

## London Chamber of Commerce and Industry

### **Make Work Pay: Consultation on Fire and Rehire: changes to expenses, benefits, and shift patterns – Response to consultation.**

Submitted on 30 March 2026

#### **About the London Chamber of Commerce and Industry**

London Chamber of Commerce and Industry (LCCI) is London's key hub for the business community, representing over 11,000 companies across all sectors and boroughs. Our membership includes microbusinesses, SMEs, large employers, universities, colleges and multinational firms, offering a broad and diverse perspective on the operational pressures shaping London's economy.

LCCI champions the interests of London's businesses and works to ensure their views are reflected in policymaking at local, regional and national levels. Our policy positions are informed by regular engagement with members, research and polling, and insights gathered through sector forums and committees representing companies operating across the capital's diverse economy.

Through this engagement, LCCI provides evidence and recommendations to government consultations, parliamentary inquiries, and policy reviews, helping to ensure that regulatory frameworks remain practical, proportionate, and supportive of business growth. Our response focuses on ensuring that proposed measures remain workable for employers while protecting employees against significant and material contractual changes.

#### **Overview**

LCCI recognises the importance of fair and transparent employment protections. At the same time, regulation must remain proportionate so that businesses can respond to economic pressures, fluctuating demand, and operational needs.

Measures related to dismissal and re-engagement should therefore focus on clearly defined, material contractual changes while avoiding unintended impacts on routine operational decisions. Protecting employees from significant detriment must be balanced with the need to maintain employers' ability to adjust expense policies, benefit structures, and shift patterns in response to operational realities.

Maintaining this balance will keep the proposed fire-and-rehire framework workable across different sectors and business sizes.

#### **Expenses and benefits**

Expenses and in-kind benefits are structured in many different ways across businesses and sectors, depending on organisational needs. In many instances, they serve as operational reimbursements or discretionary benefit schemes rather than being part of a core contractual pay.

LCCI believes it is important to maintain a clear distinction between contractual salary and operational arrangements, such as expenses, benefits, or incentive schemes. This distinction ensures that regulations focus on the core contractual pay

rather than operational policies or discretionary benefits. Extending further protections to these areas could introduce unnecessary administrative complexity and prevent organisations from adapting policies or benefit structures when operational conditions change.

In some cases, increased complexity around changing such arrangements could reduce employers' willingness to introduce or maintain certain benefits or expense policies. Ensuring that regulation remains proportionate, therefore, helps retain flexibility while appropriately protecting employees.

### **Shift patterns**

Shift arrangements vary widely across sectors and businesses and are often closely linked to operational requirements, service hours, and demand patterns. Many organisations rely on a degree of scheduling flexibility in order to manage staffing levels effectively and respond to changing conditions.

LCCI supports an approach that focuses protections on clearly defined and significant changes to working patterns, such as shifts between day and night or between weekday and weekend schedules. These types of changes can represent meaningful adjustments to employees' working arrangements and may require further consideration.

At the same time, protections should remain narrowly defined. Widening them to include routine scheduling adjustments could create unnecessary restrictions on daily workforce management. This is especially relevant for sectors with variable operating patterns or longer service hours, where shift arrangements are often adjusted to meet operational needs.

### **Implementation**

In these areas, having clear definitions and aligning with current employment frameworks will be essential to ensure the regulations are applied effectively in practice.

Employment arrangements vary significantly across organisations and sectors. Clear, proportionate, and administratively feasible regulatory approaches will promote consistent implementation and minimise uncertainty for both employers and employees. Offering illustrative examples or scenario-based guidance could further encourage consistent application across sectors, especially for smaller firms with limited HR resources.

LCCI supports a proportionate framework that concentrates on significant contractual changes while maintaining flexibility in operational matters. Distinguishing clearly between core pay, expenses, and routine scheduling practices will help ensure the regulations are workable across various sectors and business sizes.

We would be happy to discuss our submission in more detail. If you have any questions, please contact Igor Bartkiv (Policy and Research Manager at the LCCI) at [ibartkiv@londonchamber.co.uk](mailto:ibartkiv@londonchamber.co.uk).