Pay Equity and Gender Pay Gap Elimination Policy (Version 1.0)

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Policy Owner: Human Resources Department

Approved By: Competent Authority

Review Cycle: Annually, with a comprehensive review at least once every three years

A. Purpose

Geeta University is committed to fair, equitable, transparent and non-discriminatory remuneration for all eligible employees, recognising pay equity as essential to workplace fairness, employee welfare, institutional integrity and equal opportunity. This policy provides a framework to promote equal remuneration for equal work or work of equal value, identify and address unjustified pay disparities, monitor gender-based remuneration differences, and ensure that salary decisions rest on objective and relevant criteria.

B. Objectives

- Ensure equitable remuneration irrespective of gender and promote equal pay for equal work and work of equal value.
- Identify, assess and address unjustified gender pay gaps.
- Establish objective, consistent criteria for salary determination, increments, promotions, incentives and other financial benefits, and prevent discrimination in compensation.
- Promote transparency and accountability, with periodic pay equity assessments, corrective action and records demonstrating fair compensation.

C. Scope and Applicability

This policy applies to teaching faculty; research staff and scholars employed by the University; non-teaching and administrative employees; technical, laboratory and support staff; employees in managerial, supervisory and leadership positions; and permanent, probationary, temporary and contractual employees, as applicable to their terms. Where legally permissible, remuneration practices affecting outsourced and contract workers may be reviewed through contractor-monitoring processes. Implementation is subject to applicable legislation, service rules, employment contracts and University policies.

D. Policy Statement

(a) The University shall maintain a fair compensation system in which remuneration is determined by legitimate, job-related and consistently applied criteria.

(b) No employee shall be paid less or denied a remuneration-related benefit solely on the basis of gender or any other ground prohibited by law.

(c) The University shall periodically examine remuneration data, investigate unexplained differences and take corrective measures where unjustified disparities are established.

(d) Differences in pay may be justified by objective factors such as role responsibilities, qualifications, experience, skills, performance, seniority, market conditions or workload, if applied fairly and consistently.

E. Principles of Pay Equity

- **Equal pay:** employees performing the same work or work of equal value shall receive equitable remuneration, subject to lawful, objectively justified differences.
- **Non-discrimination:** salary, increments, allowances, incentives, bonuses and benefits shall not be influenced by gender-based bias or other prohibited discrimination.

- **Objectivity and consistency:** decisions shall rest on documented criteria applied consistently across comparable roles.
- **Merit and performance:** performance-related pay shall be linked to established standards, measurable outcomes and approved appraisal procedures.
- **Transparency and confidentiality:** documented salary structures, approval procedures and review mechanisms shall be maintained; individual salary information shall be accessed only by authorised persons for legitimate administrative, analytical, audit or legal purposes.

F. Salary Determination and Compensation Structure

The University shall establish and periodically review salary structures. Factors that may be considered include the nature and complexity of the role, qualifications, experience and specialised skills, responsibilities and decision-making authority, performance, workload and working conditions, statutory requirements and approved pay scales, labour-market conditions and institutional finances, and other objectively supportable factors. HR shall endeavour to ensure that comparable roles are assessed by consistent criteria and that significant differences can be explained and documented.

G. Gender Pay Gap Assessment and Methodology

The University shall periodically assess remuneration differences between genders, which may include:

- Average and median remuneration by gender, and differences within comparable roles and grades.
- Gender representation across salary bands, seniority and leadership roles.
- Differences in increments, bonuses, incentives, allowances and benefits; promotion rates; and recruitment offers and starting salaries, where data are available.

Recognised statistical measures may be used, including mean and median gender pay gaps, role-based pay comparison, salary-band analysis and compensation component analysis, and analysis may be broken down by category, department, designation, seniority and employment status. Results shall be interpreted carefully: an overall gap does not by itself establish discrimination, as it may reflect differences in job categories, seniority, experience or leadership representation. Aggregate analysis shall therefore be supplemented, where feasible, by comparisons of employees doing comparable work; limitations from insufficient data or small groups shall be documented and conclusions drawn cautiously.

H. Pay Equity Audit

HR shall coordinate a periodic pay equity audit, preferably annually, in consultation with Finance and other authorities. The audit shall, as appropriate, review remuneration data across departments, grades and designations; identify unexplained differences; examine starting salaries, increments, promotions, bonuses and allowances; examine gender representation across salary bands and leadership; assess whether pay criteria are applied consistently; identify patterns that may indicate bias; and recommend corrective and preventive measures. It may be conducted internally or with an authorised independent professional where the competent authority considers it appropriate.

I. Corrective Action and Pay Gap Elimination

Where an unjustified disparity is identified, the University shall examine its causes and determine corrective action, which may include:

- Adjustment of remuneration where inequity is established, and review of salary-setting, increment and starting-salary practices.
- Correction of inconsistent application of pay scales or criteria, and strengthening of appraisal and promotion procedures.
- Improved access to professional development and career advancement, training for decision-makers, and revision of policies that contribute to disparities.

A corrective action plan shall state the issue, measures, responsible authority, target date and monitoring arrangements. Any salary adjustment requires approval of the competent authority and shall follow applicable law, employment terms and University procedures.

J. Recruitment, Increments, Promotion and Benefits

(a) Starting salaries shall rest on qualifications, experience, skills, role requirements and approved salary structures. The University shall use approved salary ranges wherever feasible, apply consistent criteria to comparable positions, document significant deviations, avoid gender-based assumptions about salary expectations, availability or commitment, and periodically review initial offers.

(b) Increments, promotions and performance-linked pay shall follow approved policies and documented criteria: appraisal criteria shall be relevant to the role, ratings based on documented evidence, similar standards applied to comparable employees, and promotion and leadership opportunities open on fair and transparent terms.

(c) The University shall seek equitable access to allowances, reimbursements, incentives and bonuses, research support, professional development funding and other financial benefits, with eligibility determined by objective criteria, employment terms, approved policies and law.

K. Roles and Responsibilities

a. University Management

- Approve the policy and significant corrective measures, oversee pay equity initiatives and review material findings.

b. Human Resources Department

- Maintain compensation records, coordinate audits and gender pay gap assessments, and review recruitment, increment, promotion and salary-setting practices.
- Report unexplained differences, recommend corrective action to the competent authority and communicate the policy.

c. Finance Department

- Verify salary and benefits data, assess the financial implications of corrective measures, process approved revisions accurately and keep financial records.

d. Heads of Departments and Employees

- Heads and supervisors apply compensation and performance criteria fairly, supply accurate information and cooperate with audits.
- Employees are encouraged to know the remuneration policies and raise genuine concerns through designated channels.

L. Grievance Redressal and Protection Against Retaliation

An employee who believes their remuneration or access to financial benefits has been affected by discrimination or an unjustified disparity may complain to HR or the designated grievance authority. The University shall endeavour to record and acknowledge the complaint, review the relevant information objectively and confidentially, give the employee a reasonable opportunity

to present information, refer the matter to the competent authority where required, communicate the outcome in line with rules and confidentiality, and recommend corrective action where a violation or disparity is established. Employees may also use any statutory mechanism; no legal right or remedy is restricted. Retaliation (intimidation, threats, unfair appraisal, denial of opportunities or other adverse treatment) against anyone who in good faith raises a pay equity concern, reports suspected discrimination or participates in an audit is prohibited, and substantiated retaliation shall be addressed under University rules and law.

M. Data Management, Confidentiality and Reporting

Remuneration records shall be accurate and appropriately classified. Access to individual salary information is restricted to authorised personnel; personal data shall be processed only for legitimate institutional, analytical, administrative or legal purposes; findings may be reported to the competent authority in aggregated form, avoiding unnecessary disclosure of identifiable salary information; records shall be retained under applicable law and retention procedures; and external disclosures made only where authorised or legally required.

N. Monitoring, Training and Awareness

The University may monitor implementation through indicators such as mean and median gender pay gaps, pay differences within comparable roles and grades, distribution by gender across salary bands and senior positions, differences in increments, promotions and bonuses, pay equity concerns received and resolved, disparities reviewed and corrected, completion of audits and timely implementation of corrective plans. It shall set realistic targets based on baseline data, and the competent authority shall review progress periodically. Awareness programmes may be organised for HR personnel, heads and supervisors on equal remuneration, objective salary-setting, gender bias in recruitment and appraisal, fair promotion procedures, interpreting audit findings and confidential handling of remuneration data.

O. Non-Compliance, Review and Implementation

Any employee or decision-maker who deliberately engages in discriminatory remuneration practices, manipulates pay records or obstructs an authorised pay equity review may face action under University rules and due process, and statutory violations shall be dealt with under law. This policy shall be reviewed annually for implementation progress and at least once every three years for comprehensive revision, or earlier where required by changes in law or identified gaps; amendments require approval of the competent authority. It takes effect from the date of approval, and HR, with Finance and relevant authorities, shall facilitate implementation, monitoring, reporting and periodic review.

Deputy Registrar

Satya Vir Singh

Registrar

GEETA UNIVERSITY REGISTRAR PANIPAT