

Race & Disability Pay Gap Reporting Policy

1. Policy Statement

SeenEm® is committed to equality, transparency and fairness in pay and employment practices. We recognise the importance of addressing pay disparities relating to **race and disability** and support the principles underpinning the UK Government's ongoing consultations on **Race and Disability Pay Gap Reporting**.

This policy sets out SeenEm®'s approach to compliance readiness and future reporting obligations once statutory requirements are introduced.

2. Current Status

At present:



UK race and disability pay gap reporting is **subject to government consultation**



There is **no statutory obligation** to publish race or disability pay gap data



Reporting requirements, thresholds and methodologies are **not yet finalised**

SeenEm® will monitor legislative developments closely and implement reporting processes once legal duties are confirmed.

3. Scope

This policy applies to:



All employees (once employed)



Directors and officers



Workers and agency workers



Contractors and consultants (where relevant to reporting scope)

It covers all aspects of pay, reward and employment practices.

4. Legal and Regulatory Context

This policy is aligned with:



Equality Act 2010



Employment Rights Act 1996



UK Government consultations on Race and Disability Pay Gap Reporting



Future secondary legislation anticipated to mirror gender pay gap reporting frameworks

5. Commitment to Fair Pay

SeenEm® is committed to:



Equal pay for equal work



Pay decisions based on role, responsibility, experience and performance



Transparent and objective reward structures



Eliminating unlawful discrimination in pay and progression

6. Data Collection Principles

Once reporting obligations apply, SeenEm® will ensure that:



- Data collection is lawful, fair and transparent
- Disclosure of race or disability information is voluntary
- Data is handled sensitively and confidentially
- Aggregated data is used for reporting purposes only

All processing will comply with **UK GDPR** and the **Data Protection Act 2018**.

7. Disability-Related Considerations

SeenEm® recognises that disability data is particularly sensitive.

Accordingly:



- Disclosure will never be mandatory
- Reasonable adjustments will be respected
- No individual will be disadvantaged for choosing not to disclose

8. Future Reporting Commitments

Once statutory thresholds and methodologies are confirmed, SeenEm® will:



- Calculate race and disability pay gaps using the prescribed methodology
- Publish required reports within statutory deadlines
- Provide explanatory narratives where required
- Take proportionate action to address identified disparities

9. Action Planning

Where pay gaps are identified, SeenEm® will:



Analyse contributing factors



Review recruitment, progression and reward practices



Implement reasonable and proportionate actions to support equality

10. Transparency and Communication

SeenEm® is committed to transparency and will:



Communicate pay gap information clearly once reporting applies



Engage openly with stakeholders on equality matters

11. Review and Monitoring

This policy will be:



Reviewed annually



Updated immediately upon the introduction of statutory race or disability pay gap reporting requirements

12. Review and Approval

This policy is approved as a **compliance-readiness policy** and will transition to an active reporting policy once statutory obligations apply.



Approved by: The Board of SeenEm®

Status: Policy in place – statutory reporting not yet in force

Review frequency: Employment of Staff, Annual or upon legislative change

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