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Gender Action Plan

Supporting the Women's Empowerment Principles
Version 2.0 | Issued 8 November 2026 | First 365 days from adoption

1 Decision and commitments

Finaffairs will use its employment practices, consulting advice, recruitment services and purchasing power to advance women's opportunities and prevent discrimination, harassment and exploitation. This revision replaces Version 1.0. It establishes immediate protection measures, fixed outcome commitments, costed delivery and a separate approval of baseline-dependent targets.

The plan supports Finaffairs' Statement of Sustainability Commitment. The current controlled title is "Statement of Sustainability Commitment". Its reviewed text commits to fair recruitment but does not expressly promise gender-balanced shortlists; the client recruitment standards in section 8 are new commitments in this plan, rather than a claim that the earlier statement already contains them.

Fixed outcomes authorised at adoption

Outcome	First year commitment and assessment
O1 Pay equity	No overdue substantiated sex-related pay inequity at Day 365. Each confirmed inequity receives a decision within 10 working days of the finding and correction within 30 calendar days, or sooner where required; obtain legal advice on arrears and other remedies.
O2 Skills and progression	At least 75% of mentoring participants with a completed review demonstrate one pre-agreed competency improvement or expanded responsibility by Day 365. Use before-and-after assessment; show the numerator and denominator internally.
O3 Community capability	At least 70% of assessed community learners improve their matched pre/post skills score by 20 percentage points. Retain non-completion figures; do not present attendance as an employment outcome.
O4 Safe participation	At least 80% of participating staff confirm that they know an independent reporting route and believe they can raise concerns without retaliation at Days 180 and 365. Offer private interviews if an anonymous survey is not credible. Address every retaliation allegation immediately.
O5 Fair access and economic opportunity	Measure shortlist-to-interview, interview-to-offer, promotion and leaver rates, leadership representation and paid spend with verified women-owned businesses. Direction and numeric improvement targets require the separate Day 120 approval in section 11.

O2 and O3 must also disclose assessment coverage and attrition: aim for at least 80% of enrolled participants to have matched evidence, so that selective assessment cannot inflate results. No cohort will be invented to meet a denominator. Where no eligible cohort exists, report not applicable and explain the missed opportunity or alternative action.

Dates and approval boundary

Day 0 is the single adoption and effective date entered in section 11; Day 30 means 30 calendar days after it. All later milestones use calendar days, with reviews at Days 120, 210, 300 and 365. "Working day" applies only where expressly stated. Existing legal and contractual duties apply now; neither approval nor a later milestone defers them. The WEPs decision has a fixed date of 22 November 2026.

The adoption signature approves this version, its fixed commitments and budget assumptions. It does not approve any future target value. Actual workforce composition, policies, resource quotations, supplier status and WEPs registration remain to be verified.

2 Immediate protection and current legal position

All immediate-control deadlines in this section run from issue on 8 November 2026, not from a later adoption date.

Public sources checked on 8 November 2026 confirm that Great Britain's stronger sexual-harassment prevention and third-party harassment duties took effect on 30 October 2026. The earlier preventive duty began on 26 October 2024. Employers must now take all reasonable steps to prevent sexual harassment and must not permit third-party harassment within the statutory provisions. These duties extend to work at client sites, travel, events and online interactions. This is source verification, not a solicitor's opinion. [R1–R3]

Immediate controls from issue

Check today whether an adequate policy, risk assessment, reporting route and response procedure already operate. If missing or inadequate, issue interim instructions immediately: harassment, discrimination, retaliation, sexual exploitation and abuse are prohibited; concerns may bypass the line manager and founder; preserve evidence, protect affected people and take action against third-party misconduct. Do not wait for policy drafting or group adoption.

For every new or continuing client-site assignment, the delivery lead must assess harassment and safeguarding risks before the next deployment or visit. Agree client contacts, conduct expectations, private reporting, safe travel and removal from unsafe situations without penalty. Stop or redesign work where risk cannot be controlled. Apply an immediate conduct briefing, then role-specific training after the procedure is issued: managers within 14 calendar days of issue and all active staff within 30 calendar days of issue. Brief new starters before deployment and provide training within 10 working days.

Confidential routes and independent authority

The published Business Ethics page currently directs reports to info@finaffairsconsulting.com. A general inbox must not be described as a confidential harassment channel. Within 2 working days, restrict access to any sensitive reports already received, prohibit general forwarding and tell staff who can access them. Within 7 calendar days, commission and test an externally controlled route and publish the actual contact details; no fictitious email address is created by this plan. [R4]

Until that route is live, offer a private conversation with an unconflicted nominated person and direct access to an independently instructed adviser. If those appointments are not made, record the gap immediately, give direct client or external reporting options and suspend high-risk deployment; a missing channel is not a reason to postpone safety action. The public route must be updated only after access and conflict tests pass. Do not promise absolute confidentiality or anonymity.

Allegations involving UNDP or another client

The safeguarding lead must check each contract's allegation-reporting clauses and enter the required recipient, trigger, deadline and deputy in a register before work starts. On awareness of a potentially reportable allegation: protect safety; preserve records; notify the client immediately where required, otherwise within an internal maximum of 24 hours after awareness, subject to applicable law and any shorter contract deadline. Notify on allegation, not after substantiation. Share only necessary information through secure channels and apply survivor-centred safeguards without obstructing mandatory reporting.

For UNDP-linked sexual misconduct, include UNDP's Office of Audit and Investigations route at reportmisconduct@undp.org or its official reporting portal, plus the contract-designated contact. A client implicated in the allegation must not be the only recipient. The independent reviewer can notify directly if leadership is conflicted or fails to act. Log receipt, safety decisions and notifications; acknowledge staff reports within 2 working days. [R5]

Urgent professional review

Instruct a UK employment solicitor within 2 working days and obtain a written review within 7 calendar days covering the current duties, interim controls, client-site risks, confidentiality, reporting and positive action. Commission local advice for the other delivery jurisdictions. Lawyer confirmation has not been obtained; this is an outstanding action, not a completed assurance. Necessary protective action continues while advice is pending.

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3 Scope and shared decision making

The group operating standard covers Finaffairs-controlled work in the UK, Nigeria including Abuja, the US and Canada. Each employing or contracting entity must be identified and adopt the standard through its authorised representative. A jurisdiction register is due by Day 14; it must identify actual legal entities, work locations, local obligations, client duties and advisers. A country label is not proof of legal coverage.

Jurisdiction	Minimum application and local review
UK	Apply the Great Britain duties where applicable; check employment status, overseas work and any Northern Ireland exposure separately.
Nigeria and Abuja	Apply safeguarding, client-notification and fair employment controls immediately to Abuja-led delivery; verify the Nigerian contracting entity, employment, state/FCT, privacy and reporting requirements.
United States	Identify the employing entity and states of work before deployment; assess federal, state and local requirements, recruitment restrictions and privacy duties.
Canada	Identify the employing entity and province or federal jurisdiction; assess employment, human-rights, privacy and workplace harassment requirements.

Four operating roles and independent oversight

Role	Authority and accountability
Executive sponsor Dr Kazeem Olayimika Salaam	Authorises adoption and resources; makes the WEPs decision. Delegates routine delivery. Cannot close a complaint about himself, approve his own pay review or unilaterally alter independently reviewed findings.
Operations and People Lead Name at adoption	Combines coordinator, HR administration and safeguarding coordination. Maintains actions, channels and local adoption. Can pause deployment and obtain urgent advice; does not investigate a matter where conflicted.
Finance Lead Name at adoption	Validates payroll, supplier spend and cost records. Commissions the independent pay review and tracks remedial payments. Has no unilateral authority over the sponsor's pay.
Delivery and Academy Lead Name at adoption	Owns client assessments, recruitment mandate controls, learning and community delivery; project managers carry out checks under this role, rather than creating extra management posts.
Staff representative Chosen by Day 30	Elected or selected through a confidential staff process, with protected paid time. Helps choose priorities, co-develops Day 120 targets and reviews aggregate results. Staff dissent is recorded with the proposal.
Independent reviewer Appoint by 15 November 2026	External unconflicted employment/HR professional under written terms. Receives reports directly, secures evidence, initiates independent investigation, directs interim safety restrictions and challenges publication. May draw the delegated oversight allowance without founder approval for each referral.

The independent reviewer assesses the sponsor's pay through an external remuneration review, using an unconflicted accountant if needed. No proposed sponsor pay increase is implemented before that written review and approval by an unconflicted authorised corporate decision maker. If none exists, obtain legal advice on a valid independent approval arrangement and keep the increase on hold; do not label founder approval as independent.

A review group of Operations, Finance, Delivery, the staff representative and independent reviewer meets at Days 120, 210, 300 and 365. The reviewer signs off evidence quality and conflicted decisions; the staff representative co-signs target recommendations. Sponsor endorsement is additional, not a substitute. Unresolved dissent, overrides and legal constraints must be minuted. Names, deputy arrangements and reviewer terms must be entered in the appointment record before describing oversight as operational.

Resource booking at Day 0 must identify actual owners, time and funding. If capacity is short, defer discretionary advocacy or community expansion before safety, reporting, pay compliance or client obligations. Reforecast at every review.

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4 Costed and phased delivery

Planning assumptions are estimates, not supplier quotations or existing expenditure. N is the number of active employees receiving training. The illustration uses N = 25 solely for costing; the confirmed statement is fewer than 50 employees. Internal rates are opportunity-cost assumptions. Costs are in GBP, exclude recoverable VAT and require local currency and tax checks.

Internal resource	Hours in year one	Assumed rate	Cost at N = 25
Operations and coordination	70	£45/hour	£3,150
People and safeguarding work	60	£45/hour	£2,700
Finance and pay data	20	£60/hour	£1,200
Delivery and Academy	35	£70/hour	£2,450
Sponsor decisions	12	£100/hour	£1,200
Staff training	2 × N = 50	£40/hour	£2,000
Internal total	197 + 2N = 247	Blended	£12,700

The Operations and People Lead may perform the first two workstreams: 130 hours over the year, averaging about 11 hours monthly, with a heavier initial safety phase. Staff-representative consultation time is included in coordination; manager case handling is not assumed to be free.

External or direct cash cost	Assumption	Allowance
Employment and local legal triage	12 hours at £250; obtain scope and quotes	£3,000
Independent oversight and pay challenge	12 hours at £150; investigations excluded	£1,800
Training and secure reporting tools	Planning allowance	£400
Community delivery costs	Planning allowance	£500
Cash subtotal	Before contingency	£5,700
Contingency	20% of cash subtotal	£1,140
Planned cash envelope	Subject to actual quotes	£6,840

Total illustrative full economic cost is £19,540: £12,700 internal opportunity cost plus £6,840 planned cash. For another headcount, internal cost is £10,700 + £80N. Legal review across four jurisdictions and complex investigations may exceed these allowances. Budget limitations do not postpone legal duties, survivor support, mandatory reporting or pay remedies; those require urgent additional funding approval with independent escalation.

Phase	Internal hours at N = 25	Planned cash draw	Delivery focus
Issue to Day 30	70	£3,500	Safety, channels, legal triage, appointments and WEPs decision
Days 31 to 120	75	£1,500	Baseline, pay review and separate target decision
Days 121 to 240	55	£1,000	G10 discussions Day 150 and goals Day 180; G16 consultation Day 180; client, mentor and supplier rollout
Days 241 to 365	47	£840	Outcomes, community follow-up and annual review
Total	247	£6,840	No costs incurred are implied

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5 Leadership and fair treatment actions

Principle 1 High-Level Corporate Leadership

Action and accountable owner	Deadline and test	Evidence and outcome link
G01 Sponsor: record a dated WEPs decision; appoint roles and delegate decisions.	By 22 November 2026: decide whether to sign the official CEO Statement and authorise an application. If deferred, record reasons and a new decision date within 30 days.	Decision minute; signed statement only after actual signature. Approval as a signatory requires an application and WEPs confirmation. [R6]
G02 Operations: complete confidential assessment and staff consultation.	Baseline by Day 90; staff representative helps select priorities. Use the WEPs tool or documented equivalent without implying certification.	Assessment, sources, gaps and staff recommendations; feeds O1–O5.
G03 Review group: evaluate delivery and corrective decisions.	Days 120, 210, 300 and 365. First review follows baseline completion. This is the single governance review, not a second dashboard meeting.	One decision record per review, with independent challenge and staff dissent.

Principle 2 Treat All Women and Men Fairly at Work without Discrimination

Action and accountable owner	Deadline and test	Evidence and outcome link
G04 Operations and Delivery: standardise internal and client recruitment, role criteria and stage records.	Internal checklist from Day 30; client mandate controls from Day 60. Seek a qualified gender-balanced slate, using the decision rules in section 8.	Stage conversions, scoring and documented exceptions; O5.
G05 Finance: arrange independent equal-work pay review, including sponsor remuneration.	Review by Day 120; investigate ≥5% differences or recurring ≥3% differences, and any other credible inequity. Start on detection; remediation rules below.	Restricted comparator analysis, reasons and external review; O1. [R7]
G06 Operations: implement transparent progression, flexible work, caregiver and parental-return arrangements.	Review by Day 150; apply existing rights immediately. Track eligible pools, decisions and 6-month return cohorts.	Promotion and leaver rates; support outcomes; O5.

Pay investigation and correction rule

For each equal-work comparator group, examine basic pay and contractual benefits. Investigate immediately where a difference reaches 5%, a recurring difference reaches 3%, or any allegation or pattern suggests inequity. These EHRC audit triggers are not a permitted pay gap and do not excuse smaller differences. Document the recurrence across comparators or review periods; do not wait for a second annual review if a pattern already exists. [R7]

Complete initial fact-finding within 20 working days of detection, with reasons and an independently approved extension if needed. The 10-working-day decision and 30-calendar-day correction clocks start on the dated substantiated finding, not on plan approval. Finance records any arrears or other remedy on legal advice. Unlawful treatment receives prompt action regardless of the size of the difference; remuneration review cannot be delayed to Day 120 when a concern is already known.

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6 Health and development actions

Principle 3 Employee Health, Well-Being and Safety

Action and accountable owner	Deadline and test	Evidence and outcome link
G07 Operations and independent reviewer: put reporting, prevention and client notification into operation.	Immediate interim controls from issue; private route within 7 days; solicitor review within 7 days. Do not wait for the programme timetable.	Tested access, notification register and protected case log; section 2 and O4.
G08 Delivery: screen every assignment for third-party and safeguarding risks.	From issue, before the next new or continuing deployment. Check lone working, travel, power imbalances, online contact and community access.	Risk controls, client escalation and authority to pause; repeated concerns trigger independent review.
G09 Operations: train and provide individual health and well-being support.	Immediate briefing; managers within 14 days of issue; staff within 30 days of issue, after the procedure. Support guidance by Day 60; review at Days 180 and 365.	Knowledge and safe-speaking result O4; implementation of agreed support, not just attendance.

Support must address pregnancy and maternity risks, menopause symptoms, mental health, caring responsibilities and domestic abuse. Offer private discussion, flexible arrangements, medical or specialist referral, safe communications and agreed workplace adjustments; do not require disclosure to the whole team. For domestic abuse, agree safe contact and workplace safety without pressuring disclosure or automatically contacting an unsafe person. Put urgent protective arrangements in place immediately; an internal aim of 10 working days for routine agreed adjustments does not override earlier legal duties.

Reports receive fair investigation, non-retaliation and appeal through an unconflicted route. Acknowledge within 2 working days and set an initial case plan within 10 working days; do not promise a fixed final outcome. The reviewer checks retaliation risks after 7 and 30 days and at case closure. Complaint numbers alone never demonstrate success.

Principle 4 Education and Training for Career Advancement

Action and accountable owner	Deadline and test	Evidence and outcome link
G10 Operations and Delivery: discuss individual needs and record access to revenue work, training and leadership exposure.	Offer discussions by Day 150; agree development goals by Day 180. Statutory or contract-required training remains immediate.	Before/after competency rubric, eligible pools and opportunity decisions; O2 and O5.
G11 Delivery: run an accessible mentoring pilot with documented eligibility.	Design by Day 180; 4 sessions per participant by Day 330; outcome assessment by Day 365. Open pilot is the default.	O2: 75% demonstrate a pre-agreed improvement; assess at least 80% of the enrolled cohort.
G12 Delivery: allocate project leadership and speaking opportunities transparently.	From Day 150: record criteria, eligible staff, offers and acceptance for every project-lead appointment and funded development place.	Assignment progression and opportunity-to-selection conversion; O5.

Any women-only pilot requires a written positive-action assessment before launch: evidence of disadvantage, particular needs or underrepresentation; intended outcome; less restrictive alternatives; proportionality; duration; staff consultation; independent legal review and review date. Without that record, use open mentoring with tailored outreach and needs-based support. UK sections 158 and 159 rules must not be treated as equivalent; the mentoring exception does not authorise preferential hiring. [R8]

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7 Marketplace and community actions

Principle 5 Enterprise Development, Supply Chain and Marketing Practices

Action and accountable owner	Deadline and test	Evidence and outcome link
G13 Finance and Delivery: establish supplier ownership and remove access barriers.	Baseline by Day 90; sourcing and spend target separately signed at Day 120. Apply enhanced sourcing from Day 150 when the definition below is met.	Paid spend, awards and renewals with verified women-owned firms; O5.
G14 Operations: screen suppliers and flow down safeguarding and conduct clauses.	Immediate for high-risk new or continuing client delivery. Other new or renewed contracts by Day 180; routine low-risk review by Day 240.	Risk record, contract clauses, reporting deadlines and corrective evidence.
G15 Delivery: assess client advice and external materials for gender effects and stereotypes.	Client screening from Day 60; review all new courses and public campaigns from Day 180. Section 8 defines decisions and escalation.	Recommendations adopted, recruitment conversions and accessibility barriers removed; client register.

Definitions that trigger a decision

A women-owned business must be at least 51% owned by women and managed, independently controlled and operated by women. Verify certification scope or obtain an ownership/control declaration and proportionate supporting records; certification and self-declaration are distinct statuses. Count self-declared spend separately until verification. Women-led firms without this ownership/control test form a separate category. This internal rule draws on WEConnect criteria but is not a claim of certification. [R9]

Enhanced sourcing applies to a purchase with forecast annual spend of £2,000 or more, any consultancy subcontract, or an engagement lasting over 30 days. Seek at least one qualified women-owned option after documented market outreach; if none is found, record sources searched and reasons. Award on capability, quality and value without reserving the contract. High-risk suppliers are those with access to client staff, communities, personal data or premises, or those using subcontractors; safeguarding review applies regardless of value. Material for other contract controls means the enhanced sourcing threshold or high-risk test is met.

Principle 6 Community Initiatives and Advocacy

Action and accountable owner	Deadline and test	Evidence and outcome link
G16 Delivery: consult a university, professional or community partner and select a needs-based activity.	Consultation by Day 180, with a signed brief, adult participant scope, access support and assessment method before launch.	Evidence of need and partner safeguards; no assumed existing partnership.
G17 Delivery: deliver two learning activities and follow up outcomes.	Activities by Day 300; aim for 10 distinct women. Matched assessment and follow-up by Day 365.	O3: 70% of assessed learners gain 20 percentage points; report coverage and dropouts.
G18 Operations: publish evidence-based advocacy and learning.	One substantive update by Day 240 and an annual update at Day 365, subject to independent review.	Use consented examples and verified outcomes, not promotional attendance claims.

Project-design screening is required for every assignment in recruitment/search, workforce advice, public or development finance, public-sector reform, community-facing programmes or training design. Other projects receive a short scoping check; a no-impact decision needs written reasons. Marketing review covers every new campaign and course, not an undefined “relevant” subset.

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8 Client work and measurable influence

The Delivery Lead owns the following controls for Finaffairs-led and Abuja-led work. Agree the scope, client responsibilities and data access in the engagement letter. Advice cannot guarantee client adoption, but Finaffairs must record decisions and escalate harmful or unlawful instructions.

Service	Required analysis and deliverable	Outcome evidence
Recruitment and executive search	Record source pool, longlist, qualified shortlist, interviews, offers and hires. Aim for balanced representation among qualified candidates; use 40–60% as an outreach objective across slates with at least 5 candidates, not a selection quota. A smaller slate is reviewed case by case. Explain market constraints and additional outreach; never replace a better-qualified candidate solely to hit a percentage.	Stage-conversion differences; barriers removed; hires and client decisions. A gap over 10 percentage points between women's and men's comparable conversion rates triggers review, with counts and context.
Public finance and tax reform	Assess who benefits and bears burdens, service access, unpaid care, consultation and distributional effects of expenditure or revenue options. Where data permit, disaggregate results and recommend budget indicators.	Client-approved changes to budget design, service access or monitoring; track acceptance within 90 days of the final recommendation.
Development finance and enterprise advice	Assess women's access to finance, collateral, eligibility, procurement and enterprise support. Document constraints, consultation and accessible design choices.	Changes adopted to eligibility, outreach or financing processes; women-owned enterprise participation where the client lawfully provides data.
Programme and institutional advice	Include gender risks, beneficiary voice, safeguarding, accessible delivery and a results framework with sex-disaggregated measures where lawful. Allocate a responsible client owner for recommendations.	Recommendations adopted, beneficiary access or service outcomes where observable; report attribution limits and missing data.

Where a client refuses needed analysis or disclosure, document the limitation and obtain independent review before continuing; decline work requiring discrimination or suppression of a safeguarding report. No client outcome data are published without agreed authority, confidentiality review and adequate evidence. "Relevant client recommendation" means one included in an agreed deliverable with a named client decision owner and review date.

Principle 7 Measurement and Reporting

Action and accountable owner	Deadline and test	Evidence and outcome link
G19 Operations and Finance: establish the measurement definitions and baseline.	By Day 90: baseline pack with sources, denominators, missingness and separate sex/identity fields. Validate independently before target proposals.	Outcome register in section 9; no invented baseline.
G20 Operations: prepare one review dashboard.	First dashboard by Day 105; joint governance reviews at Days 120, 210, 300 and 365 under G03.	Avoid duplicate reviews; versioned data, decisions and staff feedback.
G21 Operations and reviewer: issue an annual progress statement.	By Day 365: independently checked summary, staff consultation and sponsor endorsement. Day 120 targets remain a separate signed schedule.	Public disclosure rules in section 10; publish actual WEPs status only.

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9 Outcome and indicator register

Baseline B90 means a validated pack due at Day 90, normally using the prior 12 months plus a dated workforce snapshot. Actual values remain unknown. D120 means a numeric proposal that needs a separate signature; adoption of this plan does not authorise the future value. Track counts and denominators internally; missing or zero-denominator results are not zero performance.

Measure and definition	Baseline	Target or decision rule	Frequency
Equal-work pay differences: review basic pay and each contractual benefit within job comparators; separately show median hourly pay gap.	B90 payroll and terms; first independent findings by Day 120.	O1: no overdue unremedied substantiated inequity at Day 365. Investigate ≥5%, recurring ≥3%, or any credible concern.	On detection; Days 120, 210, 300, 365.
Representation: women / defined workforce or leadership population; distinguish employees, personal-service workers, associates and board.	B90 snapshot and data basis.	D120: numeric direction and 365-day target for leadership and workforce, with available appointments and counts. No quota.	Snapshot at each review.
Shortlist and hiring: shortlisted / eligible applicants; interviews / shortlisted; offers / interviewed; hires / offers, by sex where lawful.	B90 prior mandates; separate client and internal hiring.	D120: stage targets. Review adverse conversion differences >10 percentage points; exact merit criteria remain decisive.	Every mandate; review aggregate.
Promotion and leavers: promoted / eligible pool; voluntary leavers / average cohort headcount. Record reasons voluntarily.	B90 prior year; note tiny cohorts.	D120: promotion and voluntary-attrition targets; investigate patterns and each credible discrimination concern.	At event and each review.
Mentoring: participants demonstrating an agreed competency gain or expanded role / participants with completed assessment.	Pre-pilot rubric; no assumed result.	O2: ≥75% outcome success; matched evidence for ≥80% enrolled. Record all non-completers.	Before pilot; Day 330 and 365.
Community learning: matched post-score minus pre-score; count distinct adults and assessment attrition.	Pre-activity score; no assumed result.	O3: ≥70% assessed gain ≥20 percentage points; ≥80% enrolled have matched evidence.	Each activity; follow-up by Day 365.
Safe speaking: staff who know the independent route and feel safe raising concerns / respondents.	Initial confidential check by Day 90.	O4: ≥80% at Days 180 and 365. Low response triggers private follow-up, not a claim of reassurance.	Days 90, 180, 365.
Women-owned supplier spend: verified qualifying spend / addressable third-party spend; exclude payroll, tax and intercompany transfers.	B90 spend, supplier control status and gaps.	D120: numeric spend and paid-award targets; self-declared and women-led spend shown separately.	Each review; annual total.
Client influence: recommendations accepted / documented recommendations due for client decision; record implementation separately.	B90 inventory, then engagement-level baseline.	D120: adoption target agreed against actual client mandates; follow up each decision within 90 days.	Each deliverable and 90-day check.
Parental return and retention: actual returns / due-to-return cohort; retained 6 months after return / returned cohort.	B90 leave cohorts; incomplete observation flagged.	D120: support and retention target where cohort exists; otherwise case-level assurance, no invented percentage.	On return and after 6 months.

Control indicators accompany outcomes: policy and channel tests, recruitment documentation, staff training, support requests, notification timeliness and supplier clauses. Do not substitute these activity measures for the results above. Pay-gap calculations require a positive valid comparator median; otherwise use case review and record not calculable.

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10 Data and public reporting rules

For UK Equality Act pay/equal-work analysis, “women” and “men” refer to female and male biological sex as interpreted by the Supreme Court, rather than gender identity. Keep any voluntary gender-identity information separate for inclusion and well-being work. Do not infer either from names, appearance or photographs, request GRC information, or assume payroll labels establish the correct legal data basis. Obtain specialist advice on a proportionate lawful method and protect all staff from discrimination, harassment and disclosure of sensitive history. [R10]

For Nigeria, US and Canada records, the local adviser must confirm the applicable data basis and permitted categories before collection or cross-border transfer. Keep jurisdiction definitions explicit; do not combine incompatible datasets. Publish the denominator and data coverage only where safe. Access to identifiable pay or case material is limited to authorised unconflicted handlers, with purpose, privacy notice, lawful basis, retention and security documented.

What the first public report will show

Publish the adopted policy, actual WEPs status, scope, aggregate completion of controls, independently checked outcome narrative, barriers, resources and next steps. Publish whole-workforce representation only if both the group and its complement have at least five people and the result cannot identify individuals; otherwise use a qualitative statement. Do not publish leadership, promotion, parental-return, case or pay breakdowns where small populations make identification likely. This is a risk rule, not a statutory threshold.

Provide independent assurance that restricted leadership, pay, progression and leave data were examined, whether actions remain open and whether fixed commitments were met. Do not call missing results successful. Community and supplier aggregates may be published only after consent/confidentiality and re-identification checks; confidential client mandates remain private. Pool periods only if meaningful and still safe; use secondary suppression so totals cannot reconstruct hidden cells.

Initial risk register

Risk and initial rating	Control and trigger	Owner and review
Founder dependency or conflicted decisions High	Independent authority, deputy, staff voice; pause sponsor pay increases without external review. Escalate any attempted override.	Independent reviewer Every decision and quarterly
Retaliation or unsafe reporting High	External tested route, restricted records and 7/30-day follow-up. Any alleged reprisal triggers immediate protective review.	Operations and reviewer On report; monthly route check
Third-party harassment or SEA High	Pre-deployment screening, client duties, stop-work power and allegation notification. Any uncontrolled risk stops deployment.	Delivery lead Each deployment and report
Data quality or incompatible categories High	Source checks, small-cohort review and separate sex/identity and country fields. Missing data block unsupported claims.	Finance and Operations Baseline and every report
Capacity or underestimated legal spend Medium	Booked hours, quotations and contingency; fund mandatory controls first and rephase discretionary work.	Sponsor and Finance Monthly cost review
Unlawful positive action High	Open pilot unless evidence, proportionality and legal review justify a restricted scheme. No automatic recruitment preference.	Operations and solicitor Before launch and Day 300
Client resistance or misleading attribution Medium	Agree analysis and decision owner; record refusals and adoption separately from implementation.	Delivery and reviewer Scoping and final report

Ratings are initial management judgements, not completed risk assessments. Confirm likelihood, impact, residual rating, named owner and next review by Day 30; add country and contract-specific risks. The register is reviewed alongside G03, with urgent risks escalated immediately.

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11 Adoption and separate target approval

A Adoption of this version

The approving executive adopts Version 2.0, fixed outcomes O1–O4, operating controls, scope and the cost assumptions in section 4. O5 measures are fixed now, but their numeric improvement values require Part B below. Immediate legal and contractual obligations are not conditional on signature. Neither this plan nor source checking constitutes employment-law clearance.

Executive: Dr Kazeem Olayimika Salaam, Founder and Managing Principal
Signature: _____ Adoption and effective date Day 0: _____

Operations and People Lead name: _____ Signature: _____
Finance Lead name: _____ Signature: _____
Delivery and Academy Lead name: _____ Signature: _____
Independent reviewer name and firm: _____ Acceptance date: _____
Staff representative selection date: _____ Name: _____

Legal instruction date: _____ Adviser and jurisdiction: _____
Written legal opinion received date: _____ Outstanding scope: _____
WEPs decision date, no later than 22 November 2026: _____
Decision and authorised next step: _____

B Separate Day 120 baseline and outcome target decision

Complete this schedule only after staff consultation and independent baseline review. Attach the actual values, legal assessment, evidence, resources and eligible opportunity counts. No cell below is approved by the Part A signature. If a proposal is deferred, record why, remedial action and a new approval date within 30 days; disclose the delay in the annual review.

Outcome measure	Validated baseline	Proposed Day 365 value	Decision and reasons
Workforce and leadership representation	To be completed	To be completed	Approve / revise / defer
Shortlist and hiring conversions	To be completed	To be completed	Approve / revise / defer
Promotion and voluntary-leaver rates	To be completed	To be completed	Approve / revise / defer
Verified women-owned paid spend and awards	To be completed	To be completed	Approve / revise / defer
Client recommendation adoption	To be completed	To be completed	Approve / revise / defer
Parental return and retention where observable	To be completed	To be completed	Approve / revise / N/A

Staff representative recommendation and recorded dissent: _____
Staff representative signature: _____ Date: _____
Independent reviewer validation: _____ Date: _____
Unconflicted authorised approver: _____ Date: _____
Sponsor endorsement, if unconflicted: _____ Date: _____

No generic approval of “subsequent decisions” is given. Changes to fixed outcomes, budget or scope require a documented amendment with independent review and staff consultation; non-compliance cannot be concealed by revising a target retrospectively.