GENDER PAY GAP · FROM REPORT TO PLAN

What belongs in your gender pay gap action plan

Reporting the number is the law. Closing it is a choice, and a credible plan shows exactly how you intend to.

Most published action plans list initiatives. The strongest ones do something harder: they use the data to find **where the gap is actually created**, dismantle the structural blockers behind it, and commit to action that is measurable and defensible. Use the five pillars below as a checklist for a plan that will stand up to a board, a regulator and your own people.

TEST 1

Is it **evidence-led**, built from data sliced finely enough to locate the cause?

TEST 2

Does it **remove blockers**, not just add initiatives on top of them?

TEST 3

Is every commitment **owned, measurable and time-bound**?

THE FIVE PILLARS

01 Diagnose beyond the headline number

A single percentage hides the cause. Slice the data until you can see where the gap is built: by level, function and working pattern.

- Analyse **part-time and full-time populations separately**; aggregate figures often mask where part-time roles concentrate by gender
- Map pay and bonus by level, function and tenure, not just organisation-wide
- Set **performance-rating distributions side by side by gender**; calibration is where ratings quietly drift
- Track the rate at which women move into, and through, each layer of leadership
- Read **leaver data and exit experiences** by gender; where and why women leave often explains the gap better than who you hire
- Slice by **intersectional demographics** where sample sizes allow; a manageable-looking gap can mask a near-total absence of women of colour from senior, revenue-generating roles

02 Audit your decision points for bias

Gaps accumulate at the moments where people are judged. Walk every gate and design the bias out of it.

- Review each decision point: shortlisting, interview, rating calibration, pay and promotion sign-off
- Document how **pay decisions are actually made** (starting salaries, uplifts, bonus and discretion), and find where discretion lets bias in
- Audit **total reward, not just salary**: equity, LTIPs, allowances and benefits, where the headline gap is often small but the wealth gap explodes at the point of equity allocation
- Provide **inclusive hiring training** to everyone who screens, interviews or selects, not only recruiters
- Replace unstructured judgement with **structured, criteria-based assessment**
- Where AI supports hiring or pay decisions, audit it for bias and keep a human sign-off on every outcome

03 Widen access and clear the path up

Closing the gap means opening doors in and removing what slows women's progression once they're through them.

- Rewrite adverts and criteria to **widen the funnel without hard-coding bias**
- Separate **internal progression blocks from external scarcity**: decide whether the gap reflects your own culture or a failure to attract women into high-paying technical functions
- Make development, stretch projects and sponsorship visible, and check they're allocated equitably
- Define the **leadership behaviours you reward**, then test who those behaviours advantage
- Build **succession planning and talent pools** that deliberately name and develop women for the next role up
- Make senior women visible as **role models**, and hold leaders accountable for modelling inclusive behaviour day to day
- Set transparent progression criteria so advancement isn't a matter of who happens to be noticed

04 Make flexibility and family policies real

Policies on paper close nothing. Uptake, and what happens after it, is what moves the number.

- Measure **who actually uses** flexible and family-friendly policies, by gender and by level
- Examine **return-to-work experiences**; the maternity and return window is where many gaps widen
- Ensure part-time and flexible workers remain in scope for promotion and progression
- Normalise flexible working at senior levels so it carries no career penalty

05

Listen, then dismantle the blockers

The metrics tell you where the gap is; your people tell you why. Then govern the plan so it actually moves.

- Run **listening groups** and read lived experience alongside the quantitative data
- Ask women directly how they **perceive progression routes**, and what would genuinely unblock them in future
- Separate **initiatives** (added on) from **blockers** (built in), and prioritise removing the blockers
- Give every commitment an owner, a target and a timeline so the plan is governed, not aspirational
- Tie governance to **Board and RemCo oversight**, and link executive remuneration to delivering the milestones; the plan moves fastest when bonuses depend on it
- Communicate the plan **transparently to staff**: name where the business is falling short and set out how people can hold leadership to account
- Keep an evidence trail so each decision is fair, defensible and ready to be measured next year

WORKING WITH JEN

Turn this checklist into a plan that holds up

Jen Davidson designs AI-inclusive recruitment systems that widen the talent funnel, audit bias in real time and make selection decisions defensible, fair and fast, for FTSE 100s and fast-growth SMEs alike.

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Aligned to the UK Government Equalities Office guidance, *Closing your gender pay gap*, at gov.uk. This guide is a planning aid, not legal advice. © Working with Jen.