



# Fair Pay Policy

Version 1.0

July 2021

## Version Control

Version	Owner	Reviewer	Changes	Approval date	Next Review
1.0	Monica Whitefield	Lyca Amichia	Initial version or first version uploaded on portal - see ESG share for historical information	07/2021	01/2022

## Objectives and purpose

Newable is committed to the principle of equal opportunities and equal treatment for all staff and workers, regardless of sex, race, religion or belief, age, marriage and civil partnership, pregnancy and maternity, sexual orientation, gender reassignment, or disability.

This policy is intended to set out how Newable will demonstrate its commitment to equal pay.

## Policy

### Our commitment

Legally, men and women must receive equal pay for:

- the same or broadly similar work;
- work rated as equivalent under a job evaluation scheme; or
- work of equal value.

Equal pay means all forms of contractual remuneration (including bonus payments, overtime rates, pension benefits and holiday pay), and non-cash contractual benefits.

Newable aims to ensure that it operates a fair and transparent pay system based on objective criteria and free from gender bias. We will do this by:

- preparing an annual gender pay gap report to identify any differences in the average and median pay between male and female workers, and publish this information on our website;
- providing training for all managers who are involved in salary reviews on equal pay issues;
- informing individuals how their pay has been determined in each salary review; and
- treating any grievance in relation to equal pay as a priority.

## Data protection

Newable processes personal data collected during the preparation of its gender pay gap report in accordance with its Data Protection Policy. In particular, data collected in the preparation of a gender pay gap report is held securely and accessed by, and disclosed to, individuals only for the purposes of operating a fair and transparent pay system. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the organisation's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under Newable's disciplinary procedure.

## Complaints

If an individual considers that they are not being paid equally to another member of staff of the opposite sex for the same or similar work, for work rated as equivalent (following a job evaluation study) or for work of equal value, they should raise their concerns in the first instance with their line manager and/or HR. Hopefully raising concerns in this informal way may resolve the issue.

If informal discussions do not resolve the matter to the individual's satisfaction, they

should write to Lyca Amichia, Head of HR setting out their concerns in accordance with Newable's grievance procedure, contained in the staff handbook.

Details of any complaints regarding equal pay will be retained confidentially for monitoring purposes.

## **Responsibility**

The Chief People Officer is responsible for equal pay within Newable and will review and ensure compliance with this policy at regular intervals.