analysis[122] was identified as a suitable method to directly address the core questions** about what has changed, and to what extent MWP contributed to these changes.

Contribution analysis is well-suited to analyse a portfolio of reforms and interconnected reforms and can build on the existing theme-level logic models, programme ToC, and systems mapping developed, which outline the expected structured causal pathways. Contribution analysis will use these iteratively to examine not only whether expected causal pathways have operated, but also how interactions between reforms, feedback loops and wider contextual factors have influenced observed outcomes.

Contribution analysis also helps address the attribution challenge, namely that there are various factors beyond the reforms themselves that could influence the expected outcomes (such as macroeconomic conditions, technological change, sectoral trends, demographic shifts, and other, connected policies), making it difficult to say what exactly the impact of MWP is. Contribution analysis addresses this challenge not by claiming definitive causal proof, but by building an evidenced line of reasoning that systematically examines whether observed changes align with theoretical predictions, tests rival explanations, and assesses the plausibility of MWP's contribution alongside other factors. This approach acknowledges that certainty about causation is not achievable, but that reasonable, evidence-based judgements about contribution can guide policy decisions.

However, selected complementary methods may be used where they add value to understanding particular themes or causal pathways. The use of such methods should be proportionate and targeted, reflecting differences in the feasibility and suitability of approaches across the programme. For example, realist-informed analysis could help explain how and why outcomes vary across different contexts, such as sectors, regions and employer types. Process tracing may be applied selectively to test a small number of strategically important causal pathways where evidence on causal contribution is particularly uncertain or contested. Outcome harvesting could also be used to identify unintended positive or negative consequences that may not be captured through the main evaluation framework.

A **mixed-methods approach**, combining both evidence from secondary sources (including policy-level evaluations, monitoring data and government statistics) and targeted primary data collection with stakeholders will be needed to ensure a sufficient evidence base for the evaluation. Such data collection (including the interviews and surveys presented above, as well as programme-level case studies and data sources detailed below) would focus on outcomes and impacts observed and experienced and unpicking the causal chain that connects these to the MWP reforms.

[122] Mayne, J. (2001). Addressing attribution through contribution analysis: using performance measures sensibly. *Canadian journal of program evaluation*, *16*(1), 1-24.

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Analysis of data should systematically compare observed implementation patterns and outcome trends against the theoretical predictions from the logic models and ToC, examining changes over time (before/after reforms), variations across sectors with different exposure levels, and relationships between cross-theme indicators. This would support interpretation, identifying whether, and how impacts may be different in some settings than others and whether the timing and distribution of outcomes align with the programme's ToC.

### Box 5.1: Practical application of contribution analysis for MWP

For MWP, contribution analysis should be organised around a series of explicit contribution claims derived from the programme ToC and systems map. These claims should be tested using multiple sources of evidence and reviewed iteratively as implementation progresses. Where possible, contribution claims should be benchmarked against the expected effects set out in the ERA 2025 economic analysis and supporting impact assessments. This provides a transparent reference point for judging whether observed changes are broadly in line with, above or below what was anticipated. Claims and their success criteria should be registered in advance before data collection begins.

The purpose is not to prove causality conclusively, but rather assess whether the available evidence supports, weakens or challenges the plausibility of each contribution claim. An example that illustrates this is provided below.

**Example claim:** Reforms within the Voice at Work theme contributed to improved Fair Pay outcomes through strengthening worker representation and collective bargaining.

**Potential evidence to include:**

- Evidence that trade union access, recognition and representation increased following implementation;
- Evidence that collective bargaining activity increased across affected sectors, particularly in sectors with historically low levels of worker representation and bargaining;
- Qualitative evidence from employers, employees/workers and trade union representatives suggesting that bargaining arrangements positively influenced pay and conditions;
- Evidence that improvements in pay and conditions occurred in sectors where bargaining activity increased;
- Evidence that the timing of these changes aligns with the implementation of relevant reforms.

**Alternative explanations:** These should be identified and examined to assess whether they provide a more convincing explanation for the observed outcomes. For this example, these may include changes in minimum wage policy, sector-specific workforce shortages, inflationary pressures, and employer-led pay reforms that occurred independently of MWP.

**Confidence in contribution claim:** Each claim should be assessed against a transparent framework that determines the level of confidence in the claim. For example:

| Confidence level | Interpretation |
|---|---|
| **Very high confidence** | All evidence streams (see Section 5.3) converge in support of the contribution claim. No major contradictory evidence is identified. |
| **High confidence** | Most evidence streams support the claim. Minor inconsistencies exist but do not materially alter the overall conclusion. The strongest available evidence supports the claim. |
| **Moderate confidence** | Some evidence streams support the claim, while others provide contradictory or inconclusive findings. The overall balance of evidence is positive, but uncertainty remains. |
| **Low confidence** | Most evidence streams contradict the claim or provide insufficient support. Alternative explanations are more consistent with the available evidence. |
| **No confidence** | All major evidence streams contradict the claim or support an alternative explanation. |

When evidence streams conflict, greater weight should be given to evidence that is methodologically robust, directly relevant to the contribution claim, and less susceptible to bias. For example, well-designed survey or

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administrative data may provide stronger evidence regarding the extent of change, while qualitative evidence may provide stronger evidence regarding the mechanisms through which change occurred. The overall judgement should reflect the balance and quality of evidence rather than a simple count of supporting or opposing sources.

**Review of contribution claims and programme ToC:**
Contribution analysis is inherently iterative, with contribution claims tested and refined as evidence accumulates. Contribution claims should be reviewed periodically, drawing on programme-level research, monitoring data, administrative datasets and individual reform-level evaluations.

The initial ToC provides a basis for assessment, but the evaluation should remain open to revising assumptions about how change occurs and the relative importance of different causal pathways. As implementation progresses, evidence may strengthen, weaken or challenge particular contribution claims, requiring further investigation of specific mechanisms, contextual influences or unintended consequences. This iterative approach is particularly important for MWP given the scale of the programme, the interactions between reforms and the uncertainty surrounding how different elements of the programme will combine to influence labour market outcomes. This would also enable scope to incorporate potential future reforms beyond the current MWP programme.

Where evidence consistently contradicts an assumed pathway, or where new and recurring mechanisms emerge that are not reflected in the existing programme theory, the programme ToC should be updated accordingly. This ensures that the evaluation remains responsive to the evolving nature of the programme while maintaining a transparent record of how conclusions have been reached.

Source: Authors' elaboration, 2026

### 5.3.4 Impact evaluation data collection methods

Given the universal nature of the MWP policies, the attribution of impacts to this programme will be difficult. Consequently, the use of the data sources presented in the indicator framework is predominantly focussed on the monitoring of the MWP legislative changes, rather than employed for impact detection through quantitative counterfactual approaches. Given the recommended use of TBIE, quantitative data will also be used to substantiate, where possible, specific contribution claims and provide additional evidence in relation to the expected outcomes and impacts. For contribution analysis evidence will be required to support causal claims. This will expand upon the data collection exercises that were set up in the process evaluation phase (Section 5.2), to maximise efficiencies and examine changes from their baselines (where these are available – see Section 5.5). Year 3 will be a transition period as the process evaluation moves to start collecting some early impact evaluation metrics (early changes from baseline) but maintains some relevant process questions for later reforms that are implemented (this is detailed in Section 5.2.2). Data collection should shift to the impact evaluation from Year 4 in Phase 2 when medium-term outcomes are expected to materialise.

#### Depth interviews with employees and workers

These should explore how MWP reforms have influenced their employment experiences, job quality, and workplace relationships. Interviews will probe experiences of exercising new rights, changes in job security and working conditions, perceptions of fairness and voice, and any unintended consequences. The sample should prioritise employers and workers in sectors experiencing multiple reforms (social care, hospitality, retail) and those in traditionally insecure employment.

- **Frequency and sample:** Annual interviews starting in Year 4, with the same participants where possible to track changes over time.
- **Total waves:** 2 waves (annually in Years 4-5).

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## Depth interviews with employers

Building on process evaluation interviews, impact-focused employer interviews will examine behavioural changes, business outcomes, and organisational adaptations resulting from MWP. Topics will include changes to recruitment and retention strategies, workforce composition, investment in training and systems, employee relations outcomes, and perceived costs and benefits. Interviews will explore how multiple reforms interact to influence business decisions and whether outcomes vary by sector or employer characteristics.

- **Frequency and sample:** Annual interviews from Year 4, using a mix of continuing participants from process evaluation and fresh samples to capture diverse experiences.
- **Total waves:** Two waves (annually in Years 4-5).

## Employee outcome survey

The survey should use the same sampling and methodology as the process evaluation surveys used for baselining and early impact detection. This survey should track indicators such as job satisfaction, financial security, work-life balance, perceptions of fairness, experience of workplace voice, and awareness of rights being exercised. This complements the process evaluation's survey by focusing on experienced outcomes rather than knowledge of reforms.

- **Frequency and administration:** Annual surveys from Year 4-5 using employer-facilitated recruitment survey, probability-based household survey or online panels, with boost samples for priority sectors.
- **Total waves**: Two waves (annually Years 4-5).

## Employer outcome survey

A survey of employers should aim to quantify changes in workforce outcomes, business practices, and organisational performance following MWP implementation. This will utilise a similarly representative sample that captured baseline metrics in Year 1. Measures will include staff turnover and retention rates, recruitment difficulties, business investment, dispute resolution activity, and perceived productivity impacts. The survey will enable analysis of how outcomes vary by sector, size, and exposure to different reform combinations.

- **Frequency and administration:** Annual surveys from Year 4 administered through business databases or commercial panels with sector quotas.
- **Total waves:** Two waves (annually Years 4-5).

## Programme-level case studies

A small number of longitudinal case studies could be undertaken to provide an in-depth understanding of how multiple MWP reforms are implemented and experienced within real organisational settings. Unlike standalone interviews or surveys, case studies could draw together multiple sources of evidence – including employer and employee interviews, documentary evidence, observations where appropriate, and relevant organisational data – to understand how reforms

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interact over time within the same workplace. Case studies should purposively sample organisations across sectors, employer sizes and workforce characteristics, with particular attention to sectors affected by multiple reforms (for example, social care, hospitality and retail). Repeated engagement with the same organisations over the implementation period would enable the evaluation to examine organisational adaptation, unintended consequences, interactions between reforms, and the mechanisms through which programme-level outcomes emerge. Depending on the evaluation questions, individual case studies could incorporate additional methods, such as longitudinal interviews with employees and managers, workplace observation or ethnographic approaches, where these would provide deeper insight into organisational change and workers' lived experiences. These case studies should be used across both the process and impact evaluation. For the impact evaluation, case studies would provide detailed evidence to test causal pathways in the programme ToC, examining whether anticipated mechanisms operated in practice and exploring alternative explanations for observed changes. Findings would therefore provide one source of evidence for the programme-level Contribution Analysis, rather than being used independently to attribute impacts to MWP.

- **Frequency and administration:** Case studies should be conducted at key implementation points rather than on a fixed schedule. Each case should involve repeated engagement with the same organisation and, where feasible, the same employees, managers and representatives. Evidence could include interviews, workplace documents, observations and relevant organisational data.
- **Total waves:** Three waves over approximately three years: an initial baseline or early implementation wave, a follow-up during implementation, and a final wave once the reforms have had time to become embedded.

## Approach to monitoring and secondary data

The MWP programme will be delivered through a comprehensive package of legislative reforms, rather than through traditional, direct government interventions (such as the provision of grant funding or training schemes). Because of this, bespoke Monitoring Information (MI) or ad hoc scheme data will not be routinely collected for each individual policy change. Instead, the impact evaluation of the MWP policies will rely primarily on existing secondary datasets. It is expected that the shifts in the labour market and business environment resulting from these legislative changes will be naturally reflected within existing administrative data sources and publicly available datasets. Where these secondary sources do not capture the specific variables required to fully evaluate the programme, supplementary primary data will need to be collected through ad hoc surveys or qualitative interviews. Each of these data types is discussed below.

## Administrative datasets

A key source of information on the outcomes associated with the changes introduced by the MWP programme, will be administrative datasets. Although attribution of causality will be challenging with these data, these cover several relevant indicators for the programme overall as well as for the six themes. Table 5.3 below offers a description of the main datasets, their pros and cons and

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whether they need to be accessed securely or are publicly available. More details on these datasets and the associated variables that will be used for monitoring and evaluation purposes, are presented separately in the indicator framework reported in Appendix 3.

Access to the Office for National Statistics (ONS) Secure Research Service (SRS) will be required to access the granular data that sits behind the publicly accessible datasets.

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**Table 5.3 Key data sources used in an evaluation of MWP**

| Data source | Years covered / frequency | Description | Pros and cons | Theme | SRS access required |
|---|---|---|---|---|---|
| **Labour Force Survey (LFS)**[123] | 1992-present; quarterly | Large-scale household survey of employment, hours, pay and working conditions in the UK. In this evaluation it will be used to track changes in contract type, earnings distribution, hours worked, job security and union membership. | + Large sample; disaggregation by sector, contract type and gender<br>- Non-response issues; Some variables only annual or periodic; sector-level samples can be small; Transformed LFS methodological variation. | All themes | Yes |
| **Annual Survey of Hours and Earnings (ASHE)** | 1997-present; annual | The ASHE gives data on the levels, distribution and make-up or earnings and hours worked for UK employees and can be linked to firm level data. The data includes a panel dataset of workers whose wages are tracked each year. Using disaggregate earnings data broken down by region, industry and occupation, this data can be to track the pay distribution, the union wage premium, and the gender pay gap over time. | + More accurate than self-reported earnings; covers full pay distribution<br>- Excludes self-employed individuals | All themes | Yes |
| **Business Structure Database (BSD)** | 1997-present; annual | This dataset provides yearly longitudinal records of both employment and turnover for firms registered for VAT and PAYE. It can be used to link employee data with firm level performance and to calculate measures of firms' productivity | + Firm-level data; enables linked analysis with ASHE; broad coverage<br>- Attribution to MWP reforms very difficult at firm level; productivity effects are detectable after at least 5 years<br>- This dataset is affected by significant data lags | Insecure Work, Voice at Work, Fair Pay, Enforcing Rights at Work | Yes |
| **Annual Business Survey (ABS)** | 1997-present; annual | The ABS is a mandatory survey for large firms with 250 or more employees, as well as a sample survey for small to medium-sized enterprises every year. ONS employs this survey to generate estimates of the total economic output (GVA) and other macroeconomic aggregates. However, the micro-data from the ABS could be utilised to provide observations on GVA and generate productivity estimates. | + Firm-level data; enables linked analysis with ASHE and BSD; broad coverage<br>- Attribution to MWP reforms very difficult at firm level; productivity effects are detectable after at least 5 years<br>- Potential issues with small sample sizes as it is a survey not a sampling frame like the BSD | Insecure Work, Voice at Work, Fair Pay, Enforcing Rights at Work | Yes |

[123] The Transformed Labour Force Survey (TFLS), introduced in March 2020 and currently being phased in as the successor to the LFS, uses a different survey design and methodology; consequently, there may be differences between TLFS and historical LFS estimates that reflect methodological change as well as underlying labour market trends. The evaluation should review ONS guidance on comparability at each phase and document any adjustments made.

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| Data source | Years covered / frequency | Description | Pros and cons | Theme | SRS access required |
|---|---|---|---|---|---|
| **Understanding Society (USoc)** | 2009-present; annual | Longitudinal household panel survey tracking individuals over time across a wide range of topics. Will be used to monitor job satisfaction, job security, wellbeing, flexible working take-up and work-life balance, particularly as medium and longer-term outcomes develop. | + Longitudinal design; rich wellbeing and job quality measures; links to biomarkers<br>- Self-reported; national-level changes likely to be small; attribution to specific reforms difficult | All themes | Yes (for data with high level of disclosure, e.g. data of birth, postcode etc) |
| **HMRC PAYE Data** | 2014-present; monthly | Dataset of payrolled employees detailing pay. If individual level data was available this would provide; pay, income tax and National Insurance Contributions, student loan deductions, pension contributions paid via payroll and pay-rolled benefits. | + Comprehensive PAYE worker coverage<br>- Difficult to gain access to granular data<br>- Does not capture self-employed or informal workers | All themes | Yes (though publicly accessibly high level information is available) |
| **MoJ Tribunal Statistics** | 2008-present; quarterly | Official statistics on Employment Tribunal receipts, disposals, outcomes and awards published by the Ministry of Justice. Will be used to track volumes and types of claims across MWP-relevant jurisdictions, including unfair dismissal, discrimination, and NMW claims. | + Quarterly cadence; covers all claim types; long time series<br>- Initial rise in claims likely reflects increased awareness not worsening conditions; ET backlog affects timing of data | Insecure Work, Equality, Fair Pay, Enforcing Rights at Work | Publicly available |
| **Acas Statistical Bulletin** | 2014-present; quarterly | Quarterly data on Acas helpline call volumes and early conciliation notifications, disaggregated by topic and case type. Will serve as an early signal of worker awareness and dispute trends, particularly in the period before ET claims data matures. | + Quarterly; topic disaggregation; captures pre-ET dispute activity<br>- Only captures those who sought help; not representative of all workers | Voice at work, Family Friendly Rights | Publicly available |
| **CAC Annual Report** | 2000-present; annual | Annual report on Central Arbitration Committee activity covering union recognition applications, collective bargaining referrals and outcomes. Can be used to track whether employers are becoming more willing to recognise unions voluntarily and engage in collective bargaining without contest. | + Directly tracks formal collective bargaining activity; no equivalent source exists<br>- Only captures formal recognition routes; informal engagement not measured; annual lag | Voice at Work, Enforcing Rights at Work, Family Friendly Rights | Publicly available |
| **BIST NMW Enforcement and Compliance Data** | 2014-present; annual | Published data on National Minimum Wage enforcement activity including investigations opened, penalties issued and arrears recovered. In this evaluation it will be used to monitor compliance trends and the effectiveness of enforcement activity, and will complement FWA data once the agency becomes operational. | + Direct compliance measure; covers arrears recovered for workers<br>- Publication frequency uncertain going forward; captures formal enforcement only, not voluntary compliance | Fair Pay, Enforcing Rights at Work | Publicly available |

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| Data source | Years covered / frequency | Description | Pros and cons | Theme | SRS access required |
|---|---|---|---|---|---|
| **ONS Labour Disputes Statistics** | 1990-present; monthly | Monthly statistics on industrial stoppages, working days lost and workers involved in disputes. In this evaluation it will be used to track whether Voice at Work reforms lead to fewer and shorter disputes over time as collective bargaining becomes more effective. | + Monthly frequency; long time series; sector breakdown available<br>- Captures strikes only, not other forms of workplace dispute; legislative effects on bargaining take time to feed through | Voice in the Workplace, Enforcing Rights at Work | Publicly available |
| **CIPD Good Work Index** | 2018-present; annual | Annual survey of UK workers covering job quality dimensions including pay satisfaction, wellbeing, work-life balance and management practices. Supplements official sources on subjective job quality, particularly for programme-level wellbeing tracking where administrative data is limited. | + Covers job quality dimensions not captured in official sources<br>- Proprietary; research access process unclear; survey questions may change year-on-year | Programme level, Fair Pay, Family Friendly Rights | Report publicly available |
| **Centre for Business Research – Labour Regulation Index (LRI) dataset** | 1970-2022 | Annual datasets covering 30 countries ranking the strength and weaknesses of labour laws. Specifically the LRI dataset code labour laws, shareholder protection, and creditor protection using leximetric coding methodology. | + Good time coverage<br>+ Attempts to assign a numerical value to laws<br>- Only covers the period pre- MWP (so far it is up to 2022). Not clear when the next iteration will be | All themes | Publicly available |
| **HR1 Forms Administrative Data** | 2019-present; monthly | Monthly dataset across the UK, broken down by region and sector, of the number of HR1 forms and employers which signifies potential redundancies. This will be particularly important for the Insecure Work theme that has a focus on collective redundancies. | + Good time coverage; monthly cadence<br>+ High legal compliance from employers<br>- Only filed when company plans to make 20+ redundant at a single site<br>- Measures potential and not actual redundancies | Insecure Work | Publicly available |
| **Universal Credit Data** | 2013-present; monthly | Administrative dataset that logs the number universal credit claimants and is indicative of unemployment or low-income employment. This will be relevant for all themes in MWP as this dataset can be an indication of overall labour market health and buoyancy. | + Reliable administrative data<br>+ Good time coverage; monthly cadence<br>- Gradual phase of claimants moving to Universal Credit from tax credits and other previous allowances. Numbers should be interpreted with caution. | All themes | Publicly available |

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## 5.4 Value for Money (VfM) evaluation

This section sets out how an economic evaluation of the MWP programme can be undertaken. This includes identifying what questions an economic evaluation should seek to address and the most suitable approach to perform an economic assessment of the MWP programme.

### 5.4.1 VfM evaluation questions

The central focus of the MWP Value for Money assessment is understanding **the extent to which MWP represented value for money**. This question can be further broken down in the following four sub-questions:

13. Were public resources used economically in establishing and supporting the programme?
14. To what extent were outputs arising from the MWP programme delivered efficiently?
15. How effective was MWP in delivering its objectives so far?
16. To what extent did the benefits of MWP reach the workers and employers they were intended to reach?

### 5.4.2 VfM method: 4Es

As discussed in the previous chapter, the impact evaluation of the MWP programme will primarily involve Theory Based Methods, as such it will not be possible to precisely quantify the impacts of the MWP package of policies. The MWP programme is a complex, system-wide regulatory reforms involving several policies with many different outcomes (e.g. worker voice, fairness, health and wellbeing, employment relations), whose costs and benefits are difficult to monetise robustly. Therefore, rather than undertaking a full Cost Benefit Analysis, the evaluation will assess whether the programme delivered value through economy, efficiency, effectiveness and equity (i.e. 4Es framework). This approach will provide a structured assessment of the public value of MWP, rather than a monetised return-on-investment metric. The 4Es framework can synthesise both qualitative and quantitative evidence produced through the evaluation and, it is designed to assess the MWP programme against four dimensions:

1. **Economy:** The degree to which the cost of resources was minimised whilst having regard to quality and objectives. This will be informed by the outputs of a future process evaluation.
2. **Efficiency:** The extent to which outputs arising from MWP policies were delivered efficiently (i.e. at minimum cost, using minimum resources and without delay). This will be informed by the outputs of a future process evaluation.
3. **Effectiveness:** The extent to which outputs arising from MWP policies led to their intended outcomes, impacts and potentially offset adverse effects. This will primarily draw on the findings from the impact evaluation.
4. **Equity:** The extent to which and how differently outcomes reached all intended target groups. This would be informed by the outputs of the process evaluation, as well as some aspects of the impact evaluation (e.g. sub-group analysis).

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### 5.4.3 Key sources of information

Due to the specific nature of the MWP programme, encompassing multiple policies operating in six different thematic areas, we expect the 4Es assessment to draw on wide range of data and strands of a future evaluation of the MWP programme.

- **Administrative datasets:** Several key administrative datasets have been identified as the sources of relevant information for the 4Es assessment. These will include:
  - *Labour Force Survey:* Providing information on earnings distribution, contractual arrangements, working patterns and sickness absence
  - *Annual Survey of Hours and Earnings:* Including data on average and median weekly hours of work
  - *Understanding Society:* Providing information on job satisfaction, health and wellbeing, maternity leave and working arrangements
  - *MoJ Official Statistics:* Covering non-compliance cases filed at Employment Tribunals
  - *Business Structure Database:* Recording business' performance data such as employment and turnover
  - *Annual Business Survey:* Providing official metrics of productivity and GVA
  - *Fair Work Agency internal data:* Covering enforcement activities
- **Survey data:** Some aspects of the MWP programme can only be investigated through ad hoc surveys. These will be particularly suited to gather information on how employers and employees adapt to the new set of regulations. On the employer side, this will include knowing what costs they incur to comply with new contracts, dismissals arrangements, HR training and shifts' reorganisation. Quantitative surveys will also be necessary to understand, for example, the extent to which employers deployed family friendly policies. For employees, surveys will allow the evaluation to understand the extent to which they are aware of the new policies, and the extent to which they trust their employer.
- **Qualitative evidence:** Another source of evidence is represented by qualitative data collected through in depth-consultations with employers, employees and other stakeholders. They will help explain whether resources have been used efficiently, why implementation approaches have been more or less effective, identify unintended consequences, and understand how the costs and benefits of the reforms have been experienced across different sectors, employer types and workforce groups.

**Contextual information:** Finally, other publicly available sources such as the CAC Annual Report, Acas data, CIPD Good Work Index and Eurofound data will be used to gauge various insights including the: 1) change of the Trade Unions position, the extent to which employers engage with them, 2) whether employees are better represented and, finally 3) if UK business standards match international standards with respect to employment rights and workplace practices.

- **Cost data:** The main costs to consider in the context of the 4Es assessment fall into three categories:
  1. **Exchequer costs:**

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- Costs of establishing and running the enforcement system, including the FWA
- Additional demand on Employment Tribunals and Acas
- Public sector costs as an employer, including compliance with the reforms

2. **Costs to business:**

- Familiarisation and ongoing administrative costs across all reforms
- Costs arising from the right to guaranteed hours, payments for shifts cancelled or curtailed at short notice, the reduced qualifying period for unfair dismissal, and reforms to Statutory Sick Pay

3. **Wider costs to workers and the economy:**

- Any employment effects arising from changes to hiring behaviour
- Cost of employment for particular groups and types of contracts potentially leading to changes in workforce composition.

At the time of writing, costs and benefits have been estimated ex ante in the ERA 2025 economic analysis and supporting impact assessments. The VfM assessment should explicitly test these assumptions, for example on take-up of rights, familiarisation and implementation costs, the number of workers affected and behavioural responses, by comparing them with evaluation evidence as it becomes available. Where evidence diverges materially from IA assumptions, this should be reported and used to update future appraisal.

### 5.4.4 4Es Framework

Table 5.4 below maps the relevant "4Es" (Economy, Efficiency, Effectiveness and Equity) questions to the most suitable evidence for assessment that would inform the 4Es approach. Where possible the VfM framework should distinguish between: (i) Exchequer effects, including tax receipts, welfare expenditure and public-administration costs; (ii) costs and benefits to businesses; and (iii) wider costs and benefits to workers and society.

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**Table 5.4 Overview of value for money assessment**

| Evaluation Question | Evidence needed for assessment |
|---|---|
| **Economy** | |
| Were public resources used economically in establishing and supporting the programme? Sub-questions:<br>• What was the total cost of the MWP programme as a whole?<br>• Did the process for allocating funding support value for money?<br>• How far did the design and delivery of the programme – including any procurement of external support- reflect best practice?<br>• Were input costs in line with established norms and proportionate to the needs of the programme? | • Total public funding deployed to implement the MWP reforms<br>• Funding split into:<br>o Public sector implementation costs<br>o Employer compliance and adjustment costs<br>• Feedback from stakeholders' interviews |
| **Efficiency** | |
| To what extent were outputs arising from the MWP programme delivered efficiently? Sub-questions:<br>• Did implementation mechanisms function as expected?<br>• To what extent were the requirements of the legislation and associated communications clear to employers?<br>• Were outputs achieved within expected costs?<br>• Were outputs achieved as planned and within expected timelines?<br>• Were outputs in line with the expected targets?<br>• Were risks effectively identified, mitigated and managed? | • Efficiency of delivery of the MWP policies should be assessed using:<br>o Stakeholders' interviews<br>o Analysis of policies' Monitoring Information<br>o Surveys<br>o Secondary data sources |
| **Effectiveness** | |
| How effective was MWP in delivering its objectives? | • Number, and scale of change in intended outcomes provided through primary data collection and secondary data sources<br>• Benefits experienced by workers, employers and wider economy |
| **Equity** | |
| To what extent did the benefits of MWP reach the workers and employers they were intended to reach? Sub-questions:<br>• How were the impacts distributed by employer size and sector?<br>• How were the impacts distributed among employees disaggregated by sector and contract type? | • Number, and scale of change in outcomes, by beneficiary type (employers, employees) – provided through primary data collection, and secondary data sources. |

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## 5.5 Methodological strengths and limitations

The proposed evaluation approach has a number of important methodological strengths, but also several limitations that should be recognised when interpreting the findings. Its principal strengths lie in the use of an explicit programme-level ToC to provide a transparent basis for causal assessment, the integration of multiple quantitative and qualitative evidence sources, and a phased evaluation approach aligned with the maturity of available evidence. The framework also adopts contribution analysis to systematically examine alternative explanations and brings together process, impact and VfM evidence within a single evaluation framework.

At the same time, being explicit about the limitations of the proposed approach is consistent with good evaluation practice and helps ensure that conclusions about the programme's contribution remain proportionate to the available evidence. Where possible, the framework identifies practical strategies to mitigate these limitations and strengthen confidence in the findings.

### 5.5.1 Baseline availability and timing

While the proposed evaluation framework seeks to establish baseline measures as early as possible, many reforms will have already be implemented, or well underway by the time programme-level evaluation commences. This is particularly relevant for survey-based measures such as awareness, perceptions of fairness, workplace voice, trust in employers and understanding of rights, where pre-implementation data may not be available.

As a result, some baseline measures may reflect early implementation effects rather than a completely pre-reform position, or be based on retrospective questions which is a less robust approach. This limits the extent to which simple before-and-after comparisons can be used to measure the change over time. The framework proposes drawing on historical administrative and survey data where available, triangulating multiple evidence sources, and focusing on changes in trends and trajectories where baselines are not available.

### 5.5.2 Attribution and contribution

The MWP programme operates across the entire labour market and consists of multiple, overlapping reforms introduced over several years. In addition, labour market outcomes such as employment, productivity, earnings, wellbeing and inequality are influenced by a wide range of factors, including economic conditions, technological change, demographic shifts, wider government policy, and sector-specific developments.

As discussed (Section 5.3), it is not possible to isolate the effect of MWP through a single experimental or quasi-experimental design. The evaluation is therefore designed to assess contribution rather than direct attribution. While contribution analysis is a robust and recognised approach for evaluating complex policy programmes, findings will necessarily reflect the balance of evidence available and the plausibility of MWP's contribution alongside other influencing factors. Contribution analysis cannot eliminate uncertainty regarding causal relationships but instead seeks to reduce uncertainty by assembling and critically testing multiple sources of evidence.

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Three particular challenges should be recognised when applying this approach to MWP.

**First, impacts may differ substantially between groups.** MWP may generate benefits for some workers while producing adverse or unintended effects for others. For example, improvements in security and employment conditions for existing workers could potentially coincide with changes in recruitment behaviour or reduced employment opportunities for some prospective workers. Similar differences may arise across sectors, firm sizes and workforce groups. Programme-level findings should therefore not rely solely on average or aggregate effects. Where data allows, contribution claims should be examined separately for relevant worker, employer and sector groups, drawing on quantitative subgroup analysis alongside qualitative evidence to understand how and why experiences differ. Contribution Analysis can provide a framework for assessing these differentiated causal pathways, but the identification and estimation of distributional effects will depend on the underlying evidence available.

**Second, MWP may generate competing causal pathways affecting the same outcome.** For some outcomes, different reforms or behavioural responses may plausibly operate in opposing directions. Productivity, for example, could be supported through greater employment stability or employee motivation, while potentially being constrained in some settings through reduced flexibility in the allocation of labour. Similarly, reforms could have different and potentially opposing effects on employment or industrial relations. The evaluation should therefore avoid assuming a single direction of programme effect. It should test the evidence for the principal positive and negative causal pathways separately and consider their relative importance when reaching programme-level contribution claims. A limited change in an aggregate indicator may therefore coexist with significant programme effects operating in different directions or across different groups.

**Third, changes in high-level labour market outcomes may be driven predominantly by factors outside MWP.** Macroeconomic conditions, technological change and other policy reforms may have substantially greater effects on indicators such as employment, unemployment and productivity over the evaluation period. This makes simple before-and-after comparisons particularly unsuitable. The direction of change in a headline indicator should not, in itself, be interpreted as evidence of either positive or negative MWP impact: an outcome could deteriorate despite a positive contribution from MWP, or improve despite a negative contribution, depending on the underlying counterfactual trajectory.

To strengthen confidence in findings, the evaluation should draw on multiple sources of evidence, test alternative explanations, and assess whether observed changes are consistent with the programme's ToC and expected causal pathways. This should include explicit consideration of the most important competing explanations for observed changes, drawing on evidence on wider economic and policy developments, trends preceding and during implementation, reform-level evaluations and counterfactual estimates where available, and evidence on intermediate outcomes and mechanisms specified in the ToC. Where competing explanations cannot be adequately

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distinguished, conclusions should explicitly reflect this uncertainty rather than attributing observed changes to MWP.

Different evidence sources may provide inconsistent or conflicting accounts of programme performance. Rather than expecting complete consistency, the evaluation should explicitly assess the degree of convergence across evidence sources and explain how differing findings influence confidence in contribution claims. Conclusions should therefore distinguish between outcomes for which there is strong evidence of an MWP contribution and those for which the relative influence of MWP and wider factors remains uncertain.

### 5.5.3 Complexity and interacting reforms

The programme-level evaluation is designed to complement, rather than replace, individual policy evaluations. It adopts a top-down perspective that assesses whether the MWP programme as a whole has contributed to its strategic objectives, while drawing on bottom-up evidence from individual reforms to understand how change has occurred. This approach provides a richer understanding of programme performance but also requires the synthesis of evidence across multiple themes, reforms and causal pathways. As a result, programme-level conclusions will depend not on any single piece of evidence, but on the extent to which findings from different sources combine to support a coherent and plausible contribution story.

### 5.5.4 Variation in impacts

The impact of MWP is unlikely to be uniform across the economy. Certain sectors, including hospitality, retail, and health and social care, are expected to experience a greater concentration of reforms and therefore potentially larger effects. Similarly, impacts may vary substantially by region, company size, employee/worker characteristics and employment arrangements.

This creates challenges for programme-level evaluation because aggregate outcomes may obscure important differences between regions, sectors and different groups of employers and employees/workers. The framework therefore places considerable emphasis on disaggregation and targeted primary research within sectors and groups where impacts and unintended consequences are expected to be most pronounced.

In particular, the smallest employers may present a particular challenge for evaluation. Employment relationships within micro-businesses can be more informal than in large organisations and may be shaped as much by personal relationships and local working practices as by formal policies and procedures. These factors may make it more difficult to identify how reforms are being implemented and experienced within small firms. There is also a possibility that some businesses respond to regulatory change by reducing headcount, relying more heavily on self-employed contractors or agency workers, or choosing not to recruit additional staff. While the proposed research includes employers of different sizes, capturing the full range of small business responses may remain challenging.

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### 5.5.5 Evidence availability and maturity

The evidence base underlying individual policy reforms varies considerably. Some reforms are supported by extensive international and national evidence, while others involve relatively novel institutional or behavioural changes for which direct evidence is more limited. In addition, some intended outcomes, particularly those relating to workplace culture, voice, fairness and wellbeing, may take several years to emerge and can be difficult to measure consistently.

The phased evaluation approach is designed to address some of these limitations by aligning evidence collection with expected implementation and outcome timelines. Nevertheless, early findings should be interpreted as indicators of progress rather than definitive evidence of long-term impact. Confidence in contribution claims should increase progressively as multiple waves of evidence become available and longer-term outcomes emerge. Monitoring indicators should not be interpreted in isolation but triangulated with other quantitative and qualitative evidence to understand the factors driving observed changes. This is particularly important for enforcement indicators, which may reflect changes in enforcement capacity, targeting, reporting behaviour, operational processes or the use of new technologies and data analytics, as well as underlying changes in employer compliance. Enforcement metrics should therefore be interpreted alongside wider evidence on employer behaviour and compliance, employee awareness and reporting, and the operation of the enforcement system.

### 5.5.6 Economic valuation

A number of the programme's intended benefits, including improvements in job quality, workplace fairness, employee voice and wellbeing, are difficult to express in monetary terms using established valuation techniques. Conversely, many employer costs, compliance costs and administrative burdens are more readily quantified. As a result, the economic evaluation is likely to provide a more complete assessment of costs than benefits. The proposed 4Es framework is intended to address this imbalance by combining quantitative evidence with broader assessments of effectiveness, equity and implementation rather than relying solely on monetised outcomes.

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# 6 Phased Evaluation Timeline

The MWP programme comprises a large number of reforms implemented over several years, with different themes operating through distinct causal pathways and expected to generate outcomes over varying timescales. While some reforms are expected to lead to immediate changes in awareness, compliance and behaviour, others seek to influence workplace culture, employment relationships and labour market dynamics, which may take substantially longer to materialise. The phased implementation of reforms from 2025 further means that outcomes and impacts will not emerge simultaneously across the programme.

For these reasons, the evaluation of MWP should adopt a phased approach. This recognises both the practical realities of implementation, and the evidence needs of policymakers over time. Early phases of the evaluation should focus on implementation readiness, including the establishment and capability of the enforcement system, awareness of new rights and routes to redress, employer compliance, and whether the mechanisms through which reforms are expected to operate have become active. Given the central role of enforcement across the programme, the readiness and performance of the enforcement system should be treated as a leading indicator for the successful implementation of all themes. Later phases should progressively assess whether these mechanisms have translated into intended outcomes and, ultimately, whether the programme has contributed to its overarching objectives of improving job quality, raising living standards, supporting labour market participation and contributing to economic growth.

The timeline set out below is intended to provide an indicative framework for sequencing evaluation activities and evidence collection. It accounts for the evaluation questions that can realistically be addressed at different stages of programme maturity, the types of evidence that should be prioritised, and the points at which more robust assessments of contribution become feasible. The timings should be viewed as indicative and may require adaptation as reforms are implemented, further evidence becomes available, and policy priorities evolve. The end of each phase provides an opportunity to review progress, identify any changes needed to improve delivery of the MWP programme, and adapt subsequent phases of the evaluation to ensure they continue to meet evolving policy needs.

## 6.1 Phase 1 (Years 1-2): Early implementation and emerging outcomes

Policy-level evidence expected to be available: Limited or none.

**Task:** Agree with Government departments what can be shared and when; establish the mechanism for sharing evidence.

The primary purpose of Phase 1 (2027-2028) is not to determine whether MWP has improved labour market outcomes, but to establish whether the conditions necessary for those outcomes are emerging. The emphasis should therefore be on process evaluation and early theory testing: assessing whether reforms are being implemented as intended, whether employers and workers

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understand the new framework, whether enforcement arrangements are operating effectively, and whether the behavioural mechanisms identified in the programme ToC are beginning to activate. Phase 1 will also offer the opportunity to validate the initial systems map, identify key dependencies and implementation bottlenecks. This should assess how reforms are being implemented across government and delivery bodies, employers' understanding of and response to new requirements, workers' awareness and uptake of new rights, and the effectiveness of supporting infrastructure such as guidance, communications and enforcement mechanisms. Particular attention should be paid to the role of enforcement as a critical enabling condition underpinning the success of the wider programme.

Given that enforcement underpins all MWP reforms, early evaluation should pay particular attention to the readiness and performance of the enforcement system. This provides an early indication of whether new employment rights are likely to translate into changes in employer behaviour and worker outcomes (Table 6.1).

**Table 6.1: Cross-cutting implementation and enforcement**

| Monitor | Illustrative indicators | Why it matters |
|---|---|---|
| FWA readiness | Operational status, staffing, inspections, guidance published | Determines whether enforcement capability is in place |
| ET capacity | Caseloads, waiting times, backlog, disposition times | Indicates whether workers have effective access to redress |
| Acas activity | Advice requests, conciliations, guidance usage | Early indicator of awareness and dispute resolution |
| Employer implementation | Awareness of reforms, policy updates, HR processes, record keeping | Shows whether employers are preparing to comply |
| Worker awareness | Awareness of new rights and routes to redress | Necessary precondition for exercising rights |
| Compliance and enforcement activity | Inspections, notices, penalties, recoveries, complaints | Indicates whether new rights are being actively enforced |

Source: Authors' elaboration, 2026.

Alongside implementation evidence, Phase 1 should assess whether the programme's key mechanisms of change are becoming established. These include:

- awareness and understanding of new rights among employers and workers;
- employer compliance with new legal duties;
- uptake of new rights and entitlements by workers;
- employer behavioural responses, including changes to recruitment, workforce planning, HR policies, absence management, contractual arrangements and employee engagement;
- effectiveness of enforcement, guidance and communications in supporting compliance.

These indicators should be treated as leading indicators of future programme outcomes. By contrast, broader impacts such as productivity, economic growth, labour market participation and workforce stability are unlikely to be observable within Phase 1 and should not be interpreted as measures of programme success at this stage. These indicators should function as an early warning

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system for implementation, enabling HMG to identify delivery risks, unintended employer responses, or weaknesses in awareness, compliance or enforcement sufficiently early to inform implementation and policy refinement.

Phase 1 should prioritise establishing robust baselines, where possible, and evidence infrastructure for future evaluation. This includes confirming data availability, implementing any required primary data collection, establishing repeated measurement where necessary, and developing sectoral evidence for priority sectors, such as social care, hospitality and retail and across regions.

In addition to implementation fidelity, Phase 1 should examine the efficiency of implementation, the effectiveness of governance and coordination arrangements across government and delivery bodies, and the extent to which reforms are interacting as anticipated within the programme theory. The phase should also assess how implementation experiences vary across sectors, employer sizes, worker groups and employment arrangements, and consider the influence of wider policy, economic and labour market conditions on programme delivery.

The key output from this phase should be an early implementation and mechanism assessment to be completed in 2028. This should provide evidence on whether reforms are being delivered as intended, whether the underlying mechanisms of change are being activated (including employer and employee awareness, compliance and behavioural responses), and whether any early risks, barriers or unintended consequences require policy attention. The assessment should establish whether the preconditions for longer-term outcomes are being put in place, providing the foundation for more substantive contribution assessments in subsequent phases. This output should also cover what lessons have been learned that could inform and improve the implementation of MWP reforms that are yet to be delivered.

## 6.2 Phase 2 (Years 3-4): Outcome consolidation and contribution assessment

**Policy-level evidence expected to be available:** As established in Phase 1, accounting for any delays and updates.

**Task:** Initial synthesis - policy-level evaluation findings and conclusions feed into contribution claims.

By Phase 2 (2029-2030), the majority of reforms within the MWP programme are expected to have been implemented and operating for a sufficient period of time for intended outcomes to begin emerging. While some implementation and compliance monitoring should continue particularly for those policies implemented later, and enforcement monitoring will continue, the primary focus of the evaluation should shift towards assessing whether the outcomes anticipated within the programme and theme-level ToC are materialising, and the extent to which there is evidence that MWP has contributed to these changes. Emerging evidence should be used to update the systems map to revise initial interactions and feedback loops.

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The evidence generated during this phase should support decisions about whether implementation or policy design requires further refinement, while providing an interim assessment of the strength of evidence that MWP is contributing to its intended outcomes. The central objective of this phase is to assess whether employers have adopted and embedded the changes required by MWP, if workers have started to exercise their new rights and whether expected theme-level outcomes are being achieved. This includes examining whether reforms are contributing to improvements in job quality, equality in the workplace, workers' health and wellbeing, work-life balance, and company standards. Given the complexity of the programme and the absence of a credible counterfactual at programme level, the emphasis should be on building and testing contribution claims through systematic assessment of the evidence against the programme ToC, **and assessing the strength of evidence and level of confidence associated with those claims**, rather than attempting to establish direct attribution.

Contribution analysis should become the primary analytical approach during this phase. Building on evidence collected during Phase 1, the evaluation should assess whether the causal pathways identified in the programme and theme-level logic models are operating as expected and whether observed outcomes are consistent with the anticipated effects of the reforms. This should include consideration of alternative explanations and wider contextual factors, such as economic conditions, labour market developments and other policy changes, that may also influence observed outcomes. Particular attention should be given to the extent to which enforcement has underpinned the success of the programme alongside any identified interactions between reforms including, where outcomes may be reinforced, enabled or constrained by reforms operating in other themes.

This phase should also generate a more comprehensive understanding of the benefits and costs experienced by employers and employees. For workers, benefits may include improved pay, greater job security, enhanced working conditions, improved wellbeing, stronger workplace voice and increased perceptions of fairness. For employers, benefits may include improved retention, reduced turnover, greater workforce stability and improvements in organisational culture and employee engagement. At the same time, the evaluation should assess costs associated with implementation, compliance and ongoing administration, alongside any wider operational impacts experienced by businesses. Understanding how these benefits and costs vary across sectors, regions, company sizes, workforce groups and employment arrangements will be critical to understanding how the programme is affecting different parts of the labour market.

A further priority during Phase 2 is the assessment of unintended consequences. By this stage, sufficient time should have elapsed for early behavioural responses identified during Phase 1 to either dissipate or become established patterns. The evaluation should therefore examine whether unintended consequences have emerged, their scale and persistence, and whether they are concentrated within particular sectors, worker groups or business types. Particular attention should be paid to outcomes identified through the systems mapping exercise, including changes to recruitment practices, labour mobility, workforce composition, contractual arrangements and employer responses to increased regulatory requirements.

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The principal output from this phase should be an interim contribution assessment to be completed in 2030. This should synthesise evidence across themes and sectors to assess the extent to which MWP is contributing to intended outcomes, examine how these outcomes differ across sectors, regions, employer types and workforce groups (including relevant protected characteristics where data permit), identify the strongest and weakest areas of evidence, and provide an assessment of the benefits, costs and unintended consequences emerging across the programme. The findings should inform both future policy development and the design of the final phase of evaluation, which will focus on assessing longer-term and system-level impacts that require additional time to materialise.

## 6.3 Phase 3 (Years 5+): Long-term impacts and system change

Policy-level evidence expected to be available: As established in Phase 1 and 2.

**Task:** Final synthesis - policy-level evaluation findings and conclusions are consolidated and inform final contribution claims.

The evidence generated during this phase should support an overall judgement about the programme's contribution and value for money, while identifying lessons for the design of future labour market policy. Phase 3 (2031+) should focus on assessing whether the outcomes identified in earlier phases have been sustained and whether they have translated into the longer-term impacts anticipated by the MWP programme. By this stage, sufficient time should have elapsed for reforms that rely on longer-term behavioural, organisational and cultural change to have become embedded, allowing for a more complete assessment of programme contribution.

Building on the contribution assessments undertaken in Phase 2, the evaluation should revisit the programme-level ToC and assess whether there is evidence that MWP has contributed to broader and more sustained improvements in labour market outcomes. This may include assessing whether improvements in job quality, workplace equality, worker wellbeing, work-life balance and company standards have been maintained over time and whether these changes have contributed to wider labour market objectives, such as increased labour market participation, reduced insecurity and improved workforce stability. The final systems map should be used alongside contribution analysis to explain how programme-level impacts emerged and how different reforms combined to produce them.

This phase should also provide an opportunity to assess the persistence of any benefits, costs and unintended consequences identified in earlier phases. Particular attention should be paid to whether initial implementation challenges or unintended effects have diminished over time, become embedded within the labour market, or generated additional downstream consequences that were not apparent during earlier stages of the evaluation. Phase 3 provides the strongest opportunity to undertake a value for money assessment. Drawing on evidence collected throughout the evaluation period, the assessment should consider the economy, efficiency, effectiveness and equity of the programme. This should include examining whether resources were deployed appropriately to support implementation, how efficiently reforms were delivered and adopted, the

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extent to which intended outcomes and impacts were achieved, and how benefits and costs were distributed across different sectors, employer sizes and workforce groups.

The principal output from this phase should be a final programme-level contribution assessment. This should synthesise evidence collected throughout the evaluation period to provide an overall assessment of the extent to which MWP has contributed to its intended outcomes and impacts, identify the factors that supported or constrained success, and draw lessons for the design and implementation of future labour market reforms.

**Table 6.2: Evidence maturity framework**

| Evaluation focus | Phase 1 (Years 1-2) 2027-2028 | Phase 2 (Years 3-4) 2029-2030 | Phase 3 (Years 5+) 2031+ |
|---|---|---|---|
| **Implementation** | ●●● | ● | ○ |
| **Awareness and uptake** | ●●● | ●● | ○ |
| **Employer compliance** | ●●● | ●● | ● |
| **Theme-level outcomes** | ● | ●●● | ●● |
| **Cross-theme interactions** | ○ | ●●● | ●● |
| **Programme contribution** | ○ | ●● | ●●● |
| **Long-term impacts** | ○ | ● | ●●● |
| **Value for money** | ○ | ● | ●●● |

Source: Authors' elaboration, 2026.
Note: ○ Emerging evidence; ● Moderate evidence; ●● Strong evidence; ●●● Mature evidence base.

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# Appendix 1: Full set of MWP reforms

Table 6.3 shows not only the reforms that have been studied for this M&E framework which relate to the ERA but also those in the **broader plan with MWP (shown in bold),** though there is less certainty regarding when these reforms will materialise.

**Table 6.3: Full set of MWP reforms**

| Themes | | | | | |
|---|---|---|---|---|---|
| Family Friendly Rights | Fair Pay | Insecure Work | Equality at Work | Enforcing Rights at Work | Voice at Work |
| **Policies** | | | | | |
| • Making flexible working the default<br>• New right to unpaid bereavement leave<br>• Day 1 right to protected time off work to grieve a pregnancy loss before 24 weeks<br>• Day 1 right to paternity leave and unpaid parental leave<br><br>• ***Carers & parental leave reviews***<br>• ***Right to switch off***<br>• ***Workplace surveillance technologies*** | • Improve access to Statutory Sick Pay by removing the Lower Earnings Limit and waiting period<br>• Strengthen existing tipping law<br>• Establish a Fair Pay Agreements process in the social care sector<br><br>• ***Genuine National Living Wage (NLW)***<br>• ***Remove age bands from NLW***<br>• ***Ban unpaid internships***<br>• ***Paid travel time*** | • Reforming zero hours and similar contracts through new rights to guaranteed hours, reasonable notice of shifts, and payment for shifts cancelled, curtailed or moved at short notice<br>• Extending protections against unfair dismissal<br>• Strengthening collective redundancy rights<br>• Strengthening protections against fire and hire practices<br><br>• ***TUPE***<br>• ***Strengthen protections for self-employed*** | • Requiring large employers to publish Equality Action Plans<br>• Whistle-blowing protections against sexual harassment<br>• Requiring employers to take all reasonable steps to prevent sexual harassment of their employees<br>• Requiring employers to not permit the harassment of their employees by third parties<br><br>• ***Menopause guidance*** | • Establish the Fair Work Agency (FWA)<br>• Employment Tribunal (ET) time limits<br><br>• ***Raising collective grievances to Acas***<br>• ***Safer workplaces – modernising guidance***<br>• ***Safer workplaces – wellbeing and health*** | • Strengthening workers' rights to trade union access, recognition and representation<br>• Repeal Strikes (Minimum Service Levels) Act 2023<br>• Repeal Trade Union Act 2016<br>• Creating a modern framework for industrial relations<br><br>• ***Electronic balloting*** |

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- ***Consult on reform of the employment status framework***

- ***Equal pay – enforcement and comparators***
- ***Terminal illness***
- ***Socioeconomic duty***
- ***Public Sector Equality Duty & Equality IAs***
- ***Neurodiversity awareness***

Source: Authors' elaboration, 2026.

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# Appendix 3: Data sources and measurement considerations by theme

The sections below present the detailed indicator frameworks for each of the six MWP themes as well as at the programme level. Across all themes, a fundamental challenge for the evaluation is attribution. The reforms are economy-wide in scope and will be implemented against a backdrop of broader labour market change. Meaning that other factors, including macroeconomic conditions, sectoral trends, employer responses, and parallel policy interventions, will all shape the outcomes the evaluation is trying to measure.

## Programme Level Indicator Set

At the programme level, indicators are tracked through a combination of large-scale secondary datasets – principally the Labour Force Survey (LFS), Annual Survey of Hours and Earnings (ASHE) and Understanding Society (USoc) - alongside primary data collection. Key short and medium-term signals include trends in earnings distributions, employment tribunal volumes, union membership rates, and employee perceptions of fairness and job quality. These will provide early evidence on whether the reforms are gaining traction before longer-term impacts become detectable.

The MWP programme is expected to have broad economic and social impacts: improved employee health and wellbeing, narrowed inequality, reduced economic inactivity, higher productivity, and better financial security for workers. These can be tracked through indicators such as the P90:P10 wage ratio and Gini coefficient from ASHE, employment rates for disadvantaged groups from the LFS, labour productivity from ONS National Productivity Statistics, and wellbeing measures from Understanding Society. However given the complexity of the causal chain and the number of intervening factors, these impact-level indicators cannot be meaningfully attributed to the MWP programme alone.

Finally common to all six themes is the role of knowledge transfer. This is the process by which awareness and understanding of new rights and obligations flow from government and guidance bodies through to employers or workers, before any downstream outcomes can be realised. Measuring whether this transfer is happening could happen through employer awareness surveys, employee surveys, Acas helpline data and depth interviews. This measurement forms an important early layer of evidence across the entire evaluation, and weak signals at this stage would be an important warning that later outcomes may not materialise as intended.

## Fair Pay

For the Fair Pay theme, ASHE will be the primary source for tracking earnings distributions, with analysis focused on lower percentiles in adult social care, retail and hospitality. This will contribute to the evaluation of the Adult Social Care Fair Pay Agreement but will not be used in isolation. A robust, comprehensive evaluation will be undertaken for the Adult Social Care Fair Pay Agreement.

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Material changes in ASHE earnings data as a result of the Adult Social Care Fair Pay Agreement would not be detected until after it comes into effect in 2028.

Statutory Sick Pay presents a distinct measurement challenge in that no direct administrative data source captures take-up. The DWP Survey of Employees and Self-Employed Workers provides the closest available proxy, covering sick pay receipt, presenteeism rates and disparities between low and higher-income workers, and will serve as the primary baseline source for this reform.

The extent to which tipping reforms will translate into improved outcomes for workers is a nuanced question. Tips can form a significant and variable part of take-home pay in hospitality and similar sectors, with direct implications for financial security and income predictability. Presently there is little existing administrative or survey source that can captures this adequately. Instead primary research through employer surveys and depth interviews with workers in affected sectors is the most appropriate means of tracking the tipping reforms.

## Insecure Work

The Insecure Work will strengthen employment protections and provide greater security and stability for workers. This means the measurement framework needs to capture outcomes across the full spectrum of employment arrangements, including the most fragmented and precarious, where union representation is typically weakest and where the reforms are most likely to have their greatest effect.

The LFS is the primary source for tracking changes in contract type, hours worked and earnings across worker groups, with particular focus on those in retail, hospitality and social care where zero hours contracts and variable hours arrangements are most prevalent. Job satisfaction, job security perceptions and anxiety indicators from Understanding Society and the LFS will be used to monitor whether workers in insecure sectors report improvements in their day-to-day experience of work over time.

Attribution will be a persistent challenge across this theme. Employment levels, contract type distributions and earnings in the sectors most affected by these reforms are sensitive to wider economic conditions, consumer demand and employer cost pressures, all of which will be shifting independently of the legislation. In addition, the risk of displacement (employers substituting towards agency workers, self-employed contractors or other arrangements to circumvent new obligations) will need to be monitored through trends in agency work and self-employment in affected sectors. Both variables (agency work and self-employment) are available in LFS and changes can be observed but not attributed to MWP. However, the risk of displacement would need to be estimated based on survey data.

Qualitative and primary research methods will therefore play an important complementary role. Depth interviews with workers in insecure sectors, alongside employer surveys, will be needed to understand how new rights are experienced in practice.

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## Equality at Work

The Equality at Work theme relies heavily on primary data collection given the focus on shifts in employees feelings. The LFS, ASHE and USoc enable tracking of high-level outcomes such as changes in job quality, pay distributions, job satisfaction and work-related wellbeing for women and other groups protected under the Equality Act. The Crime Survey for England and Wales (CSEW) and other ONS victimisation statistics contribute measures of workplace harassment, while ETs and Acas data provide counts of discrimination and harassment claims. However, many of the outcomes in this theme such as normalisation of menopause are not directly visible in these secondary sources and will require targeted primary research.

Equality-related outcomes and cultural change are typically slow-moving, and any observable changes will also be shaped by broader macroeconomic conditions, and parallel reforms such as those in Enforcing Rights at Work and Voice at Work. Complaint and claim data are particularly hard to interpret. Increases may initially reflect better awareness and confidence rather than worsening behaviour, so trends must be triangulated with evidence on earlier resolution and improving perceptions of fairness and trust.

Given these limitations, qualitative and primary research is critical. Depth interviews with HR, legal teams, managers and employees (especially women, those experiencing menopause and high-risk settings) and employer surveys will assess understanding of the new duties, operationalisation of prevention, creation of channels and spaces, and perceived protection. For the action-plan pathway, the gender pay gap reporting service will identify which firms produce plans and their basic content, but will not be able to examine the extent to which they are implemented. Assessing real impact will therefore rely on case studies and employee surveys on awareness and perceived change.

## Voice at Work

The Voice at Work evaluation draws on a core set of secondary sources. The LFS provides the primary source for tracking trade union membership density, disaggregated by sector, occupation, firm size and contract type, while ASHE enables monitoring of the union wage premium and pay distribution over time. Understanding Society contributes measures of worker autonomy, perceived voice, job satisfaction and wellbeing that are not captured in administrative data.

However national-level changes in union membership are slow-moving and unlikely to become detectable in survey data within the first two to three years of implementation, even where reforms are having a genuine effect. The theme-specific sources such as the CAC Annual Report, ONS Labour Disputes Statistics, and Certification Officer data, provide more direct windows onto the trade union mechanisms the reforms are intended to activate. Recognition applications and their outcomes indicate whether employers are becoming more willing to engage with unions voluntarily, while dispute statistics track trends in stoppages, working days lost and ballot activity.

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A more fundamental measurement challenge concerns the interpretation of labour dispute data. The reforms operate in part by restoring the credibility of the strike threat, with the expectation that stronger bargaining leverage encourages earlier employer engagement and reduces the likelihood of disputes escalating. If this mechanism functions as intended the bargaining dynamics of employee and employer are altered to be more cooperative and less disruptive. However, an initial rise in dispute activity following the repeal of the Trade Union Act 2016 thresholds should not be automatically interpreted as a negative signal as bargaining dynamics take time to settle. Distinguishing between these interpretations requires evidence on whether disputes are being resolved at earlier stages, whether voluntary recognition is increasing, and whether employer-union relationships are becoming more cooperative over time.

Given these limitations, qualitative and primary data sources carry particular weight. Depth interviews with HR leads, senior union representatives and Acas conciliators will be essential for assessing whether bargaining dynamics are genuinely shifting. The Acas statistical bulletin with trends in collective conciliation cases and resolution rates provides a useful early signal of whether disputes are being contained before escalation but should be read alongside CAC data and qualitative evidence. Gaps in systematic data on informal dispute resolution and early problem-solving represent a known evidence gap that the evaluation will need to address through primary research.

## Family Friendly Rights

The Family Friendly Rights theme encompasses a set of reforms with relatively specific objectives. These include extending bereavement leave, strengthening protections against dismissal for pregnant workers and new mothers, introducing day one rights to paternity and unpaid parental leave, and making flexible working the default. The reforms target identifiable groups and produce measurable behavioural changes, such as leave take-up or flexible working requesting. This means the measurement framework is more tractable than for some other themes. The core secondary sources are the LFS and Understanding Society, which together provide indicators on employment rates among mothers, flexible working take-up, job satisfaction and work-life balance.

A number of data limitations nonetheless apply. Employment Tribunal and Acas data on pregnancy and maternity discrimination claims captures only those instances that result in formal action and is known to understate the true prevalence of dismissal and detriment given well-documented barriers to reporting. More broadly, research on the impacts of maternity and paternity leave on economic outcomes such as retention and pay progression is limited, with most existing studies focused on health impacts rather than labour market outcomes.

A specific measurement challenge for this theme concerns the role of unpaid leave. Both bereavement leave and parental leave are introduced as unpaid rights. However, there are questions on the extent of take-up of these rights particularly for lower-income workers who have significant financial barriers. This has direct implications for measurement: take-up rates alone will not be able to observe workers who are unaware of their rights, those who are aware but financially unable to

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exercise them, and those who choose not to. Disentangling these effects will require bespoke primary research with employees, and employer surveys to capture how organisations are communicating new rights and absorbing associated administrative costs.

The timing dimension also requires careful handling in this theme. Evidence suggests that flexible working reforms may produce differing outcomes at different points. For example, an initial rise in Employment Tribunal and Acas claims is expected as awareness of new rights increases before self-compliance improves. The evaluation will therefore need to be designed with sufficient length and avoid drawing conclusions prematurely on the basis of early data that may not reflect the longer-run picture.

## Enforcing Rights at Work

The enforcement theme is concerned primarily with the functioning of the new Fair Work Agency (FWA). The foundational data sources for this theme are therefore largely administrative rather than survey based. Existing enforcement data from HMRC on NMW cases, arrears recovered and penalties issued provides the most robust baseline currently available, supplemented by Employment Tribunal statistics on receipts, disposals and open caseload published quarterly by the Ministry of Justice. Establishing credible baselines from these sources early in the implementation period is a priority, given that the ERA introduces a suite of simultaneous and interconnected changes that alter statutory rights, employer obligations and worker incentives simultaneously, making pre-post comparison inherently complex.

Once the FWA becomes operational, its own administrative data will become the primary source for tracking enforcement activity over time. This could cover investigations opened, warning letters issued, prosecutions, enforcement orders and arrears recovered. However, this data does not yet exist, and its scope, quality and publication frequency will depend on the reporting framework the FWA establishes.

Primary research with FWA staff, as well as staff from predecessor bodies, will be essential for assessing whether consolidation into a single agency has delivered the expected efficiency gains and improved data sharing across enforcement functions. Employer and worker surveys will similarly be needed to assess awareness of the FWA and perceptions of the clarity and accessibility of the enforcement system, neither of which can be captured through administrative data alone. The evaluation should anticipate this and build in flexibility to refine indicators as the agency's reporting framework develops.

Finally, Employment Tribunal (ET) statistics will also be used for the evaluation of the Enforcement theme as well as multiple themes. ET receipts data, published quarterly by the Ministry of Justice, will be used to track volumes and types of claims, and the extension of time limits from three to six months from October 2026 is expected to drive an initial increase in claim volumes that should not be interpreted as evidence of worsening compliance. Equally, the existing ET backlog means that changes in receipts data will mean that care will be needed to distinguish between trends driven by the reforms themselves and those reflecting wider changes in capacity and processing times.

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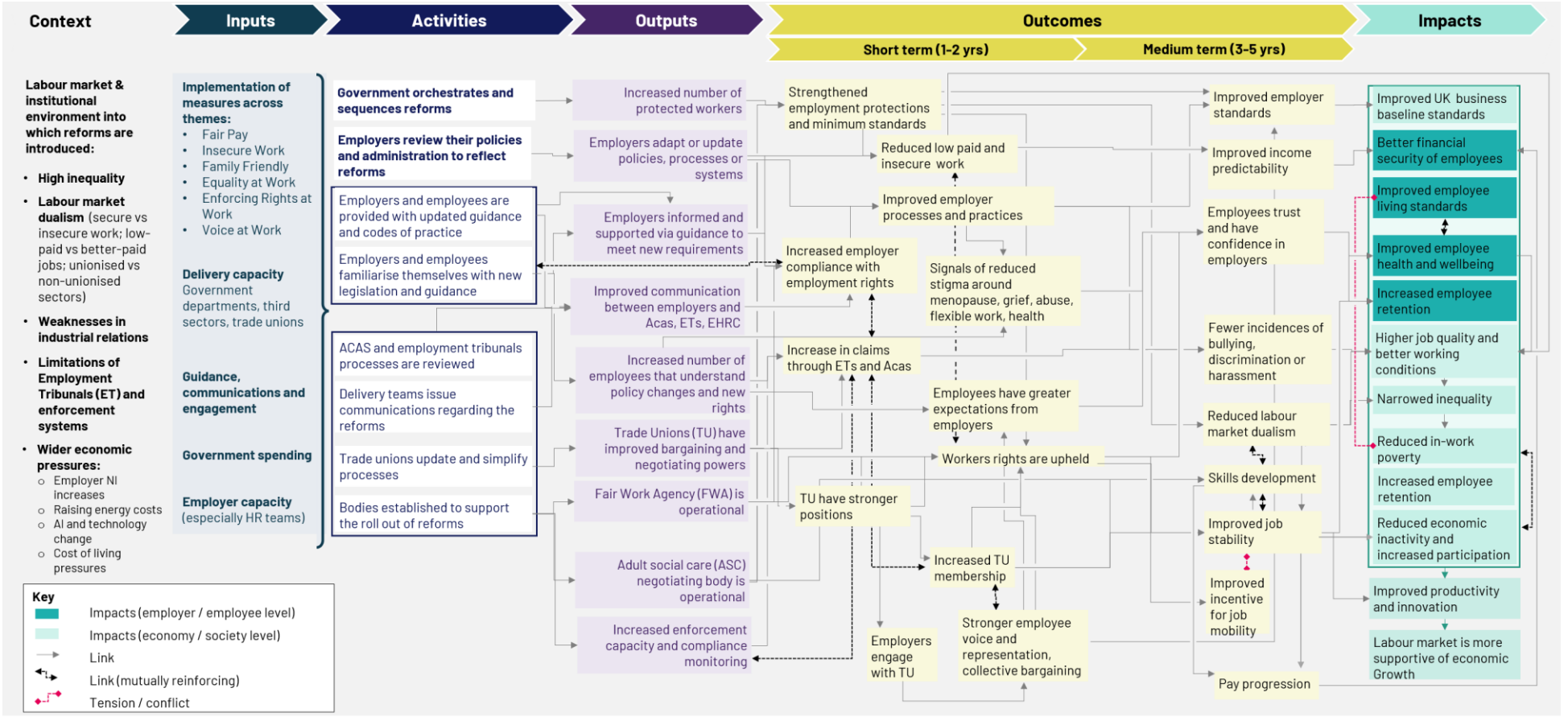
# Appendix 4: Detailed programme-level ToC




**Assumptions :**

- Employers have capacity to adapt
- Employers comply with new standards and obligations
- Workers feel able to exercise their rights
- Legislation and policy remains politically supported; the legislation is implemented consistently

**Barriers**

- Limited awareness leads to limited uptake
- Enforcement challenges mean employers do not implement changes as they are not held to account

**Employer adaptation and Unintended consequences:**

• Increased costs may lead to job losses or reduced hiring in some sectors; • Some employers may reduce hours or circumvent responsibilities leading to legal (moving to self-employment) and illegal (non-compliance) solutions ; • Increased administrative burden for small and medium businesses; • Regional disparities in implementation and outcomes; • Disparities in implementation and outcomes between sectors and employer type; • Businesses may adopt alternative business models that create other forms of insecure work; • Employer resistance to reforms; • Potential widening of differences between sectors if benefits were to mainly occur in already unionised workplaces; •Costs are transferred to workers through wages or T&Cs and reduced labour market dynamism (slower hiring/reallocation);• Risks may be higher for certain sectors or weaker labour markets

Source: Authors' elaboration, 2026.

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# Appendix 5: Draft evaluation matrix

**Table 6.4: Evaluation matrix**

| Strand | Evaluation question | Primary methods | Main data sources | Timing/Phase | Assessment focus |
|---|---|---|---|---|---|
| **Process** | How effectively has MWP been implemented as a programme? | Process evaluation, stakeholder interviews, employer and worker surveys, synthesis of reform-level evaluations | Reform-level evaluations, implementation documentation, employer and worker surveys, stakeholder interviews | Phase 1 (Years 1-2) | Implementation progress, fidelity, sequencing, barriers and facilitators |
| **Process** | To what extent has implementation occurred as planned, including the sequencing and timing of reforms? | Document review, stakeholder interviews | Programme documentation, implementation plans, monitoring information | Phase 1 | Delivery against intended timelines |
| **Process** | To what extent, and how, have communications, guidance and engagement activities supported implementation? | Employer and worker surveys, stakeholder interviews | Survey data, stakeholder evidence | Phase 1 | Reach, understanding and usefulness of communications |
| **Process** | What barriers and facilitators have influenced implementation? | Stakeholder interviews, employer interviews, case studies | Qualitative evidence, process monitoring | Phase 1 | Factors supporting or constraining delivery |
| **Process** | What unintended consequences or emerging risks have arisen during implementation, and what, if any, adaptations have been made in response? | Stakeholder interviews, employer interviews, case studies | Qualitative evidence, process monitoring | Phase 1-2 | Understand the breadth of impacts during implementation, lessons for future and improved implementation |
| **Process** | To what extent have Government coordinated the implementation of MWP with delivery bodies and other stakeholders? | Stakeholder interviews, documentary review | Interview evidence, delivery documentation | Phase 1 | Effectiveness of governance and coordination arrangements |
| **Process** | Whom did Government coordinate with and what value did these collaborations bring? | Stakeholder interviews | Interview evidence | Phase 1 | Contribution of collaborative arrangements |
| **Process** | Were any processes particularly efficient or inefficient? | Stakeholder interviews | Interview evidence | Phase 1 | Lessons for future implementation |
| **Process** | To what extent are employers and workers aware of and understand their new obligations and rights? | Employer survey, worker survey, interviews | Survey evidence, qualitative research | Phase 1 | Awareness, understanding and preparedness |
| **Process** | How is understanding related to behavioural changes? | Surveys, interviews | Employer and worker evidence | Phase 1-2 | Relationship between awareness and action |

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| | | | | | |
|---|---|---|---|---|---|
| **Process** | To what extent are employers able to implement multiple reforms across MWP? | Employer surveys, employer interviews | Survey data, case studies | Phase 1 | Organisational capacity and readiness |
| **Process** | How have business practices had to change to accommodate MWP? | Employer interviews and surveys | Employer evidence | Phase 1-2 | Adaptation and implementation behaviours |
| **Process** | How have employees been informed about their new rights, and have they started acting on them? | Worker surveys and interviews | Worker evidence | Phase 1-2 | Awareness and early exercise of rights |
| **Process** | How have stakeholder perceptions of the MWP reforms influenced implementation and compliance? | Interviews and surveys | Stakeholder, employer and worker evidence | Phase 1-2 | Interaction with the package of reforms |
| **Process** | How does awareness and understanding vary by region, sector, company size, employee/worker characteristics and employment arrangements? | Survey analysis | Employer and worker surveys | Phase 1-2 | Distributional differences in implementation |
| **Process** | How do wider policy, economic and labour market developments influence implementation of MWP? | Stakeholder interviews, contextual analysis | Policy documentation, stakeholder evidence | Phase 1-2 | External influences on implementation |
| **Impact** | To what extent has MWP contributed to its intended outcomes and impacts? | Contribution analysis, mixed-methods synthesis | Surveys, administrative data, reform-level evaluations, qualitative evidence | Phase 2-3 (Years 3+) | Overall programme contribution |
| **Impact** | To what extent have the expected outcomes and impacts within each MWP theme been achieved, and what factors enabled or constrained their achievement? | Contribution analysis, thematic synthesis | Theme monitoring data, surveys, qualitative research | Phase 2-3 | Theme-level outcomes and drivers |
| **Impact** | How have interactions between MWP reforms influenced the programme's contribution to intended outcomes and impacts? | Systems analysis, contribution analysis | Cross-theme evidence, qualitative research, administrative data | Phase 2-3 | Cross-theme interactions and mechanisms |
| **Impact** | To what extent and how has business and employee behaviour changed in response to the reforms? | Surveys, interviews, case studies | Employer and worker evidence | Phase 2-3 | Behavioural change |
| **Impact** | What costs and benefits have employers and employees experienced as a result of the overall programme, and how do these differ by region, sector, company size, employee/worker characteristics and employment arrangements? | Surveys, case studies, secondary data analysis | Employer and worker surveys, administrative datasets | Phase 2-3 | Distribution of benefits and costs |

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| | | | | | |
|---|---|---|---|---|---|
| **Impact** | What, if any, unintended consequences have been identified? | Outcome harvesting, qualitative research, contribution analysis | Interviews, case studies, surveys, administrative data | Phase 2-3 | Intended and unintended effects |
| **VfM** | To what extent did MWP represent VfM? | 4Es synthesis as per below | Process, impact and economic evaluation | Phase 3 | VfM |
| **VfM** | Were public resources used economically in establishing and supporting the programme? | 4Es assessment, evaluation synthesis | Cost data, programme records, stakeholder evidence | Phase 3 | Economy |
| **VfM** | To what extent were outputs arising from the MWP programme delivered efficiently? | 4Es assessment, evaluation evidence | Monitoring information, surveys, interviews | Phase 3 | Efficiency |
| **VfM** | How effective was MWP in delivering its objectives so far? | VfM synthesis, contribution analysis | Impact evaluation findings | Phase 3 | Effectiveness |
| **VfM** | To what extent did the benefits of MWP reach the workers and employers they were intended to reach? | Distributional analysis, equity assessment | Survey data, administrative datasets, qualitative evidence | Phase 3 | Equity |

Source: Authors' elaboration, 2026.

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