

10-point action plan

01. **Scope.** Identify the legal entities in scope - those with at least 250 employees on 5 April.

02. **Responsibility.** Assign responsibility for work streams and tasks: i.e. calculating data, building narrative, website upload, director-level sign off.

03. **Employees.** Identify in-scope employees: agree protocols for deciding which workers / contractors / expats are in scope.

04. **Data.** Find out what data you have about pay and normal working hours and identify any gaps.
 - Decide approach to any difficult issues, e.g. absence, flexible benefit schemes, contractor data.

05. **Bonus.** Collate details of all bonus schemes, including cash bonuses, share options and LTIPs.
 - Decide approach to any difficult bonus issues e.g. what is in / out of scope, and whether your systems can capture the necessary data

06. **Bonus Timing.** If bonuses are normally paid in April, consider any impact on your hourly pay gap, and whether it is possible to move the payment date.

07. **Dry Run.** Carry out a dry-run of the six compulsory metrics and consider running further calculations to explore the potential for publishing alternative / adjusted metrics. Note that information gathered as part of this process may be disclosable. Take advice on how best to structure your approach if you wish to do this under legal advice privilege.

08. **Analysis.** Consider carrying out further analysis into the cause of the pay gap metrics, under legal advice privilege as far as possible and whether to conduct a wider equal pay audit.

09. **Communications.** Start work on building your communications plan and future action plan:
 - Will you publish a narrative alongside your data and what will the content be?
 - What measures are you already taking which may help narrow the gap?
 - Are there other measures you will take to help narrow the gap?
 - When will you publish the data on your website?
 - How will you present your data and what internal communications (both in the UK and more broadly) will you issue alongside or before you publish the data?

Is your data consistent with any other existing published data?

10. **Sign-off.** Undertake your final calculations, ensure that your data is signed off as accurate by a director, uploaded to your website and uploaded to the government website.

