



LEGISLATION UPDATE

January 2026

Introduction and disclaimer

The main legal texts published between 1st and 31st of January 2026 are listed below, separated by main area of work: Quality, Environment, Information Security and Health & Safety.

The legal texts identified in this Newsletter do not represent all the legislation published in relation to these 4 topics. AvISO Consultancy selects the legislation which it believes will apply to the Companies with which it works. In addition, AvISO Consultancy does not take responsibility for the accuracy of any information provided and would recommend that you take appropriate legal advice in relation to any new legislation which might apply to your business, as appropriate.

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QUALITY	
Procurement Act 2023 (Threshold Amounts) (Amendment) Regulations 2025 (SI 2025/1200)	Changes in the legal register <input type="checkbox"/> yes <input checked="" type="checkbox"/> no
<p>Jurisdiction: United Kingdom</p> <p>Commencement: 1 January 2026</p> <p>Amends: Procurement Act 2023 (as enacted) and associated secondary legislation on financial thresholds</p> <p>Summary</p> <p>The Procurement Act 2023 (Threshold Amounts) (Amendment) Regulations 2025 update the financial thresholds that determine when public contracts must follow the Act's full competitive procurement processes. The amendments reflect inflationary adjustments, international trade agreement obligations, and government policy on ensuring proportionality in lower-value procurements.</p> <p>The Regulations revise threshold amounts for goods, services, works and concession contracts across central government authorities, sub-central authorities and utilities. They also introduce simplified notification requirements for contracts below revised thresholds.</p> <p>Key Provisions</p> <p>1. Updated Financial Thresholds</p> <ul style="list-style-type: none">• Central Government Authorities:<ul style="list-style-type: none">○ Goods and services thresholds are increased to reflect annual inflation and currency adjustments.○ Contracting authorities must apply the full Act procedures where the estimated contract value exceeds the new threshold amounts.• Sub-Central Authorities:<ul style="list-style-type: none">○ Thresholds for local authorities, NHS bodies and other sub-central organisations are similarly uplifted, with separate values applying to works and services contracts.• Utilities Contracts:<ul style="list-style-type: none">○ Updated thresholds apply to entities operating in water, energy, transport and postal services sectors.○ The Regulations clarify how mixed-procurement valuations should be calculated where a contract includes both regulated and exempt elements.• Concession Contracts<p>A revised concession threshold applies across all authorities, with updated valuation rules for revenue-generating contracts.</p> <p>2. Valuation and Aggregation Rules</p>	



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- Authorities must estimate contract value on the basis of total consideration payable over the full term, including potential extensions.
- The Regulations reaffirm restrictions on artificially splitting contracts or using valuation methods designed to avoid threshold application.
- Framework and dynamic market valuation rules are updated to apply the new threshold amounts consistently.

3. Transparency and Publication Duties

- For procurements above the amended thresholds, contracting authorities must continue to publish:
 - A planned procurement notice (where applicable)
 - The tender notice
 - A contract award notice
- For procurements below the updated thresholds but above specified sub-threshold limits, a simplified transparency notice may be issued.
- Publication must occur via the centralised digital platform created under the Procurement Act 2023.

4. Impact on SME and VCSE Access

- Threshold increases are intended to reduce administrative burden on lower-value procurements, helping SMEs and VCSEs compete for opportunities without disproportionate process requirements.
- Authorities are encouraged to use the Act's flexibility provisions—such as open frameworks and competitive flexible procedures—to maintain accessible and proportionate procurement routes.

Purpose and Context

The updates align UK procurement thresholds with commitments under the UK–EU Trade and Cooperation Agreement and the WTO Government Procurement Agreement.

They ensure that purchasing power parity shifts do not over-extend procedural obligations on contracting authorities, while preserving transparency and fair-competition principles for higher-value contracts.

Implications for Stakeholders

- **Contracting Authorities:**
 - Must update internal procurement templates, threshold checks, standing orders, and training materials.
 - Should review procurement pipelines to identify projects newly above or below threshold.
- **Suppliers:**
 - Need to be aware of threshold changes that may affect competition levels, documentation requirements, and visibility of opportunities.
- **Commercial & Finance Teams:**



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- Should ensure valuation methodologies and approval processes reflect the updated thresholds before January 2026.

Procurement Act 2023 (Commencement No. 4) Regulations 2025 (SI 2025/1316)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Commencement: 15 December 2025 and brings into force (for most procurements) s.69 and s.71 on 1 January 2026 and s.70 on 1 April 2026 (with specific Wales phasing).

Amends: Brings further provisions of the Procurement Act 2023 into force

Summary

The Procurement Act 2023 (Commencement No. 4) Regulations 2025 activate the next phase of the UK's post-Brexit procurement regime. The Regulations were published in December 2025 and bring into force several remaining provisions of the Act that become operational for procurements beginning in January 2026.

These provisions introduce new transparency duties, updated supplier-remedy processes, mandatory digital publication requirements and contract-management obligations. The Regulations also establish transitional arrangements for procurements launched before full commencement.

Key Provisions

1. Activation of Transparency and Publication Duties

- Commences requirements to publish:
 - Contract details notices
 - Pipeline notices for contracts above relevant thresholds
 - Contract termination notices
- All notices must be published via the Act's central digital platform.
- Applies to all procurement processes starting on or after January 2026, following the December 2025 commencement.

2. Contract Management Obligations

- Authorities must maintain digital contract records and monitor performance against published KPIs.
- Contracts above certain thresholds require at least three KPIs, with results published at prescribed intervals.
- Persistent under-performance may support future debarment considerations.

3. Supplier Remedies Regime

- The Regulations activate the Act's modernised challenge framework.



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- New standstill rules, timelines and corrective measures replace the legacy EU-derived remedies system.
- Courts gain updated powers on pre-contractual suspension, review and damages.

4. Digital Platform Requirements

- Mandatory use of the UK's single digital procurement platform for all commenced transparency notices.
- Contracting authorities must update templates, workflows and internal systems accordingly.

5. Transitional and Saving Provisions

- Procurements formally started before 15 December 2025 may continue under the Public Contracts Regulations 2015.
- Frameworks awarded pre-commencement continue under existing rules until expiry.
- Mixed procurements or multi-lot arrangements may require case-specific assessment.

Purpose and Context

Commencement No. 4 forms a key part of the Government's staged rollout of the Procurement Act 2023. The Regulations ensure a structured transition to the new procurement regime, giving authorities and suppliers time to adjust to strengthened transparency and challenge mechanisms.

With full operational duties applying from January 2026, the UK moves to the final stage of its post-Brexit procurement reforms.

Implications for Stakeholders

- **Contracting Authorities:**
 - Must update standing orders, procurement manuals, templates and internal approval processes.
 - Staff must be trained on transparency duties, KPI monitoring and the updated supplier-remedies process.
- **Suppliers:**
 - Need to understand the new remedies framework and increased visibility requirements.
 - Should prepare for enhanced scrutiny of contract-performance information.
- **Commercial, Legal and Finance Teams:**
 - Must identify procurements that fall under the new regime from January 2026.
 - Need to ensure digital readiness for mandatory notice publication and contract-management reporting.

Economic Crime and Corporate Transparency Act 2023 (Commencement No. 7) Regulations 2026 (SI 2026/57)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom



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Commencement: 10 January 2026 and brings s.49 & Sch.1 into force on 26 January 2026 (removal of central register option for members, plus technical commencement fixes).

Amends: Brings further provisions of the Economic Crime and Corporate Transparency Act 2023 into force.

Summary

The Economic Crime and Corporate Transparency Act 2023 (Commencement No. 7) Regulations 2026 bring into force a further set of measures designed to strengthen the UK's corporate transparency regime, improve the integrity of the companies register, and enhance enforcement tools against economic crime.

The activated provisions expand the powers of Companies House, introduce new identity-verification requirements, and commence additional offences and sanctions relating to false filings, opaque ownership structures and misuse of corporate entities.

Key Provisions

1. Identity Verification Requirements

- The Regulations commence statutory identity-verification duties for:
 - Directors of UK companies
 - Persons with Significant Control (PSCs)
 - General partners in limited partnerships
 - Authorised corporate service providers (ACSPs) submitting filings
- Verification must be completed using Companies House-approved digital processes or through an ACSP.
- Companies House may reject filings or impose restrictions where verification is incomplete.

2. Strengthened Powers for Companies House

- Activation of expanded powers to query, refuse or remove information on the register where accuracy or legitimacy is in doubt.
- Companies House may require supporting evidence for filings, including information on ownership, control and lawful business activity.
- Enhanced data-sharing powers allow cooperation with HMRC, the NCA, FCA and other enforcement bodies.

3. New and Commenced Offences

- Commences additional criminal and civil penalties relating to:
 - Failure to complete identity verification
 - Submitting misleading, false or incomplete information
 - Using corporate structures for unlawful purposes
- The Regulations operationalise director-level liability for knowingly or recklessly authorising false filings.

4. Limited Partnership Reforms

- Brings into effect further transparency requirements for limited partnerships, including:
 - Verified general partner identity



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- Registered UK service address requirements
- Annual confirmation duties

- Companies House gains new powers to deregister non-compliant limited partnerships.

5. Filing and Register Integrity Measures

- Commences rules requiring all company filings to be made through verified individuals or ACSPs.
- Incorrect or fraudulent information may be suppressed, amended or removed.
- New financial penalties may be imposed administratively, reducing reliance on prosecution.

Purpose and Context

This commencement stage supports the UK's strategy for tackling economic crime by improving the reliability of corporate data, increasing scrutiny on beneficial ownership, and restricting misuse of UK legal entities.

It forms part of the multi-stage implementation of the Economic Crime Plan and aligns with commitments to improve corporate governance and transparency in the post-Brexit regulatory environment.

Implications for Stakeholders

- **Companies and Directors:**
 - Must ensure identity-verification requirements are completed promptly.
 - Filing practices, record-keeping and internal controls will need updating to meet new accuracy standards.
- **Persons with Significant Control (PSCs):**
 - Required to complete verification and ensure timely provision of accurate ownership information.
- **Authorised Corporate Service Providers (ACSPs):**
 - Must comply with new verification, record-keeping and assurance duties.
 - Increased scrutiny applies to all filings submitted on behalf of clients.
- **Compliance, Legal and Finance Teams:**
 - Need to update governance frameworks, Companies House procedures, and onboarding documentation.
 - Should prepare for potential Companies House queries and evidence requests.

Rehabilitation of Offenders Act 1974 (Exceptions) (Amendment) (England and Wales) Order 2026 (SI 2026/41)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: England and Wales

Commencement: 12 January 2026 and comes into force 21 January 2026.

Amends: Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975



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Summary

The Rehabilitation of Offenders Act 1974 (Exceptions) (Amendment) (England and Wales) Order 2026 updates the list of professions, activities and positions exempt from the standard disclosure rules under the Rehabilitation of Offenders Act 1974.

The amendments expand the circumstances in which spent convictions may be lawfully requested, disclosed or considered as part of safeguarding, vetting, licensing and recruitment processes.

Key Provisions

1. Updated Exceptions for Safeguarding Roles

- Additional roles involving close contact with children and vulnerable adults are brought within the exception regime.
- The changes align safeguarding-related exceptions with updated regulatory frameworks across education, health and social care.
- Organisations conducting enhanced DBS checks must apply the revised criteria from commencement.

2. Amendments to Financial and Regulatory Positions

- Certain regulated financial services functions are added or clarified within the list of exempt positions, reflecting updated risk and integrity requirements under UK financial regulation.
- The amendments support more rigorous assessment of honesty, integrity and fitness for roles involving access to sensitive financial information.

3. Clarification of Legal and Judicial Exceptions

- The Order clarifies which judicial office-holders, tribunal members and legal regulatory appointments fall within the exception regime.
- This ensures consistent vetting standards across courts, tribunals and related legal functions.

4. Licensing and Authorisation Exceptions

- Amendments apply to specific licensing authorities, allowing them to request and consider spent convictions when determining suitability for licences associated with safeguarding, security, public protection or regulated premises.
- The changes update cross-references to other laws amended since the 1975 Order was last revised.

5. Operational Requirements for Employers and Regulatory Bodies

- Employers, licensing bodies and regulators must ensure recruitment, vetting and disclosure policies reflect the updated list of excepted roles.
- DBS application forms, position eligibility lists and internal HR guidance must be updated accordingly.

Purpose and Context

The amendments support the UK Government's continuing reforms to safeguarding, regulatory oversight and public-protection frameworks.



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They ensure that exceptions to spent-conviction protections remain aligned with updated safeguarding risks, regulatory obligations and professional-integrity standards.

The Order also reflects changes across associated legislation, ensuring the exceptions regime remains coherent, proportionate and fit for purpose.

Implications for Stakeholders

- **Employers and Recruiters:**
 - Must review job roles to determine eligibility for requesting spent convictions.
 - Recruitment processes, job descriptions and DBS eligibility checks must be updated.
- **Regulators and Licensing Authorities:**
 - Should update statutory guidance, application forms and decision-making templates to reflect new exceptions.
- **Safeguarding Leads and HR Teams:**
 - Must ensure that revised exceptions are reflected in safeguarding policies, volunteer checks and suitability assessments.
- **Legal and Compliance Teams:**
 - Should update risk assessments, governance documents and training materials to ensure consistent compliance with the amended exception regime.

Employment Rights Act 2025 (c.36)

**Changes in the
legal register**

☒ yes ☐ no

Jurisdiction: United Kingdom

Commencement: 6 January 2026 (with some elements phased from late 2025)

Amends: Primary employment rights framework across multiple statutes including the Employment Rights Act 1996, the Trade Union and Labour Relations (Consolidation) Act 1992, and associated secondary legislation.

Summary

The Employment Rights Act 2025 introduces a series of reforms affecting pay, contracts, working conditions and worker protections across the UK labour market. It implements changes relating to zero-hours and atypical contracts, pay transparency, flexible-working rights, redundancy protections, and enforcement mechanisms.

Key Provisions

1. Zero-Hours and Atypical Work Contracts

- Workers who have worked a regular pattern for a qualifying period now gain the right to request a predictable working contract.
- Employers must provide objective reasons for refusal within statutory time limits.



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- The Act strengthens protections against detriment for workers seeking contractual stability.

2. Pay Transparency and Information Requirements

- Employers with 250+ staff must publish annual pay transparency statements covering:
 - Salary bands
 - Criteria for pay progression
 - Bonus distribution summaries
- The Secretary of State may extend the duty to additional sectors via future regulations.

3. Flexible Working Reforms

- The right to request flexible working becomes a day-one right.
- Employees may submit two requests per year, and employers must consult before refusal.
- Decision deadlines are reduced to improve response times and procedural fairness.

4. Strengthened Redundancy Protections

- Pregnancy and new-parent redundancy protection is extended to cover:
 - The period from pregnancy notification
 - 18 months after birth or adoption placement
- Employers must follow updated notification and selection processes.

5. Enhanced Enforcement Powers

- The Act expands the remit of the **Labour Market Enforcement Authority**.
- New civil penalties are introduced for:
 - Failure to provide statutory employment particulars
 - Unlawful deduction of wages
 - Exploitative scheduling practices
- Persistent offenders may face publication sanctions.

6. Reforms to Trade Union and Collective Rights

- Updates rules around union access to workplaces and electronic balloting pilots.
- Strengthens protection from unfair dismissal for individuals engaged in lawful industrial action within statutory limits.

Purpose and Context

The legislation forms part of the Government's post-pandemic employment reform agenda, targeting job security, fairness and transparency.

It responds to concerns about precarious work, wage inequality, and barriers to flexible working.

The Act also strengthens the enforcement architecture to ensure employment rights are more effectively upheld across all sectors.

Implications for Stakeholders

- **Employers:**



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- Must update HR policies, employment contracts, and recruitment materials.
- Pay-transparency reporting requires early data collection and governance setup.
- **HR and People Teams:**
 - Need to implement new flexible-working handling processes.
 - Must identify workers eligible for predictable-work-pattern requests.
- **Legal and Compliance Teams:**
 - Should update risk assessments, templates and internal training to ensure alignment with new statutory duties.
- **Employees and Workers:**
 - Benefit from improved clarity on pay, stronger redundancy protections, greater voice in scheduling, and quicker access to flexible-working arrangements.

Employment Rights Act 2025 (Minimum Service Levels) (Consequential Revocation) Regulations 2026 (SI 2026/42)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Commencement: 18 January 2026

Amends: Revokes previous secondary legislation made under the Strikes (Minimum Service Levels) Act 2023 and removes associated transitional instruments

Summary

These Regulations revoke a series of instruments connected to the former Minimum Service Levels (MSL) framework introduced under the Strikes (Minimum Service Levels) Act 2023.

The revocations follow the enactment of the **Employment Rights Act 2025**, which replaces the previous MSL regime with a revised statutory approach to industrial action, collective bargaining, and worker protections.

Key Provisions

1. Revocation of Minimum Service Levels Regulations

- The Regulations remove previously enacted sector-specific MSL rules, including those covering:
 - Transport
 - Health services
 - Education
 - Border security
 - Fire and rescue
- Revocation ensures that the earlier statutory MSL notices, compliance mechanisms, and enforcement routes no longer apply from commencement.

2. Removal of Employer Duties Under the 2023 Framework



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- Employers are no longer required to:
 - Issue work notices identifying staff required during strike action
 - Apply sanctions for non-compliance with such notices
 - Follow procedural obligations concerning minimum staffing thresholds
- Existing work notices automatically lapse upon commencement.

3. Consequential Amendments Across Related Legislation

- Revocations extend to cross-references within:
 - Collective bargaining provisions
 - Industrial action procedures
 - Worker protection and unfair-dismissal rules
- These amendments ensure coherence with the new statutory framework introduced by the Employment Rights Act 2025.

4. Transition to the New Industrial-Action Regime

- A new system of rights, obligations and procedural safeguards replaces the former MSL approach.
- The revised model emphasises:
 - Strengthened consultation duties
 - Enhanced union-employer negotiation mechanisms
 - Updated protections for workers engaged in lawful strike action

Purpose and Context

The Regulations complete the legislative transition away from the previous Minimum Service Levels model towards a broader industrial-relations reform agenda.

They reflect the Government's intent to replace prescriptive service-level mandates with a revised framework focused on negotiated solutions, procedural fairness and strengthened protections against retaliatory action during strikes.

Revoking the earlier instruments ensures clarity, prevents duplication, and removes outdated statutory requirements that conflict with the new Act.

Implications for Stakeholders

- **Employers:**
 - Must update industrial-action contingency plans and remove references to MSL work notices or associated enforcement steps.
 - Should implement new consultation and negotiation procedures aligned with the Employment Rights Act 2025.
- **Trade Unions:**
 - Benefit from clearer collective-action rules and removal of previous MSL-related obligations.
 - Should review updated statutory processes for lawful ballots, notice requirements and dispute resolution.



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- **HR, Legal and Employee-Relations Teams:**

- Must revise industrial-action policies, staff communications and risk assessments.
- Should ensure management training reflects the removal of MSL-based obligations and the introduction of revised protections.

ENVIRONMENTAL

Climate Change Agreements (Administration and Eligible Facilities) (Amendment) Regulations 2025 (SI 2025/813)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Commencement: 1 January 2026

Amends: Climate Change Agreements (Administration) Regulations 2012; Climate Change Agreements (Eligible Facilities) Regulations 2012

Summary

The Climate Change Agreements (Administration and Eligible Facilities) (Amendment) Regulations 2025 introduce updated rules governing eligibility, administration and compliance requirements for participation in the UK's Climate Change Agreements (CCA) scheme.

The Regulations support the next phase of the UK's industrial decarbonisation strategy by revising target periods, strengthening reporting obligations and clarifying eligibility criteria for energy-intensive facilities.

Key Provisions

1. Updated Eligibility Criteria for Facilities

- Eligibility thresholds for energy-intensive operations are revised to reflect changes in industry classifications and updated carbon-intensity benchmarks.
- New guidance is provided on defining eligible process boundaries and ensuring consistency across multi-site organisations.
- Sector associations must reassess facility lists to confirm continued eligibility under the amended criteria.

2. New Target Periods and Performance Requirements

- The Regulations introduce Target Period 7 (2026), Target Period 8 (2027–2028) and Target Period 9 (2029–2030).
- Each period includes revised energy-efficiency or carbon-reduction requirements aligned with the UK's 2030 carbon-budget trajectory.



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- Facilities must demonstrate compliance with updated targets to retain CCA discounts on the Climate Change Levy (CCL).

3. Strengthened Administrative and Reporting Obligations

- Annual reporting requirements are expanded to include:
 - Detailed metering data
 - Evidence of on-site energy-efficiency measures
 - Verification of carbon-saving calculations
- Records must be maintained in a format suitable for audit and inspection.
- The Environment Agency is granted greater discretion to request additional information and supporting evidence.

4. Updated Buy-Out Fee and Compliance Measures

- The buy-out fee for failing to meet CCA targets increases to £37 per tonne of CO₂e from 2027 onward, replacing the previous £25 rate.
- Facilities unable to meet targets may still use buy-out mechanisms, provided all reporting obligations are satisfied.
- Persistent non-compliance may result in removal from the scheme.

5. Centralised Electronic Register

- A new electronic administration system is introduced to:
 - Record agreements
 - Capture performance data
 - Streamline communication between facilities, sector associations and the Environment Agency
- Scheme participants must transition to the new system by the specified deadlines in 2026.

Purpose and Context

These amendments form part of the UK Government's wider programme to support industrial decarbonisation, improve energy-efficiency performance and ensure the CCA scheme continues to drive measurable carbon reductions.

By updating target periods and tightening reporting standards, the Regulations enhance accountability and ensure concessions under the CCL are linked to demonstrable environmental benefits.

They also modernise administrative processes to improve transparency, reduce duplication and support long-term policy alignment with national climate goals.

Implications for Stakeholders

- **Facilities Participating in CCAs:**
 - Must review eligibility under the amended rules and update energy-efficiency strategies.
 - Required to prepare for enhanced reporting and verification expectations.
- **Sector Associations:**
 - Need to update member guidance, eligibility lists and data-submission procedures.



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- Must ensure integration with the new electronic register.

- **Environment Agency:**

- Gains expanded oversight powers and updated enforcement tools.
- Must issue updated guidance and support documents for regulated sectors.

- **Energy, Sustainability and Compliance Teams:**

- Should revise internal processes, data-collection systems and carbon-reduction plans to reflect new target-period requirements.
- Must ensure clarity on buy-out options, compliance timelines and CCL discount retention.

Vehicle Emissions Trading Schemes (Amendment) (No. 2) Order 2025 (SI 2025/1101)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Commencement: 1 January 2026

Amends: Vehicle Emissions Trading Schemes Order 2023 and subsequent amendments

Summary

The Vehicle Emissions Trading Schemes (Amendment) (No. 2) Order 2025 introduces further refinements to the UK's Vehicle Emissions Trading Schemes (VETS) framework for cars and vans.

The amendments clarify credit-trading rules, update reporting and verification processes, expand data-submission requirements, and make technical adjustments to support the UK's Zero Emission Vehicle (ZEV) mandate and overall decarbonisation trajectory for 2030 and beyond.

Key Provisions

1. Amendments to Credit Banking, Borrowing and Trading Rules

- Updated limits on credit banking and inter-year borrowing provide additional flexibility for manufacturers with fluctuating annual ZEV sales.
- Revised restrictions aim to prevent strategic stockpiling of credits and ensure that the overall emissions trajectory remains aligned with statutory carbon-budget requirements.
- The Order also clarifies how credits generated from plug-in hybrids or special-purpose vehicles can be transferred across related manufacturer groups.

2. Enhanced Reporting and Data Submission Requirements

- Manufacturers must submit more granular datasets on:
 - Fleet CO₂ performance
 - Model-level ZEV registrations
 - Credits earned, used, banked or traded



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- The Department for Transport (DfT) may prescribe additional data formats and validation checks through guidance issued under the amended provisions.
- Reporting deadlines are aligned with the annual compliance cycle beginning January 2026.

3. Verification and Audit Provisions

- The Vehicle Certification Agency (VCA) gains strengthened powers to verify emissions data, require resubmission where errors are identified, and undertake compliance audits.
- Verification requirements now apply equally to low-volume and niche-manufacturer declarations, closing previous loopholes.

4. Adjustments to ZEV Credit Calculations and Incentives

- Updates are made to credit-multiplier values for early deployment of high-range ZEVs.
- Clarifications are added regarding eligibility of hydrogen fuel-cell vehicles and vehicles meeting ultra-low-emission benchmarks.
- These refinements support innovation, encourage earlier market adoption of advanced technologies, and align ZEV targets with the UK's 2035 phase-out commitments.

5. Interaction with International Frameworks

- The Order refines provisions to support compatibility with international vehicle-compliance regimes, including EU and Californian ZEV credit systems where cross-recognition is beneficial.
- Adjusted definitions reduce administrative misalignment for multinational manufacturers operating across several regulatory jurisdictions.

Purpose and Context

The UK's VETS framework is a key mechanism supporting national decarbonisation of the light-vehicle fleet.

This amending Order ensures the scheme remains technically robust, transparent and aligned with both domestic carbon-budget requirements and evolving international approaches.

By refining credit rules, improving data quality, and strengthening verification powers, the Order increases accountability and encourages timely adoption of zero-emission technologies.

Implications for Stakeholders

- **Vehicle Manufacturers and Importers:**
 - Must update compliance models, internal forecasting tools and data-collection systems.
 - Should review ZEV credit strategies for the 2026 cycle and adjust for new banking and borrowing limits.
- **Compliance and Environmental Teams:**
 - Need to prepare for enhanced audit scrutiny and more detailed reporting expectations.
 - Must ensure evidence supporting credits and emissions declarations is complete and technically defensible.
- **Vehicle Certification Agency (VCA):**



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- Gains expanded verification powers and must prepare revised audit protocols and sector guidance.
- **Fleet Operators and Distributors:**
 - May experience indirect effects through manufacturer pricing or supply-chain adjustments linked to revised credit-market dynamics.

The Producer Responsibility Obligations (Packaging and Packaging Waste) (Amendment) Regulations 2025 (SI 2025/1369)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Commencement: 1 January 2026

Amends: Producer Responsibility Obligations (Packaging Waste) Regulations 2007 and subsequent amendments

Summary

These Regulations make further changes to the UK's extended producer responsibility (EPR) framework for packaging.

The amendments refine reporting thresholds, update definitions, adjust fee structures, strengthen data-submission requirements, and support phased implementation of EPR reforms introduced since 2023.

Key Provisions

1. Updated Producer Categories and Thresholds

- Revised turnover and tonnage thresholds determine which producers fall under:
 - Small producers
 - Large producers
 - Brand owners
 - Importers
 - Online marketplace operators
- Adjustments ensure proportionality and capture businesses previously outside the reporting system.

2. Enhanced Data-Reporting Requirements

- Producers must now submit more detailed packaging-composition data, including:
 - Material types
 - Recycled content
 - End-of-life outcomes
 - Packaging format classification



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- Reporting periods are aligned with the 2026 compliance cycle, and late submissions may incur civil penalties.

3. Modulated Fees and Cost-Recovery Adjustments

- The Regulations refine modulated-fee calculations linked to recyclability and waste-management costs.
- Producers face higher fees for packaging that is harder to recycle, contains problematic materials, or performs poorly in local-authority collection streams.
- Fee adjustments help fund UK-wide collection, sorting and recycling infrastructure improvements.

4. Clarification of Roles for Compliance Schemes

- Compliance schemes must update governance arrangements to ensure accurate member data submission.
- The Secretary of State may impose additional reporting duties on schemes where data quality or performance issues are identified.
- System rules are clarified for new market entrants and multi-site producers.

5. Strengthened Enforcement Powers

- Enforcement authorities gain additional powers to:
 - Request evidence packs
 - Conduct audits
 - Issue compliance notices
 - Impose cost-recovery charges
- Persistent non-compliance may result in loss of scheme membership or prosecution.

6. Reconciliation with EPR Transitional Provisions

- Adjustments align legacy PRN/PERN obligations with the new EPR regime.
- Transitional rules ensure that 2024–2025 obligations are settled correctly ahead of full EPR cost-recovery in future compliance years.

Purpose and Context

These amendments continue the UK's transition toward a fully operational extended producer responsibility system for packaging.

The updated rules improve data quality, strengthen cost-recovery mechanisms and promote the use of recyclable materials.

They also ensure better alignment between producer obligations, local-authority waste-management costs and the UK's broader circular-economy and net-zero objectives.

Implications for Stakeholders

- **Producers (Brand Owners, Importers, Retailers):**
 - Must submit more detailed packaging-level data.
 - Required to review packaging design choices in light of modulated-fee impacts.



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- **Compliance Schemes:**

- Must update data-handling processes, member guidance and internal assurance measures.
- Expected to play a larger role in verifying member submissions.

- **Local Authorities:**

- Will benefit indirectly from improved cost-recovery processes and enhanced data for collection planning.

- **Environmental and Compliance Teams:**

- Need to review packaging portfolios, update internal data systems and ensure timely submission of 2026 reporting information.

The Energy Performance of Buildings (Scotland) Regulations 2025 (SSI 2025/471)

Changes in the legal register

☒ yes ☐ no

Jurisdiction: Scotland

Commencement: 1 January 2026

Amends: Energy Performance of Buildings (Scotland) Regulations 2008 and related secondary legislation

Summary

The Energy Performance of Buildings (Scotland) Regulations 2025 introduce strengthened standards for energy performance certificates (EPCs), more frequent assessment requirements, and updated obligations for building owners, landlords and developers.

The amendments support Scotland's net-zero strategy by improving energy-efficiency data, tightening minimum performance standards, and increasing transparency for building users.

Key Provisions

1. Updated Requirements for EPCs

- EPC methodologies are revised to reflect Scotland-specific carbon-intensity and heating-system assumptions.
- Assessment protocols now incorporate updated SAP/ RdSAP modelling and heat-pump performance benchmarks.
- EPCs must be issued using new templates that include:
 - Heating-system emissions ratings
 - Whole-building energy-intensity measures
 - New advisory recommendations prioritising fabric-first interventions

2. New Minimum Energy-Efficiency Standards

- Certain building types must meet enhanced minimum EPC ratings at key trigger points, such as:
 - Sale



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- New tenancy
 - Major renovation
- Where buildings fail to meet the minimum standards, owners must carry out defined improvement measures within statutory deadlines.

3. Increased Assessment and Re-inspection Frequency

- EPCs for rental properties must now be renewed every five years, replacing the previous ten-year validity period.
- Public buildings above defined floor-area thresholds require more frequent Display Energy Certificate (DEC) updates.

4. Changes Affecting Landlords and Non-Domestic Premises

- Landlords must ensure their properties meet the updated EPC minimums before granting or renewing leases.
- Non-domestic premises may require additional energy-efficiency upgrades where heating-system emissions exceed defined thresholds.
- Exemptions and temporary compliance arrangements are clarified.

5. Strengthened Enforcement and Penalties

- Local authorities gain new powers to issue:
 - Improvement notices
 - Penalty charge notices
 - Compliance orders
- Non-compliance with EPC duties, minimum standards or improvement requirements may result in escalating fines.

6. Alignment with Scotland's Heat-in-Buildings Strategy

- Requirements are designed to accelerate adoption of low-carbon heating systems.
- Regulations reinforce the Scottish Government's 2030 interim emissions targets and 2045 net-zero goal.

Purpose and Context

The amendments form part of Scotland's ongoing programme to improve the energy performance of buildings, reduce emissions from heat, and support transition to low-carbon, energy-efficient building stock.

They aim to improve data quality, ensure consistency in EPC assessments, and help building occupiers understand energy performance and heating-system impacts.

The changes complement wider reforms under Scotland's Heat-in-Buildings Strategy, including future plans for mandatory zero-emission heat in certain building categories.

Implications for Stakeholders

- **Building Owners and Landlords:**



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- Must review EPC ratings and implement required improvements to meet new minimum standards.
- Should update compliance documentation and prepare for more frequent re-assessments.
- **Tenants and Occupiers:**
 - Benefit from clearer information on building energy performance and recommended improvements.
- **Public Sector Bodies:**
 - Need to ensure DEC compliance and meet enhanced data-submission requirements for public buildings.
- **Energy Assessors and EPC Providers:**
 - Must adopt the new EPC methodology, templates and reporting formats.
 - Continue professional development to meet updated technical-assessment standards.
- **Facilities, Sustainability and Compliance Teams:**
 - Should integrate new EPC duties into asset-management plans, refurbishment strategies and long-term decarbonisation roadmaps.

Land Reform (Scotland) Act 2025 (SSI 2025/15)

Changes in the legal register

☒ yes ☐ no

Jurisdiction: Scotland

Commencement: 5 January 2026 (with some elements phased later in 2026)

Amends: Establishes new statutory obligations under the Land Reform (Scotland) Act 2025 and updates several related land-management and transparency regimes

Summary

The Land Reform (Scotland) Act 2025 introduces major reforms to land ownership, management and transparency requirements across Scotland.

The Act strengthens disclosure rules for large-scale landholdings, expands public-interest tests for land transfers, enhances tenant-farming rights, and introduces new duties relating to community engagement and responsible land management.

Key Provisions

1. Large-Scale Landholdings: Disclosure and Registration

- Owners of large-scale landholdings (defined by area, location or strategic importance) must provide detailed information to the new Land and Communities Register.
- Required disclosures include:
 - Ownership structures



- Beneficial-ownership details
 - Management decision-making arrangements
- The Register supports greater transparency and local accountability.

2. Strengthened Public-Interest Tests for Land Transfers

- Transfers of significant landholdings may require a public-interest test to assess impacts on:
 - Community land opportunities
 - Economic resilience
 - Environmental and climate objectives
- Ministers may block or impose conditions on transfers that undermine long-term sustainable land use.

3. Community Engagement Duties

- Owners of large-scale landholdings must undertake formal community-engagement processes before major land-use changes, including:
 - Consultation events
 - Publication of land-management plans
 - Written responses to material community feedback
- Engagement expectations are clarified through statutory guidance.

4. Tenant-Farming Reforms

- The Act introduces additional protections for agricultural tenants, including:
 - Strengthened rights around rent assessments
 - Improvements to dispute-resolution processes
 - Clarified rules on assignation and succession
- These measures aim to improve security, fairness and long-term viability for tenant farmers.

5. Environmental and Climate-Related Conditions

- Land managers must consider climate-adaptation and biodiversity requirements when developing long-term land-use plans.
- The Act aligns with Scotland's climate-change targets and encourages responsible peatland management, woodland creation and nature-restoration projects.

6. Enforcement and Compliance Powers

- New powers allow regulators to:
 - Issue compliance notices
 - Conduct investigations
 - Require corrective action
- Failure to comply with disclosure or engagement duties may attract civil penalties.

Purpose and Context

The Act continues Scotland's long-running land-reform agenda, aiming to:



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- Increase transparency of land ownership and decision-making
 - Strengthen community participation in land-use changes
 - Support fairer and more sustainable rural economies
 - Contribute to national climate-change and biodiversity commitments
- It represents one of the most significant updates to Scotland's land-governance framework in over a decade.

Implications for Stakeholders

- **Landowners and Estate Managers:**
 - Must meet new disclosure and community-engagement duties.
 - Need to review land-transfer processes for public-interest considerations.
- **Community Bodies:**
 - Gain improved access to information and structured engagement opportunities.
 - May benefit from strengthened mechanisms supporting community acquisition or influence over land use.
- **Tenant Farmers:**
 - Benefit from strengthened rights around rent, assignation and long-term security.
- **Environmental, Legal and Compliance Teams:**
 - Must update land-management strategies, internal policies and reporting arrangements to reflect statutory requirements.
 - Should review whether holdings fall under the definition of "large-scale landholdings".

Regulation (EU) 2025/2650 as regards certain obligations of operators and traders

Changes in the legal register

☐ yes ☒ no

Jurisdiction: European Union (with relevance for GB/NI divergence considerations)

Commencement: 1 January 2026

Amends: Regulation (EU) 2023/1115 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation.

Summary

Regulation (EU) 2025/2650 introduces new and strengthened obligations for operators and traders placing certain regulated products, materials or commodities on the EU market.

It establishes mandatory due-diligence duties, traceability requirements, record-keeping obligations and information-submission mechanisms designed to improve product integrity, environmental protection and supply-chain transparency.

Key Provisions

1. Due-Diligence Obligations for Operators



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- Operators placing regulated products or commodities on the EU market must perform risk assessments covering:
 - Origin of materials
 - Supplier risk indicators
 - Environmental-impact factors
 - Social-compliance considerations
- Operators must implement risk-mitigation plans where non-negligible risks are identified.
- Compliance documentation must be maintained and made available to competent authorities upon request.

2. Traceability and Supply-Chain Documentation

- Operators must maintain a complete chain-of-custody record for all relevant products placed on the market.
- Unique identifiers or batch-level traceability may be required to validate origin and compliance.
- Digital systems may be used to facilitate real-time traceability and reporting.

3. Obligations for Traders

- Traders involved in distribution, resale or downstream placement must:
 - Retain supplier information
 - Keep transaction records for all regulated products
 - Ensure that upstream operators have complied with required due-diligence duties
- Traders must provide documentation to authorities within statutory timeframes.

4. Information Submission via EU Digital Platforms

- The Regulation activates use of an EU-level digital compliance platform for operators and traders to upload declarations, risk assessments and supporting evidence.
- Competent authorities across the EU may access this information for enforcement, cross-checking and risk-profiling.

5. Enforcement and Market-Surveillance Provisions

- Competent authorities gain strengthened powers to:
 - Conduct inspections
 - Request documents and evidence
 - Investigate supply-chain irregularities
 - Impose sanctions, including suspension, withdrawal or prohibition of market access
- Penalty levels are aligned with the EU's wider market-surveillance framework, ensuring deterrence and consistency.

Purpose and Context

Regulation (EU) 2025/2650 is part of the EU's continued shift toward stricter supply-chain due diligence, environmental protection and product-integrity measures.



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It aligns with broader EU policy initiatives, including sustainability reporting, responsible sourcing, anti-deforestation measures and enhanced market-surveillance powers.

The Regulation aims to prevent unlawful, harmful or non-compliant goods from entering the EU market and to improve accountability across global supply chains.

Implications for Stakeholders

- **Operators (Manufacturers, Importers, Primary Placing-on-the-Market Entities):**
 - Must implement formal due-diligence systems, risk-assessment protocols, supplier vetting and documentation controls.
 - Required to maintain and submit declarations via the EU digital platform.
- **Traders (Distributors, Brokers, Resellers):**
 - Must retain and supply upstream compliance documentation.
 - Need to ensure that supply-chain partners fulfil due-diligence obligations.
- **Compliance, Sustainability and Supply-Chain Teams:**
 - Must update procurement policies, supply-chain mapping, traceability systems and record-retention practices.
 - Should assess whether existing supplier contracts meet the Regulation's new mandatory requirements.
- **UK Exporters to the EU:**
 - Despite GB regulatory divergence, companies placing goods on the EU market must comply fully with these EU-level obligations.
 - Northern Ireland businesses may have direct obligations depending on regulatory alignment under the Windsor Framework.

INFORMATION SECURITY

The Data (Use and Access) Act 2025 (Commencement No. 5) Regulations 2026 (SI 2026/31)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Commencement: 14 January 2026

Amends: Brings further provisions of the Data (Use and Access) Act 2025 into force

Summary

The Data (Use and Access) Act 2025 (Commencement No. 5) Regulations 2026 activate the next set of operational duties under the Act, focusing on data-access gateways, public-sector data-sharing mechanisms, and the strengthening of safeguards for data re-use across regulated sectors.



LEGISLATION UPDATE

January 2026

These provisions enhance the UK's data-governance framework, support responsible data-driven innovation, and ensure consistent safeguards for organisations accessing or processing protected datasets.

Key Provisions

1. Activation of Public-Sector Data-Access Gateways

- Commences provisions enabling government departments and public authorities to share datasets through designated data-access gateways.
- Gateways must meet statutory requirements covering:
 - Necessity and proportionality
 - Defined public-interest purposes
 - Independent oversight
- Sector-specific codes of practice are enabled but may be issued later in 2026.

2. Rules for Accredited Data-Access Bodies

- Commencements bring into force provisions regulating bodies accredited to provide secure access to sensitive datasets.
- Accredited bodies must comply with:
 - Security and technical-standards requirements
 - Reporting obligations to the Commissioner for Data Use
 - Auditable access-control and monitoring systems
- Organisations seeking accreditation must follow updated application routes.

3. Strengthened Safeguards for Data Re-Use

- Provisions relating to secondary data use and re-use safeguards are activated, including stricter controls around:
 - Identification risks
 - Cross-dataset linkage
 - Transparency for data subjects
- Enhanced documentation and risk-assessment requirements apply for data re-use, especially in research, analytics and AI-model training.

4. Enforcement and Oversight Powers

- The Commissioner for Data Use gains expanded powers to:
 - Issue notices to cease unauthorised sharing
 - Require additional safeguards
 - Conduct compliance audits
 - Impose penalties for systematic misuse or breaches
- These powers support consistent enforcement across both public-sector and private-sector entities engaging with government datasets.

5. Updates to Data-Sharing Registers and Transparency Duties



LEGISLATION UPDATE

January 2026

- Public-sector bodies must keep data-sharing logs and submit annual summaries of data-access activities.
- New transparency-statement requirements apply to high-impact data uses involving sensitive or large-scale datasets.

Purpose and Context

The Data (Use and Access) Act 2025 forms a central part of the UK's post-EU data-governance model, aiming to balance innovation with strengthened privacy and security protections.

Commencement No. 5 supports implementation of the Government's National Data Strategy, enabling safe data-driven research, improved public-service delivery and responsible interoperability between public and private sectors.

It ensures that organisations accessing government-held data follow consistent, accountable and proportionate processes.

Implications for Stakeholders

- **Public-Sector Bodies:**
 - Must implement new gateway requirements, transparency logs and documentation standards.
 - Should review internal data-sharing policies and governance frameworks.
- **Private-Sector Organisations Accessing Government Datasets:**
 - May need updated contracts, data-sharing agreements and safeguard assessments.
 - Must comply with strengthened secondary-use controls.
- **Accredited Data-Access Bodies:**
 - Required to meet new reporting obligations, audit expectations and security standards.
- **Legal, Data-Governance and Compliance Teams:**
 - Need to update risk assessments, internal guidance and data-processing documentation.
 - Should ensure readiness for potential oversight or enforcement action by the Commissioner for Data Use.

Government Cyber Action Plan

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Publication / Applicability: 6 January 2026

Amends: N/A – policy framework implementing actions under the National Cyber Strategy and the forthcoming Cyber Security and Resilience Act (once enacted)

Summary



LEGISLATION UPDATE

January 2026

The Government Cyber Action Plan sets out how the UK Government will strengthen cybersecurity across central government and the wider public sector.

It presents a multi-year programme to reduce cyber risk, enhance resilience, establish mandatory minimum standards, create a Government Cyber Unit, and align government departments with the same cybersecurity expectations being placed on critical national infrastructure providers.

Key Provisions

1. New Government Cyber Unit

- A central Government Cyber Unit is established within the Department for Science, Innovation and Technology (DSIT).
- Functions include:
 - Coordinating risk identification and incident response across departments
 - Setting and maintaining central cyber-security standards
 - Overseeing capability development and threat reporting

2. Mandatory Cybersecurity Requirements for Public Services

- Government departments must meet cybersecurity standards equivalent to those imposed on essential-service operators under the Cyber Security and Resilience Bill.
- Requirements cover secure-by-design development, risk management, service continuity and breach response.

3. Government-wide Cyber Risk Management

- The Plan introduces centralised risk assessment and oversight, replacing siloed risk ownership.
- DSIT's State of Digital Government Report identified critically high cyber risk across government, and the Plan outlines measures to reduce this.

4. Improved Incident Response and Recovery

- The Plan mandates coordinated government-wide response to major cyber incidents.
- Builds on existing structures such as the Government Cyber Coordination Centre (GC3).
- Departments must maintain updated response plans and exercise them regularly.

5. Strengthened Support and Skills Framework

- A new Government Cyber Profession is introduced, improving recruitment, training and retention of cybersecurity specialists.
- Central support services will provide shared tools, standards, training and expertise.

6. Minimum Standards Across the Supply Chain

- Suppliers delivering services into central government must meet strengthened and consistently applied cybersecurity baseline requirements.
- Higher scrutiny applies to critical and high-risk suppliers.

7. Long-term Implementation Roadmap

- The Plan sets three phases:



LEGISLATION UPDATE

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- Building (to March 2027)
- Scaling (2027–2029)
- Improving (2029 onwards)

Purpose and Context

The Government Cyber Action Plan addresses escalating cyber threats, including state-sponsored attacks, ransomware incidents and vulnerabilities in legacy systems.

It seeks to ensure that government services are designed, maintained and delivered with robust cyber resilience, supporting the Prime Minister’s wider programme for modern digital government.

The Plan also responds to recent high-impact breaches affecting NHS suppliers, legal services and central government bodies, demonstrating risks to public services.

Implications for Stakeholders

- **Government Departments and Agencies:**
 - Must update risk-management processes, adopt the central cybersecurity baseline, and engage with the new Government Cyber Unit.
- **Public-Sector IT, Digital and Security Teams:**
 - Need to implement secure-by-design standards, strengthen incident-response processes and ensure alignment with central support services.
- **Suppliers to Government:**
 - Required to comply with strengthened supply-chain cybersecurity standards, with increased scrutiny for essential-service providers.
- **Compliance, Assurance and Audit Teams:**
 - Should review internal cyber-risk documentation, update assurance frameworks (including GovAssure processes), and prepare for heightened oversight.

Government Cyber Security Policy Handbook

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Publication / Applicability: January 2026

Amends: N/A – non-statutory guidance supporting the Government Cyber Action Plan and the National Cyber Strategy

Summary

The Government Cyber Security Policy Handbook provides a consolidated set of mandatory expectations, recommended practices and operational guidance for government departments and public-sector organisations.



LEGISLATION UPDATE

January 2026

Issued alongside the publication of the Government Cyber Action Plan in January 2026, the Handbook is intended to ensure consistent implementation of cyber-security requirements across central government, arm's-length bodies and the wider public sector.

It sets out baseline controls, assurance processes, roles and responsibilities, and technical-security measures required to strengthen resilience across digital public services.

Key Provisions

1. Cyber-Security Baseline Requirements

- Defines the minimum set of cybersecurity controls that all government organisations must implement.
- Baselines cover:
 - Identity and access management
 - Secure-by-design development practices
 - Protective monitoring and logging
 - Patch management and vulnerability remediation
 - Data-handling and encryption controls

2. Governance, Accountability and Roles

- Clarifies governance responsibilities across departments, including:
 - Senior Responsible Owners for cyber risk
 - Departmental Security Officers
 - Chief Information Security Officers (CISOs)
- Requires departments to maintain documented cyber-risk registers and report risk ratings through central oversight mechanisms.

3. Secure System Design and Development

- Provides mandatory design principles for government digital services, ensuring systems are:
 - Resilient, fault-tolerant and recoverable
 - Built using approved development and testing processes
 - Subject to regular security reviews and architecture assurance

4. Incident Response and Recovery Standards

- Sets requirements for maintaining incident-response plans aligned with the central Government Cyber Unit.
- Requires participation in cross-government exercises and maintaining defined recovery time objectives.
- Mandates timely reporting of incidents through the Government Cyber Coordination Centre (GC3).

5. Supply-Chain Cybersecurity

- Establishes minimum cybersecurity requirements for suppliers delivering goods or services to government.



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- Requires supply-chain risk assessments, contractual security clauses and assurance of third-party compliance.
- Ensures alignment with the Cyber Security and Resilience Bill's expected supply-chain standards.

6. Assurance and Compliance

- Aligns department-level assurance with the GovAssure process.
- Requires annual independent assessments and periodic penetration testing.
- Introduces escalation routes for departments that fail to meet baseline requirements.

7. Skills, Training and Professionalisation

- Sets expectations for staff awareness training and technical-skills development.
- Supports professionalisation of the government cyber-security workforce under the Government Cyber Profession framework.

Purpose and Context

The Handbook operationalises the Government Cyber Action Plan by providing detailed, actionable requirements for departments responsible for safeguarding sensitive information, critical services and digital public-service platforms.

It addresses long-standing vulnerabilities identified in independent audits, supports the transition to a unified government-wide cyber-security model, and underpins implementation of the National Cyber Strategy.

Implications for Stakeholders

- **Government Departments and Arm's-Length Bodies:**
 - Must adopt all stated baseline requirements, update policies, and ensure alignment with central oversight processes.
- **IT, Security and Digital Teams:**
 - Need to implement updated technical controls, design standards and testing requirements.
 - Must update documentation to reflect the new Policy Handbook.
- **Suppliers and Contractors:**
 - Required to ensure their products and services meet strengthened cyber-security expectations.
 - May face additional due-diligence and assurance checks.
- **Compliance, Audit and Governance Teams:**
 - Must review existing cyber-security policies, update risk registers, and ensure continuous adherence to baseline standards.

NIS Directive and NIS Regulations 2018: Ofgem guidance for Operators of Essential Services

Changes in the legal register



LEGISLATION UPDATE

January 2026

☐ yes ☒ no

Jurisdiction: United Kingdom (energy sector – England, Scotland and Wales)

Publication / Applicability: Updated guidance applicable from January 2026

Amends: Supplements the Network and Information Systems Regulations 2018 (SI 2018/506)

Summary

Ofgem's updated guidance for Operators of Essential Services (OES) sets out how the NIS Regulations apply across the gas and electricity sectors, including expectations for risk management, incident reporting, digital-infrastructure resilience and enforcement.

It clarifies regulatory expectations under the NIS Regulations 2018 and aligns the UK energy-sector approach with wider government policies on cyber security and resilience, including the Government Cyber Action Plan.

Key Provisions

1. Scope and Identification of OES

- Confirms which entities qualify as Operators of Essential Services (e.g. transmission operators, distribution network operators, gas shippers, gas-supply licence holders, and key generation operators).
- Provides updated criteria for determining criticality, including energy-system interdependencies and impact thresholds.

2. Security and Risk-Management Requirements

- Reinforces that OES must implement "appropriate and proportionate" technical and organisational measures (TOMs) to manage risks to network and information systems.
- Areas of focus include:
 - Asset management and configuration control
 - Supply-chain cyber-security controls
 - Resilience of operational technology (OT) and industrial-control systems (ICS)
 - Patch management, vulnerability assessment and protective monitoring
- Guidance aligns TOM expectations with NCSC and government standards, including secure-by-design principles.

3. Incident Reporting and Notification Duties

- Clarifies thresholds for reporting "substantial incidents" to Ofgem and the UK Computer Security Incident Response Team (CSIRT).
- Provides timelines and content requirements for incident submissions, including impacts on availability, continuity of supply or safety.
- Reinforces the expectation for near-miss reporting where system vulnerabilities could have resulted in significant disruption.

4. Governance, Oversight and Documentation



LEGISLATION UPDATE

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- OES must maintain documented governance structures demonstrating board-level accountability for NIS compliance.
- Requires risk registers, evidence logs, audit reports and security-controls documentation to be kept up to date.
- Ofgem may request documentation at any time, and the guidance clarifies what constitutes sufficient evidence.

5. Compliance Assessment and Enforcement

- Outlines Ofgem's supervisory approach, including:
 - Planned compliance assessments
 - Reactive investigations following incidents
 - Use of improvement notices and enforcement action
- Confirms that financial penalties for non-compliance remain available under the NIS Regulations.

6. Supply-Chain and Third-Party Risk Management

- Updates expectations for OES to assess and manage risks relating to third-party service providers, software suppliers and outsourced IT/OT services.
- Encourages alignment with government-wide supply-chain cyber-security standards.

7. Alignment with UK Cyber-Resilience Policy

- Integrates lessons and expectations from the Government Cyber Action Plan (January 2026) and emerging standards under the Cyber Security and Resilience Bill.
- Encourages cross-sector consistency and improved information sharing between energy-system operators and government bodies.

Purpose and Context

The guidance is part of the UK's ongoing programme to strengthen critical-infrastructure resilience and ensure effective implementation of the NIS Regulations 2018.

It responds to increasing cyber threats against national infrastructure and emphasises better governance, improved technical security measures and enhanced supply-chain assurance.

The updates also ensure coherence with broader government cyber-security efforts, including the Government Cyber Action Plan and updated secure-by-design expectations.

Implications for Stakeholders

- **Operators of Essential Services (OES):**
 - Must update risk-management approaches, governance documentation and security controls in line with revised regulatory expectations.
 - Need to ensure incident-response processes meet updated reporting thresholds and timelines.
- **IT/OT, Cybersecurity and Engineering Teams:**
 - Required to implement strengthened technical-security measures and maintain evidence for regulatory audit.



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- Must review and update supplier-risk assessments and contractual controls.
- **Compliance and Regulatory Affairs Teams:**
 - Should revise NIS compliance frameworks, update assurance processes and prepare for Ofgem scrutiny.
- **Third-Party Service Providers:**
 - May face increased oversight and contractual requirements where services support essential energy-system functions.

HEALTH & SAFETY

Building Safety Regulator (Establishment of New Body and Transfer of Functions etc.) Regulations 2026 (SI 2026/20)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom (England)

Commencement: 22 January 2026 (with staged transfers continuing into 2026)

Amends: Gives effect to the Building Safety Act 2022 by formally establishing the Building Safety Regulator (BSR) as an independent statutory body within the Health and Safety Executive (HSE) and transferring defined building-control and safety-oversight functions

Summary

The Regulations establish the Building Safety Regulator (BSR) as a new statutory body and transfer legal duties, powers and functions from existing building-control authorities and oversight structures.

It operationalises the next stage of post-Grenfell reforms by clarifying the Regulator's remit, governance, enforcement responsibilities and powers to oversee higher-risk buildings, building-control competence and systemic safety standards.

Key Provisions

1. Formal Establishment of the Building Safety Regulator

- Confirms the BSR's legal status as a statutory body hosted by HSE.
- Specifies the Regulator's core functions:
 - Overseeing the safety and performance of all buildings
 - Implementing the new regulatory regime for higher-risk residential buildings
 - Leading competence and oversight of building-control professionals
 - Developing building-safety standards and guidance

2. Transfer of Functions from Existing Bodies



LEGISLATION UPDATE

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- Transfers certain building-control responsibilities from local authorities and Approved Inspectors to the BSR.
- Includes powers relating to:
 - Registration and oversight of building-control professionals
 - Competence assessments and disciplinary action
 - Audit and assurance of building-control bodies

3. Duties in Relation to Higher-Risk Buildings

- The BSR becomes the lead regulator for high-rise residential and other defined higher-risk buildings.
- Responsibilities include:
 - Gateways oversight for design, construction and occupation
 - Safety-case reviews
 - Mandatory reporting of structural and fire-safety risks
 - Enforcement against accountable persons failing to manage building safety

4. Regulatory Powers and Enforcement

- The Regulations confirm the BSR's powers to:
 - Issue compliance and stop notices
 - Conduct inspections and investigations
 - Require documentation, safety reports and evidence
 - Take enforcement action where systemic failings or risk-management issues are identified

5. Governance, Accountability and Reporting

- Requires the BSR to follow HSE governance structures, with statutory reporting lines to the Secretary of State.
- Establishes advisory committees on building safety, industry competence and resident engagement.
- Sets expectations for transparent reporting on performance, regulatory interventions and emerging safety risks.

6. Transitional Provisions

- Provides arrangements to transition from the existing building-control regime to the new registration and competence system.
- Existing building-control approvals, certificates and enforcement actions remain valid during the transition period.
- Ensures continuity of oversight so that ongoing construction and refurbishment projects are not disrupted.

Purpose and Context

These Regulations form a central part of the UK's reform of building safety following the Grenfell Tower tragedy.



LEGISLATION UPDATE

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Their purpose is to create a unified, competent and authoritative regulator responsible for systemic building-safety oversight.

They also support improved resident safety, stronger enforcement powers, higher standards for building-control bodies, and a clear, accountable regulatory structure for higher-risk buildings.

Implications for Stakeholders

- **Dutyholders, Principal Designers and Principal Contractors:**
 - Must ensure compliance with BSR gateway requirements, documentation standards and competency expectations.
- **Accountable Persons and Building Owners:**
 - Need to maintain safety cases, resident-engagement strategies and mandatory occurrence reporting for higher-risk buildings.
- **Building-Control Bodies and Professionals:**
 - Must register with the BSR, meet competence standards and prepare for increased oversight.
- **Developers and Construction Organisations:**
 - Should review project planning, gateway submissions and risk-management processes to ensure alignment with BSR expectations.
- **Residents and Tenant Bodies:**
 - Benefit from strengthened routes for raising concerns and increased transparency on building safety.

Infrastructure Planning (Business or Commercial Projects) (Amendment) Regulations 2026 (SI 2026/13)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: England and Wales

Commencement: 8 January 2026

Amends: Infrastructure Planning (Business or Commercial Projects) Regulations 2013

Summary

These Regulations amend the Infrastructure Planning (Business or Commercial Projects) Regulations 2013 to add **data centres** to the prescribed categories of business or commercial projects eligible for direction into the **Nationally Significant Infrastructure Projects (NSIP)** regime under section 35 of the Planning Act 2008.

This change allows certain large-scale data-centre developments to be considered nationally significant and therefore consented via the Development Consent Order (DCO) process rather than standard town-and-country planning routes.

Key Provisions



LEGISLATION UPDATE

January 2026

1. Addition of Data Centres to Prescribed Project Types

- The Schedule to the 2013 Regulations is amended to insert a new category: “10. Data centres.”
- This formally recognises the strategic and economic importance of hyperscale and large commercial data-centre developments.

2. Eligibility for Direction Under Section 35

- Developers of qualifying data-centre projects may request that the Secretary of State “direct” the project into the NSIP regime.
- A direction can only be issued where the Secretary of State considers the project to be of national significance.

3. Implications for the Planning Process

- Data-centre projects directed into the NSIP process require a DCO, involving:
 - Preparation of Environmental Impact Assessments
 - Statutory consultation
 - Examination by the Planning Inspectorate
- The DCO process may offer greater certainty and alignment with national infrastructure priorities.

4. Policy Rationale

- The change follows government recognition of data centres as critical national infrastructure, supporting digital services, AI development and economic resilience.
- It aligns the planning system with the UK’s digital-infrastructure strategy and ensures appropriate scrutiny and coordination for high-impact developments.

Purpose and Context

The amendment reflects the government’s intention to modernise the infrastructure-planning framework to accommodate rapidly expanding digital-infrastructure needs.

By enabling large-scale data-centre projects to access the NSIP regime, the Regulations:

- Support delivery of nationally significant digital capacity
- Reduce planning delays for strategic projects
- Ensure robust environmental, technical and community-impact assessments
- Align with the government’s industrial strategy and designation of data centres as essential infrastructure

Implications for Stakeholders

- **Developers and Data-Centre Operators:**
 - Must assess eligibility for the NSIP route and prepare for the more formal DCO process where applicable.
 - Should anticipate greater scrutiny around environmental, energy-use and resilience impacts.



LEGISLATION UPDATE

January 2026

- **Local Planning Authorities:**
 - May see fewer large-scale data-centre applications through standard planning channels if projects are directed to the NSIP regime.
- **Consultants and Planning Advisors:**
 - Need to update project strategies, environmental assessments and stakeholder-engagement plans to reflect the revised Regulations.
- **Infrastructure and Digital-Technology Sectors:**
 - Benefit from a clearer, nationally aligned route for progressing data-infrastructure projects.

The Chemicals (Health and Safety) and Genetically Modified Organisms (Contained Use) (Amendment) (EU Exit) Regulations (Northern Ireland) 2026 (SR 2026/9)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: Northern Ireland

Commencement: 15 January 2026

Amends:

- The Chemicals (Health and Safety) (Amendment etc.) (EU Exit) Regulations
- The Genetically Modified Organisms (Contained Use) Regulations (Northern Ireland) 2015
- Related retained-EU derived statutory instruments applying in NI under the Windsor Framework

Summary

This statutory rule updates Northern Ireland's chemicals and GM-containment legislation to ensure continued operability under the post-EU Exit regulatory framework.

The changes align NI-applicable requirements with ongoing EU regulatory updates where required by the Windsor Framework, while ensuring consistency with GB-wide health and safety legislation in areas not subject to EU alignment.

Key Provisions

1. Updates to Chemicals Regulation Alignment Requirements

- Revises references to EU chemicals legislation to reflect the most recent EU amendments applying in Northern Ireland.
- Ensures continued recognition of specific EU-level harmonised classifications and chemical-safety standards required under the Windsor Framework.
- Updates definitions, terminology and cross-references to remove ambiguity following retained-EU law revisions.

2. Amendments to Duties for Manufacturers, Importers and Downstream Users



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- Clarifies notification obligations for substances placed on the NI market where EU-aligned requirements apply.
- Updates requirements for maintaining safety data sheets, classification records, and technical documentation.
- Introduces revised thresholds or criteria for notification and reporting, consistent with EU amendments applicable in Northern Ireland.

3. Genetically Modified Organisms (Contained Use) Updates

- Amends references and procedural details in the Contained Use regime to ensure compatibility with post-EU-Exit legislation.
- Aligns risk-assessment, containment-level and notification duties with updated EU guidance applicable to NI.
- Updates competent-authority functions and reporting processes for contained-use activities.

4. Competent-Authority and Enforcement Provisions

- Clarifies enforcement responsibilities of the Health and Safety Executive for Northern Ireland (HSENI).
- Provides updated powers for inspections, information notices and enforcement action to ensure compliance with revised EU-aligned requirements.
- Ensures enforcement processes remain consistent with both GB frameworks (where divergence is permitted) and EU-aligned obligations (where required).

5. Transitional Arrangements

- Organisations are permitted to use previous templates, forms and classification references for a defined transitional period.
- Transitional provisions apply to:
 - Classification changes
 - SDS updates
 - GM-containment notifications submitted before commencement
- After transition, organisations must fully adopt the updated references and requirements.

Purpose and Context

The amendments ensure that Northern Ireland's framework for chemical safety and contained-use GM activities remains legally coherent, up to date and enforceable post-EU Exit.

They balance:

- Alignment with EU legislation under the Windsor Framework, and
 - Consistency with GB-wide occupational health and safety legislation where divergence is permitted.
- The changes maintain high safety standards while supporting continued trade and regulatory operability.

Implications for Stakeholders



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- **Manufacturers, Importers and Distributors:**
 - Must ensure chemical classifications, labels, SDSs and technical documentation reflect the updated requirements.
 - Required to review EU-aligned obligations that continue to apply in Northern Ireland.
- **Laboratories and Facilities Using GMOs (Contained Use):**
 - Must update contained-use notifications, risk assessments and containment-level documentation.
 - Ensure compliance with updated definitions and procedural rules.
- **Health and Safety, Environmental and Quality Teams:**
 - Should review chemical-management procedures, SDS inventories, classification records and GM-containment protocols.
 - Must update internal policies to reflect revised NI-specific duties.
- **Compliance and Regulatory Affairs Teams:**
 - Need to monitor ongoing EU and GB updates to understand divergence and alignment impacts under the Windsor Framework.

The Building Safety Levy (England) Regulations 2025 (SI 2025/1236)

**Changes in the
legal register**

☒ yes ☐ no

Jurisdiction: England

Commencement: 1 January 2026

Amends: Implements powers under the Building Safety Act 2022 to introduce a levy on certain new residential developments

Summary

The Building Safety Levy (England) Regulations 2025 establish a mandatory levy on eligible new residential building projects in England.

The levy is intended to contribute to the cost of building-safety remediation across England, ensuring developers make a financial contribution toward rectifying historical building-safety failures.

Key Provisions

1. Application of the Levy

- Applies to new residential developments, including:
 - Blocks of flats
 - Purpose-built student accommodation
 - Mixed-use schemes containing residential units
- Certain categories are exempt (e.g. affordable housing, NHS or care facilities, small developments below defined thresholds).



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2. Levy Calculation and Rates

- Levy amounts are calculated using:
 - Rate per square metre of residential development, or
 - A fixed-charge mechanism where applicable.
- Rates vary by local-authority banding, reflecting regional property-value differences.
- The Secretary of State may revise levy rates annually.

3. Liability and Payment Requirements

- Developers are liable for the levy.
- Payment must be made at specified stages, typically:
 - Prior to commencement, or
 - In phased payments aligned to construction milestones.
- Failure to pay may result in withholding of building-control approval or enforcement action.

4. Administration and Evidence Requirements

- Developers must submit:
 - Development-details forms
 - Floor-area calculations
 - Evidence supporting claimed exemptions
- Local authorities or designated collection bodies verify submissions and collect payments.

5. Powers of Enforcement

- Authorities may:
 - Issue levy-payment notices
 - Impose surcharges for late or inaccurate submissions
 - Refuse to sign off completion certificates where levy obligations remain outstanding
- Liability may be pursued through civil-debt recovery where required.

6. Interaction with Other Building-Safety Duties

- The levy operates alongside the Building Safety Act 2022's gateway requirements.
- Developers must satisfy levy obligations to progress through Gateway 2 or Gateway 3 in higher-risk building processes.

Purpose and Context

The levy forms part of the government's long-term building-safety funding strategy following the Grenfell Tower tragedy.

Its objectives are to:

- Ensure developers contribute to the costs of historic building-safety remediation
- Encourage higher building-safety standards across the industry



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- Provide a more equitable funding mechanism for safety improvements without relying solely on leaseholders or taxpayers

Implications for Stakeholders

- **Developers and Housebuilders:**
 - Must budget for levy liabilities and update financial modelling.
 - Should review project pipelines to identify developments affected from 2026.
- **Planning and Building-Control Teams:**
 - Need to integrate levy-assessment steps into approval processes.
 - Must verify compliance before allowing progression to construction or occupation stages.
- **Construction and Commercial Teams:**
 - Should update procurement, costing and contract documentation to include levy obligations and assumptions.
- **Finance and Compliance Teams:**
 - Must track levy-payment deadlines, maintain evidence for exemptions, and update internal governance procedures.