Gender Pay Gap Measurement and Monitoring Policy

1. Purpose

To establish a consistent process for measuring and monitoring gender pay differences and following up on unjustified gaps.

2. Scope

This policy applies to remuneration data for employees across departments, designations, grades and employment categories, subject to lawful data protection and confidentiality requirements.

3. Definitions

- **Reference date:** The date fixed each year by the University for extracting remuneration data for analysis.
- **Gender pay gap:** The difference between average (mean and median) remuneration of women and men, expressed as a percentage using a documented calculation method.
- **Comparable group:** Employees grouped using relevant factors such as designation, grade, role, employment type, working hours and other job-related characteristics.

4. Policy Statement

VISTAS commits to periodically measure and monitor gender pay equity using payroll information and a documented methodology. The analysis shall distinguish overall differences from differences within comparable roles and shall not assume that an observed gap is automatically discriminatory or automatically justified.

5. Policy Principles and Commitments

- A gender pay analysis shall be conducted at least annually, subject to availability and lawful use of reliable data.
- The methodology shall specify the reference date, employee population, pay components, calculation method, exclusions and limitations.
- At minimum, the analysis shall report mean and median remuneration by gender overall and, where data permits, by comparable designation or grade.
- Results shall be interpreted in context, including designation, experience, qualifications, working hours, employment type and other legitimate job-related factors.
- Groups too small to protect identity shall be combined or not separately reported.
- Unexplained differences shall be investigated and recommendations for corrective action submitted to the Competent Authority.
- Year-on-year results shall be compared where consistent data is available. No claim of zero gender pay gap shall be made unless supported by analysis.

6. Implementation Procedure

1. Human Resources shall fix the reference date, employee population, pay components and calculation method before each annual review.
2. Human Resources and Finance shall validate the completeness and accuracy of the payroll data.

3. Finance shall calculate the agreed mean, median and relevant comparable-group measures.
4. Human Resources shall document data limitations, exclusions and contextual factors.
5. Material or unexplained differences shall be reviewed using consistent job-related criteria.
6. A confidential report shall be prepared with findings, recommendations, responsible offices and follow-up dates.
7. The report shall be placed before the Competent Authority and a non-identifying summary may be shared with employees where appropriate.

7. Roles and Responsibilities

Role	Responsibility
Human Resources	Define employee groups, lead the analysis and interpret findings.
Finance	Provide validated payroll data and calculations.
Designated data-protection officer / authority	Advise on lawful access, confidentiality and retention.
Competent Authority	Review findings and approve follow-up actions.

8. Records and Supporting Evidence

- Approved measurement method and report template
- Dated annual gender pay analysis
- Documented limitations and exclusions
- Confidential review findings
- Action tracker and follow-up records
- Non-identifying staff communication, where issued

9. Review and Amendment

This policy shall be reviewed at least once every three years, or earlier if applicable law, University structures, identified risks or implementation reviews require amendment. The review date and approved amendments shall be recorded.

Created / Revised on: _____

Approved by: _____ Date: _____

Signature / Seal: _____