

City of London Corporation

Pay Gap Report 2025

Snapshot Date: 31 March 2024



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Introduction

In accordance with the Gender Pay Gap Regulations the City of London Corporation (“City Corporation”) has been required to publish and report its Gender Pay Gap (GPG) by 30 March annually since 2017. This is published on both the City Corporation and UK Government websites, and covers the following:

- Mean and median gender pay gap in hourly pay.
- Mean and median bonus gender pay gap.
- Proportion of men and women receiving a bonus payment.
- Proportion of men and women in each pay quartile.

Alongside the GPG, the City Corporation has also voluntarily elected to publish both the Ethnicity Pay Gap (EPG) and Disability Pay Gap (DPG) annually to the same requirements. There is ongoing consultation on whether these wider pay gaps should also become statutory requirements.

The analysis of pay gaps is not the measurement of equal pay. Pay gaps measure the differences between the average pay of male and female employees, irrespective of job role or seniority, whereas equal pay concerns pay differences between employees performing the same or similar work, or work of equal value.

The City of London Corporation is committed to promoting equity, equality, diversity, and inclusion (EEDI) across all areas of our operations, and we believe that pay should be based on the skills, experience, and responsibilities of our employees.

The City Corporation’s Equality Objectives 2024-2029 are a dynamic framework advancing this commitment to equity, equality, diversity, and inclusion (EEDI) as a leader, employer and service provider. The Objectives are owned across all departments and institutions.

Our Equality Objectives are:

- Inclusive and Trustworthy Leadership
- Inclusive and Diverse Community
- Accessible and Excellent Services
- Socio-Economic Diversity
- Cross-cutting activity: Evidence and Data

Our Equality Objectives are integral to the effective delivery of our Corporate Plan 2024-29, People Strategy 2024-29 and other elements that shape and drive the organisation over the next five years and beyond. They have been developed through internal and external consultation, providing a direction of travel, not a destination, with progress regularly reviewed.

One of the five key themes of the People Strategy 2024-29 is centred on ‘My Contribution, My Reward – Ambition 25’. Our measure of success is that we will provide flexible, sustainable, fair, equitable and transparent reward and recognition opportunities for our people, beginning with the Ambition 25 project. These will help us attract a diverse array of excellent people. We will increase the clarity and transparency of our roles and how they work together. We will provide assurance that pay and grading is fair. We will support employees to undertake fulfilling and meaningful work that creates organisational success. And we will provide career support to enable progression and improve retention.

Our employees will feel empowered by this greater access to information and opportunities. As a result, we will see reductions in disengagement and resignations due to insufficient role clarity, or pay, reward and opportunity issues. Our people will take responsibility for their individual contributions and be given the tools to learn and gain expertise. With this in mind, we are committed to continuing to reduce pay gaps wherever they exist.

Scope & Methodology

This report reflects payroll data at the snapshot date of 31 March 2024, reported one year in arrears. Its scope, which may differ from other reports, includes:

- All full-time employees and casual workers.
- All departments of the City Corporation and its Institutions¹.
- All professions except for police officers employed by the City of London Police.

Given this, the total headcount used across this report is 5,212 employees. The headcount at the previous snapshot date was 4,988. The increase is due to organisational change and the numbers of casuals engaged at the time of the snapshot.

This pay gap analysis is calculated in line with the government's standard methodology and reporting requirements for Gender Pay Gaps, which compares the median and mean hourly pay rates and bonuses of employee groups. Where possible, these have been applied to the analysis of Ethnicity and Disability Pay Gaps.

These are defined as:

- **Mean Hourly Rate:** the percentage difference between the mean average hourly rate of pay.
- **Median Hourly Rate:** the percentage difference between the midpoints in the ranges of pay.
- **Mean Bonus Payment:** the percentage difference between the mean average bonus payments made in the 12 months prior to the snapshot date.
- **Median Bonus Payment:** the percentage difference between the midpoints in the ranges of bonus payments made in the 12 months prior to the snapshot date.

The mean and median pay gap calculation is based on the total pay: this includes basic pay and additional payments, for example responsibility allowance in schools, unsocial hours pay and Market Forces Supplements (MFS) used for specific recruitment and retention purposes.

This report also examines the proportion of these groups within each quartile of our pay distribution. It is difficult to compare to our grades consistently as the quartile boundaries will often fall within a grade range, and regular additional payments might raise some groups of staff above others in the grade, as a rough guide:

- Upper quartile: Grade G and above
- Upper middle quartile: Grade E to F
- Lower middle quartile: Grade C to D
- Lower quartile: Grade A to B

Demographic information used in the pay gap calculations is drawn from the City Corporation's payroll and HR information system data. Whilst some fields are mandatory, additional sensitive information is added on a voluntary basis by employees through the employee self-service facility on the HR information system. This information is collected in line with the nine protected characteristics identified in the Equality Act 2010.

In accordance with the General Data Protection Regulations and the Data Protection Act 2018, all employees have been sent a privacy notice describing how the City Corporation as a data controller collects and uses personal information during and after employment with the City Corporation. This privacy notice outlines that employees are not required to provide all personal and sensitive information. As such, not all the categories include 100% data capture.

¹ The Institutions of the City of London Corporation refers to the Barbican Centre, the City Bridge Foundation, the City of London Police, the Guildhall School of Music & Drama, and the independent schools that the City Corporation supports - City of London Freeman's School, City of London School, City of London School for Girls, and the City Junior School.

This includes cases where the employee has specifically recorded 'not stated' or 'declined to specify' on employee self-service.

Where relevant, contextual data about the UK population and workforce has been provided. Unless otherwise specified, the sources for these contextual datasets are:

- 2021 Census of England and Wales: [Census - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)
- Gov.uk Gender Pay Gap Data Service: [Find and compare gender pay gap data - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- Office for National Statistics UK Labour Survey: [A08: Labour market status of disabled people - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

Gender Pay Gap

Definition

The UK Government Gender Pay Gap regulations compare the pay of female and male employees, and do not address how employers should make their Gender Pay Gap calculation if they have employees who do not identify as either male or female (e.g. non-binary).

In accordance with this, and the City Corporation's approach to demographic data collection outlined above, all calculations have been made utilising data on the sex of employees as either "female" or "male", as defined as a protected characteristic of the Equality Act 2010. This data is held on 100% of the workforce and has been used in the calculation of the GPG.

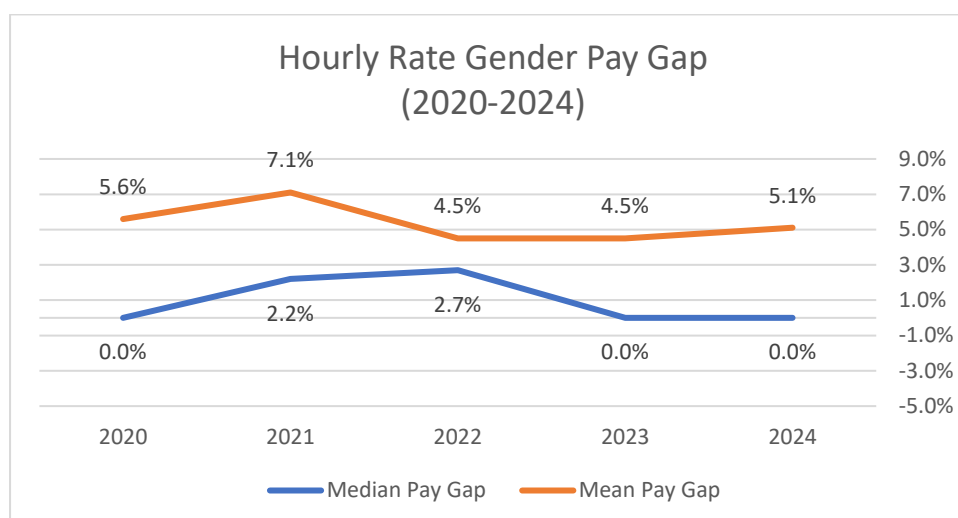
Hourly Rate

The City of London Corporation's hourly rate Gender Pay Gap at the snapshot date of 31 March 2024 is as follows:

Table 1: City of London Corporation Gender Pay Gap 2024

	2020	2021	2022	2023	2024
Median Pay Gap	0.0%	2.2%	2.7%	0.0%	0.0%
Mean Pay Gap	5.6%	7.1%	4.5%	4.5%	5.1%

Figure 1: City of London Corporation Gender Pay Gap Trend 2020-2024



The median hourly rate GPG stood at 0.0% on 31 March 2024. This is consistent with previous years showing that the City Corporation has a minimal median hourly rate GPG². This indicates that, on average, women and men in our organisation are paid similarly based on average hourly pay rates.

The GPG for mean hourly pay rates was 5.1% on 31 March 2024. This is a slightly increased from the previous year, but only minimally, and lower than snapshot dates in 2020 and 2021.

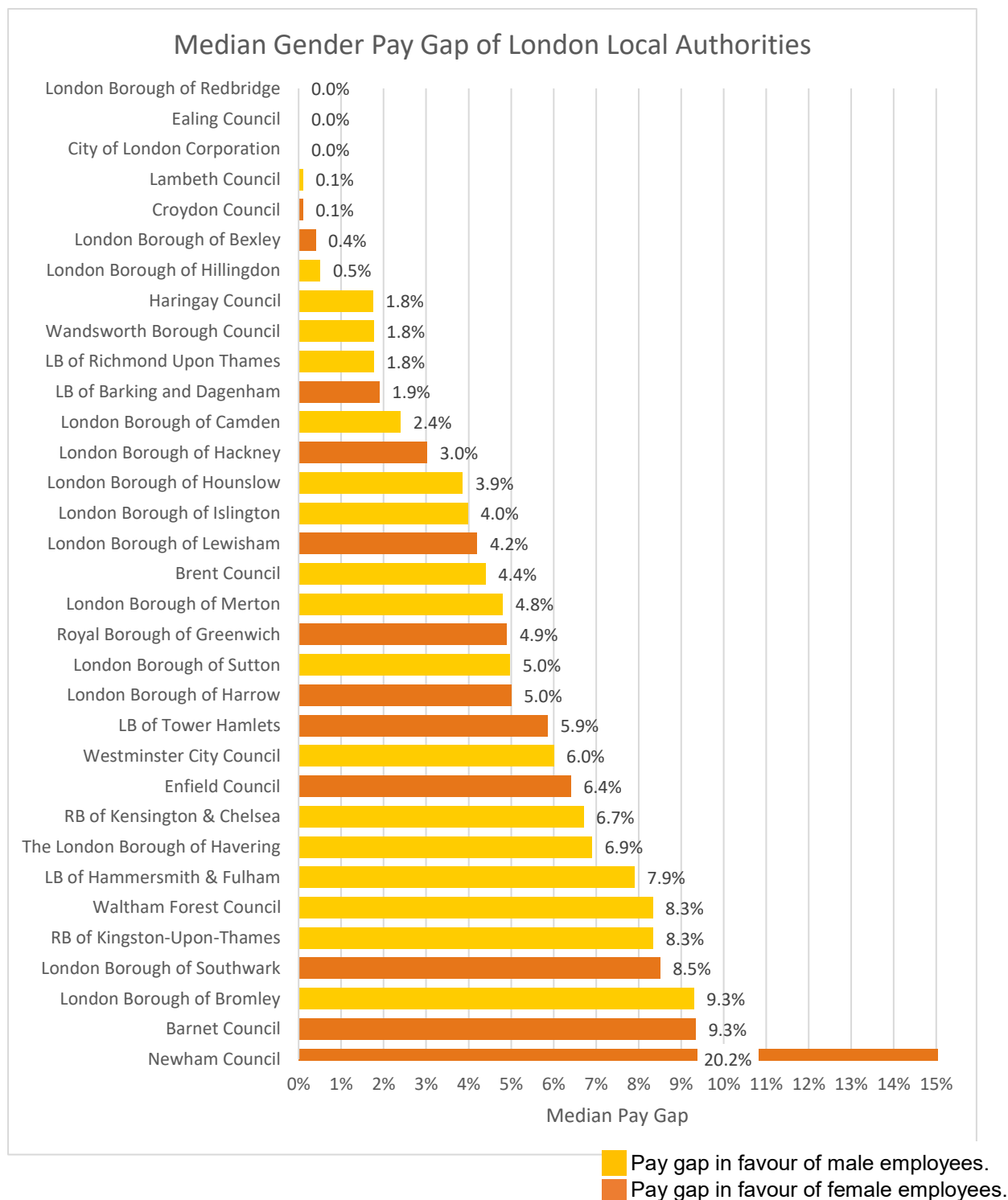
² 2.7% is equivalent to an increment on the City Corporation's pay scale. Fluctuations in the median hourly rate of this order are therefore not indicative of any wider trend. Mathematically speaking, small changes in workforce composition can move the median by a single increment, creating the increase/decrease in calculated pay gaps.

Benchmarking

The City of London Corporation has a smaller GPG than national benchmarks; the median hourly rate GPG for all reporting companies in for the snapshot date of 31 March 2024 was 8.6% (down from 9.0% in 2023).

We also compare quite favourably to the local government London Boroughs, the City Corporation was one of three London local authorities reporting no median GPG for the snapshot date of 31 March 2024 (5 in 2023). The majority of London Boroughs report a pay gap figure of less than 5% towards men or women (20 out of 33), with only 3 reporting a figure larger than the UK average (8.6%).

Figure 2: Comparison of Median Gender Pay Gap to London Local Authorities 2024



Looking at industrial sectors as a whole, there is a variation in overall pay gaps reported by each sector, with both Finance and Construction sectors reporting gaps of more than 20%, while Facilities & Security; Hospitality; Local Government; and Not for Profit have gaps less than 2%.

Table 2: Comparison of Median Gender Pay Gap by Industrial Sector 2024

Industry	Median gender pay gap
Agriculture and forestry	2.7%
Central government	7.4%
Chemicals, pharmaceuticals and oil	6.1%
Facilities, security and support services	0.3%
Construction	22.7%
Electricity, gas and water	10.5%
Engineering and metals	10.3%
Finance	21.0%
Food, drink and tobacco	3.8%
Hotels, catering and leisure	0.9%
Information and communication	14.9%
Local government	1.5%
General manufacturing	8.0%
Not for profit	1.8%
Paper and printing	10.7%
Professional and business services	10.8%
Public education	19.9%
Public health	5.8%
Public safety	11.3%
Retail and wholesale	5.0%
Transport and storage	6.3%

Source: Brightmine – [Gender Pay Gap: Findings from 2024 reporting](#) (07/04/25)

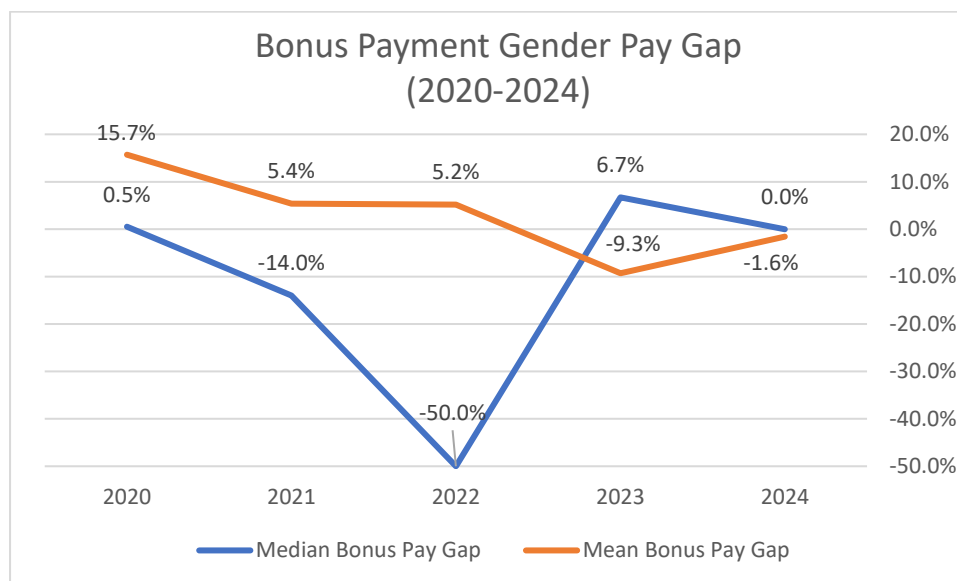
Bonus Payments

The City of London Corporation's bonus payment Gender Pay Gap for the twelve months from 1 April 2023 to 31 March 2024 is as follows:

Table 3: City of London Corporation Gender Bonus Pay Gap 2024

	2020	2021	2022	2023	2024
Median Bonus Pay Gap	0.5%	-14.0%	-50.0%	6.7%	0.0%
Mean Bonus Pay Gap	15.7%	5.4%	5.2%	-9.3%	-1.6%

Figure 3: City of London Corporation Gender Bonus Pay Gap Trend 2020-2024



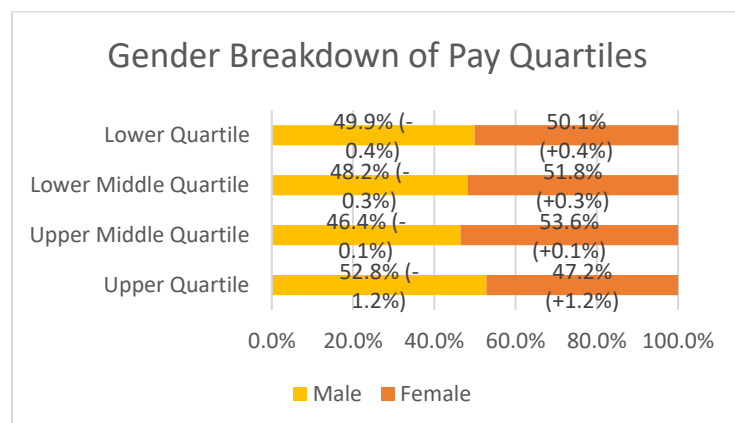
Bonuses were received by 5.8% (5.4%; 9.0%; 26.0%; 13.1%) of women and 4.7% (5.4%; 11.1%; 34.5%; 14.1%) of men. This continues the reduced percentages of bonuses awarded in recent years reflecting the period when contribution pay was not operated. The Contribution Pay awards made for October 2024 will appear in the March 2025 snapshot.

The reduced number of bonus payments means that rates are more likely to fluctuate due to the reduced numbers being compared. This has can be seen in the level of fluctuation in recent years in the graph above. As such while both median and mean bonus gender pay gap measures have shown a potentially positive shift towards the zero mark this year, with the low level of awards of bonuses, it is not possible to draw any strong conclusions. The slightly higher proportion of females receiving a bonus compared to males is a minor change, from an equal level of awards last year.

Pay Quartiles

The distribution of female and male employees across pay quartiles in the City of London Corporation is presented in the below chart (snapshot date 31 March 2024, with change on the previous year):

Figure 4: City of London Corporation Gender Breakdown of Pay Quartiles (2024)



Except for the Upper Quartile, most changes from last year are minimal (less than 0.4% shift). The upper quartile did move just over a percentage point (1.2%) closer to an equal split, this builds on the 2.2% shift in the same direction seen in the previous year.

Overall, the proportion of men and women within our workforce are broadly a 50:50% ratio. The ratio of female to male employees within all quartiles remains broadly equal across the four quartiles. The two higher quartiles (UQ and UMQ) show the largest variance from an equal split, being 2.8% and 3.6% respectively.

Ethnicity Pay Gap

Definition

In April 2023, the UK Government published guidance for those employers who want to report their Ethnicity Pay Gap (EPG) voluntarily. The aim is to develop a consistent, methodological approach to EPG reporting. A key suggestion is not to aggregate ethnicity categories where possible. Since the 2023 snapshot, we have chosen to breakdown to aggregated categories (see below), to expand our pay gap analysis.

At present, there is no standard format on how to present this information, and consultation is currently underway to determine if such reporting should be statutory. We will continue to review our approach and look at examples elsewhere on how we can meaningfully present a more detailed analysis. We also continue to undertake “binary analysis” between the largest group and others, as per our previous methodology, to allow historic comparison until we have a fully refined approach on aggregated categories. Two different forms of EPG analysis are presented:

1. A binary analysis, comparing the gap between our largest category of employees, those identifying as white, to all other ethnic groups, as a proportion of white employees pay.
2. An aggregated category analysis, comparing the gap between each aggregated category. The six aggregated categories used are as follows:

Asian: Asian – Bangladeshi; Asian – British; Asian – Indian; Asian – Pakistani; Asian – Any other Asian background; Chinese.

Black: Black – African; Black – British; Black – Caribbean; Black – Any other Black background.

Mixed: Mixed – Asian & White; Mixed – White & Black African; Mixed – White & Black Caribbean; Mixed – Any other Mixed background.

Other Ethnic Groups: Arab; Any other ethnic group.

White: White – British; White – EU; White – Other European; White – Any other White background; Irish; Gypsy; Irish Traveller.

Not Known: Not Known; No information provided.

Employees are requested to provide data on their ethnicity via the HR information system, using the standard UK government classifications outlined above. There is no requirement for disclosure, with 18.3% having not disclosed. This is up slightly from 17.0% for the 31 March 2023 snapshot. Accurate analysis is hampered by the level of non-disclosure. Improved disclosure rates could alter the conclusions drawn in this report, particularly aggregated category analysis, as a reallocation to some of the smaller categories could shift their proportional share significantly.

Binary EPG Analysis

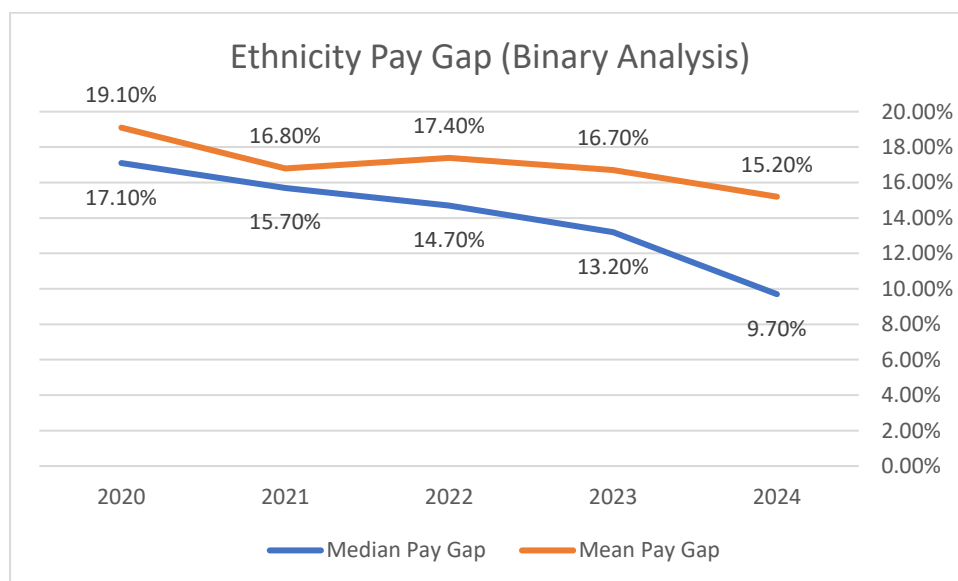
Hourly Rate

The City of London Corporation's hourly rate Ethnicity Pay Gap at the snapshot date of 31 March 2024, using binary analysis, is as follows:

Table 4: City of London Corporation Ethnicity Pay Gap 2024

	2020	2021	2022	2023	2024
Median Pay Gap	17.1%	15.7%	14.7%	13.2%	9.7%
Mean Pay Gap	19.1%	16.8%	17.4%	16.7%	15.2%

Figure 5: City of London Corporation Ethnicity Pay Gap Trend 2020-2024



The EPG for median hourly rate was 9.7% and the mean hourly pay rates 15.2% on 31 March 2024. Both measures are a reduction on the previous year and continue the improving trend of recent years, with the median and mean EPG narrowing by 7.4% and 3.9% respectively since 2020.

This means that, on average, employees identifying as Black, Asian, Mixed, or other Ethnic Groups (OEG) in our corporation earn less than employees identifying as White based on median and mean hourly pay rates. This translates to £4.51 less an hour for the mean rate, and £2.47 less an hour for the median rate, across the whole workforce.

The gap is not related to pay for the same job, rather, the data shows that this is reflection of the differing distribution of the two ethnicity categories across the four quartiles of the workforce. There is a substantial drop in the proportion of 'white' in the lower quartile (48% compared to c.65-70% in the other three quartiles) and similarly a large reduction in the proportion of 'OEG' in the upper quartile (9% compared to c.19-24% in the other three quartiles). At the same time, it is noted that both the upper and lower quartiles currently have the highest levels of undeclared ethnicity and that this may affect the accuracy of these figures (in either direction).

Table 5: City of London Corporation Ethnicity Pay Gap – Breakdown by Quartiles

Quartile	White	OEG	Not Known	Median White Hourly Rate	Median OEG Hourly Rate	EPG Median Hourly Rate%	Mean White Hourly Rate	Mean OEG Hourly Rate	EPG Mean Hourly Rate%
Upper	69.7%	8.9%	21.4%	£44.63	£42.30	5.22%	£46.37	£46.02	0.75%
Upper Middle	71.6%	18.6%	9.8%	£28.21	£27.57	2.27%	£28.70	£28.42	1.00%
Lower Middle	64.3%	24.3%	11.4%	£22.27	£21.90	1.64%	£22.33	£22.29	0.16%
Lower	48.2%	21.2%	30.6%	£16.83	£16.83	0.00%	£16.53	£16.65	-0.71%
Totals	63.5%	18.3%	18.3%	£25.45	£22.98	9.71%	£29.62	£25.11	15.23%

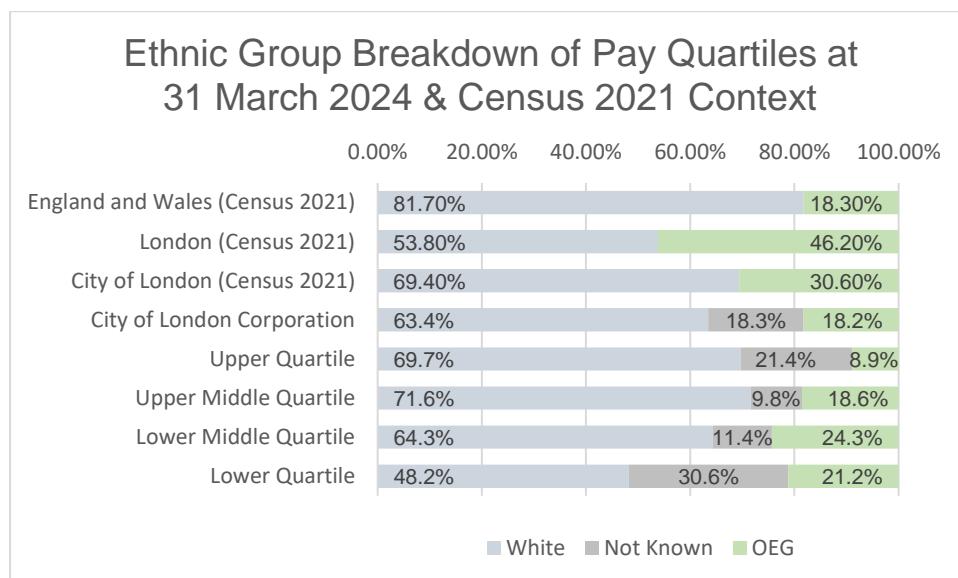
OEG = employees identifying as Black, Asian, Mixed, or other Ethnic Groups.

The levels of non-disclosure and the differences in proportions seen both warrant further analysis and investigation to understand if there are actions we should be taking to support our EEDI principles across our workforce and employee lifecycle.

Pay Quartiles

The distribution of employees by ethnic group across pay quartiles in the City of London Corporation is presented in the below chart (snapshot date 31 March 2024, alongside contextual data taken from the 2021 Census).

Figure 6: City of London Corporation Ethnicity Breakdown of Pay Quartiles (2024)



The data shows that while proportions of Black, Asian, Mixed, or other Ethnic Group employees at the overall Corporation level (18.2%) and in three of the pay quartiles (18.6%-24.3%) are comparable to or exceed the England and Wales census (18.3%), they are all substantially below proportions reported in the Census 2021 for both 'London' (46.2%) and 'City of London' (30.6%). The lower level seen in the upper quartile is clearly below all three Census 2021 benchmarks.

The proportion of white employees is below the England and Wales census 2021 benchmark (81.7%) overall and at all quartiles, but well below that of the London Census 2021 benchmark (53.8%; except for the Lower Quartile 48.2%). The proportion overall, and at three of the four quartiles are relatively close to the City of London Census benchmark (69.4%), varying by no more than 6% from the benchmark. However, the same is not true at the lower quartile, being 21.2% below the City of London Census 2021 benchmark.

Accurate analysis is hampered by the lack of disclosure across all quartiles. Improving disclosure rates could significantly shift the conclusions drawn in this report. This is particularly the case for the Lower Quartile, where 30.6% of employees in this bracket do not disclose their ethnicity. As part of our Equality Objectives, we are committed to Improving the robustness of equalities data to inform an evidenced based approach to advancing equality, equality, diversity and inclusion. This includes improving our current declaration rates.

Benchmarking

As Ethnicity Pay Gap reporting continues to be voluntary for employers, there is no statutory instrument, or national database for benchmarking. This reflects the complexity of analysing a multi-faceted category such as ethnicity, and/or the issue of representing these fairly using a binary measure.

As a measure of comparison, it is possible to look to Camden Council, which has publicly reported their binary EPG since 2015/16. For the snapshot date of 31 March 2024 Camden reported a median hourly EPG of 12.0% (11.2% in 2023) and a mean hourly EPG of 12.0% (13.3%)³.

Bonus Payments

The City of London Corporation's bonus payment Ethnicity Pay Gap for the twelve months from 1 April 2023 to 31 March 2024, using binary analysis, is as follows:

Table 5: City of London Corporation Ethnicity Bonus Pay Gap (2024)

	2020	2021	2022	2023	2024
Median Bonus Gap	31.9%	49.9%	40.0%	-60.0%	14.5%
Mean Bonus Gap	23.1%	22.2%	24.4%	-0.7%	6.2%

The City Corporation's median ethnicity bonus pay gap continues to fluctuate, being 14.5% (more for White employees), from the previous year's -60.0% (more for Black, Asian, Mixed, or other Ethnic Group employees). The percentage difference is however lower than any of the previous four years. The mean ethnicity bonus gap, increased to 6.2%, from a minimal -0.7% in 2023.

As previously highlighted, Contribution Pay, a performance related scheme for those at the top of the grade was not operated in the data snapshot period. As such the level of bonus payments made were minimal, with 5.65% of employees identifying as white receiving a bonus, compared to 6.52% of employees identifying as Black, Asian, Mixed, or other Ethnic Group. The relatively low proportion of employees receiving bonus payments, means individual cases are mathematically more liable to have a greater influence or fluctuation on the calculation of the gap analysis.

³ [London Borough of Camden pay gap report 2022-23 | Open Data Portal](#)

Aggregated Category EPG Analysis

Hourly Rate

The City of London Corporation's hourly rate of pay at the snapshot date of 31 March 2024, broken down into aggregated ethnicity categories, is as follows:

Table 6: City of London Corporation Ethnicity Aggregated Analysis: Median Pay Gap (2024)

Ethnic Category	Black	Asian	Mixed	OEG
White	16.1%	7.2%	7.4%	16.1%
Black		-9.0%	-8.8%	0.0%
Asian			0.23%	9.0%
Mixed				8.8%

OEG = Other Ethnic Groups, not contained within the aggregated categories.

Table 7: City of London Corporation Ethnicity Aggregated Analysis: Mean Pay Gap (2024)

Ethnic Category	Black	Asian	Mixed	OEG
White	19.2%	15.1%	10.9%	25.8%
Black		-4.2%	-8.4%	6.6%
Asian			-4.3%	10.8%
Mixed				15.0%

OEG = Other Ethnic Groups, not contained within the aggregated categories.

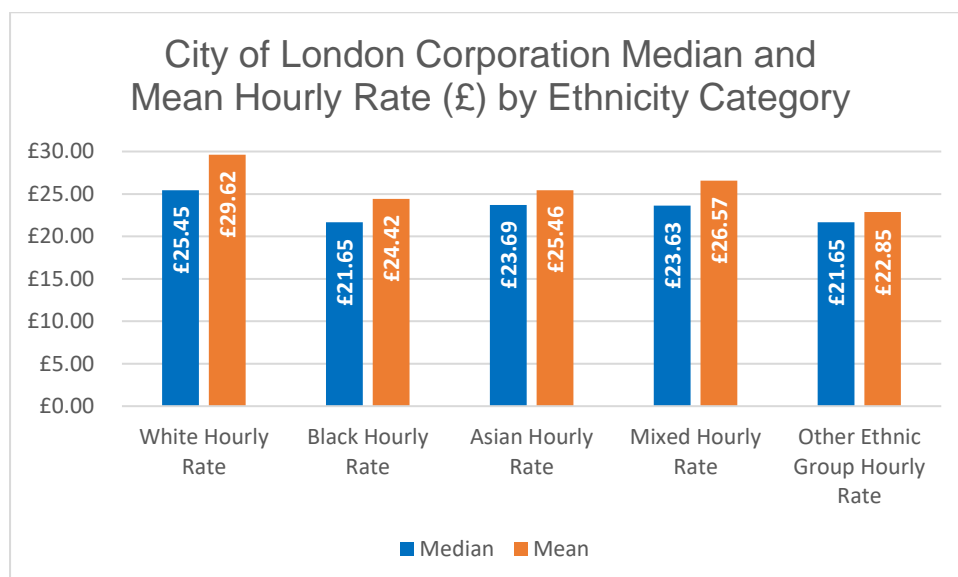
Analysis at the aggregated level results in 10 ethnicity pay gap figures to report on for each of the median and mean analysis. This provides some greater insight into the aggregated ethnic categories, although at the same time providing a more complex data set to interpret. Positive figures in the table reflect that the pay gap is in the favour of the ethnic category on the left of the table. For example, at the corporate level, employees identifying as white receive 16.1% (median pay gap) more than employees identifying as black. Negative figures indicate a pay gap in favour of the ethnic category at the top of the table. So, employees identifying as Asian receive 4.2% (median pay gap) more than employees identifying as black.

Overall, there is a large range in the ethnicity pay gaps observed, from minimal to large. The largest being 25.8% (Mean Pay Gap: White category compared to Other Ethnic Groups category). There are some clear patterns at the overall corporate level, with the White category receiving a higher rate of pay compared to all other groupings, and the Other Ethnic Groups category receiving a lower rate of pay compared to all others (except median pay gap with black category – where there is no gap). This is confirmed by the median and mean hourly rates for each category.

Table 8: Ethnicity Aggregated Analysis - Median and Mean Hourly Rates

	White Hourly Rate	Black Hourly Rate	Asian Hourly Rate	Mixed Hourly Rate	Other Ethnic Group Hourly Rate
Median	£25.45	£21.65	£23.69	£23.63	£21.65
Mean	£29.62	£24.42	£25.46	£26.57	£22.85

Figure 7: City of London Corporation Median and Mean Hourly Rate by Ethnicity (2024)



Employees identifying as White have the highest median and mean hourly rates of pay. Employees from all other ethnicity categories are paid less. For median pay, this ranges from £1.77 less for employees identifying as from an Asian background, to £3.80 less for employees identifying as black or other ethnic background. For mean pay, the differences are larger, with the lowest being £3.05 less for employees identifying as from a Mixed background, to £6.76 less for employees from an Other Ethnic group category.

Pay Quartiles

The distribution of employees by ethnic group across pay quartiles in the City of London Corporation is presented in the below chart and table (snapshot date 31 March 2024, alongside contextual data taken from the 2021 Census)

Table 9: Ethnicity Aggregated Analysis – Pay Quartile Distribution and Benchmarking

	White	Black	Asian	Mixed	OEG	Not Known
Upper Quartile	69.66%	2.61%	2.92%	3.00%	0.38%	21.43%
Upper Middle Quartile	71.60%	6.29%	8.29%	2.84%	1.15%	9.82%
Lower Middle Quartile	64.31%	9.29%	9.13%	4.37%	1.53%	11.36%
Lower Quartile	48.24%	8.90%	6.52%	3.83%	1.92%	30.60%
City of London Corporation Total	63.45%	6.77%	6.72%	3.51%	1.25%	18.30%
England and Wales (Census 2021)	81.70%	4.00%	9.30%	2.90%	2.10%	0.00%
London (Census 2021)	53.80%	13.50%	20.70%	5.70%	6.30%	0.00%
City of London (Census 2021)	69.40%	2.70%	16.80%	5.50%	5.60%	0.00%

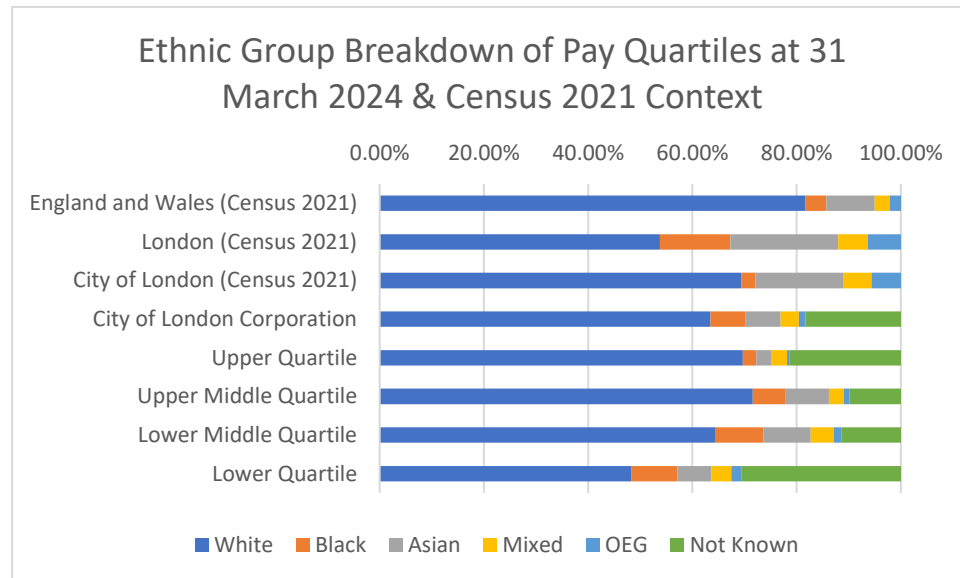
Looking at the split of the different Ethnic Groups across the quartiles, helps to highlight the potential source of the pay gaps identified. Across all categories, except for white and mixed, there is a much smaller proportion of employee in the upper quartile than in the other three quartiles and compared to total proportion. Both Black and Asian categories fall to lower than three percent (2.6% and 2.9% respectively), compared to making up just less than 7 percent of the overall workforce.

There is no consistent pattern across the aggregated categories: the proportion of employees identifying as Black is more heavily weighted towards the two lowest quartiles; whereas employees identifying as Asian have higher proportions in the two middle quartiles; the

proportions of employees identifying as mixed are relatively consistent across all quartiles; while Other Ethnic Groups proportions are small overall, there is a small increase in proportion with reducing quartile. Figures for White and Not Known were presented in the binary analysis.

As previously outlined, accurate analysis of both the representative nature of the City Corporation is hampered by the lack of disclosure across all quartiles, particularly the Lower and Upper Quartiles. A more comprehensive data set, may result in a shift in overall proportions.

Figure 8: City of London Corporation Ethnicity Breakdown of Pay Quartiles (2024)



Disability Pay Gap

Definition

There are currently no UK Government requirements or guidelines for the calculation of the Disability Pay Gap, nor any statutory instrument or national database for benchmarking. As such, the City of London Corporation chooses to voluntarily calculate its Disability Pay Gap using data that employees are asked to voluntarily self-certify as “Disabled” or “Not Disabled”. It is therefore important note that his indicator does not accurately measure whether an employee meets the definition of “disability” under the Equality Act 2010.

For the snapshot date of 31 March 2024, the non-disclosure rate for disability data for all City Corporation employees is 28.1% (25.2% in 2023).⁴

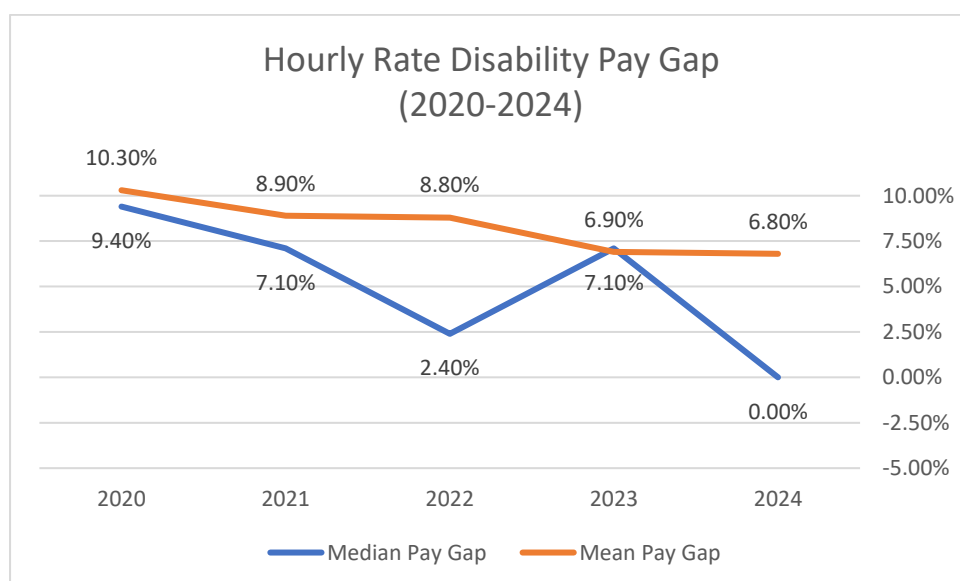
Hourly Rate

The City of London Corporation’s hourly rate Disability Pay Gap at the snapshot date of 31 March 2024 is as follows:

Table 10: City of London Corporation Disability Pay Gap 2024

	2020	2021	2022	2022	2024
Median Pay Gap	9.4%	7.1%	2.4%	2.4%	0.0%
Mean Pay Gap	10.3%	8.9%	8.8%	8.8%	6.8%

Figure 9: City of London Corporation Disability Pay Gap Trend 2020-2024



The DPG for mean hourly pay rates stood at 6.8% on 31 March 2024. This is a minimal decrease on the previous year (6.9%), but continues the downward trend of recent years, with the mean DPG narrowing by 3.5% since 2020. The mean pay data therefore indicates that employees who identify as disabled are on average paid less than employees who identify as not disabled.

⁴ This is an aggregate of employees providing data under the category “Declined to specify” and those who leave the field blank.

The median hourly rate DPG stood at 0.0% on 31 March 2024. This is a reduction from the previous year (7.1%) and is the first time no differential has been reported between those identifying as Disabled and Not Disabled on this measure.

Table 11: City of London Corporation Disability Pay Gap - Breakdown by Quartiles 2024

Quartile	Not Disabled	Disabled	Not Known	Median Not Disabled Hourly Rate	Median Disabled Hourly Rate	DPG Median Hourly Rate%	Mean Not Disabled Hourly Rate	Mean Disabled Hourly Rate	DPG Mean Hourly Rate%
Upper	69.97%	4.84%	25.19%	£44.38	£42.00	5.4%	£46.68	£44.10	5.5%
Upper Middle	69.76%	6.98%	23.25%	£28.21	£27.57	2.3%	£28.83	£28.18	2.3%
Lower Middle	66.92%	6.37%	26.71%	£21.85	£22.65	-3.7%	£22.25	£22.36	-0.5%
Lower	57.44%	5.37%	37.19%	£16.69	£16.83	-0.8%	£16.45	£16.45	0.0%
Totals	66.02%	5.89%	28.09%	£25.21	£25.21	0.0%	£29.19	£27.20	6.8%

Looking at the proportion of employees across the quartiles, the numbers are broadly consistent, however the high rates of non-disclosure at all quartiles hampering any useful analysis.

Bonus Payments Disability Pay Gap

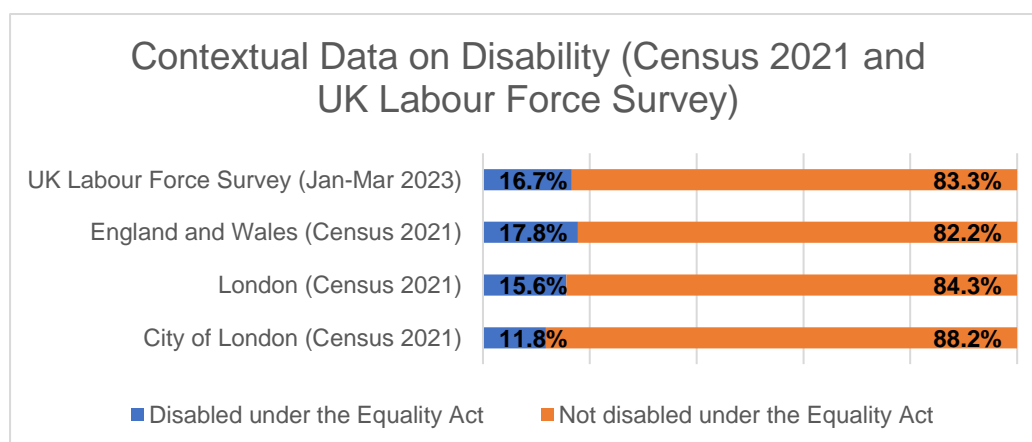
The City of London Corporation's bonus payment Disability Pay Gap for the twelve months from 1 April 2023 to 31 March 2024 is as follows:

Table 12: City of London Corporation Disability Bonus Pay Gap 2024

	2020	2021	2022	2023	2024
Median Bonus Gap	3.9%	16.8%	-35.3%	-4.0%	0.0%
Mean Bonus Gap	-14.8%	-4.3%	-31.4%	32.6%	-40.1%

The median bonus DPG sits at 0.0% for the first time. The mean bonus payment DPG has with the exception of 2023, generally being in favour of those identifying as disabled. The mean disability bonus gap figure for 2024 (-40.1%) is the largest disparity in recent years.

Only 16 (5.21%) of employees who identify as disabled received a bonus in the snapshot period, compared to 233 (6.77%) of employees who do not identify as disabled. With such very small numbers in the Disabled Category receiving a bonus, because of the low proportion of all staff receiving bonus payments in the snapshot period, it is difficult to take any strong inferences from the data.



Conclusion and Next Steps

Overall, the pay gap figures reported remain broadly consistent with those from previous years, with some small shifts compared to March 2023. The only exception being the median disability pay gap, which has reduced to zero (from 7.1%).

Overall, these shifts seem to be indicative of a longer-term positive trend in all pay gap figures. However, due to the nature of the calculation method there will be a natural mathematical variation in the workforce numbers included within the snapshot each year and therefore some deviation due to these measures used that are unrelated to pay practice.

The levels of non-disclosure observed highlights the continued need to actively work with the workforce to improve our data, especially the levels of disclosure on protected characteristics across employees and our casual workforce. This will enable stronger analysis and greater insight.

The City of London Corporation is committed to equal opportunities and equal treatment for all employees. Although many of the pay gap measurements are either already relatively small, or larger but moving in a positive direction, there will always be more that we can do to improve our culture, policy, process, and practices to ensure a truly bias free work environment for all employees. Our aim is to create an environment, in which people irrespective of their background can expect to develop, progress, flourish and perform and be remunerated fairly for the work that they do.

To support our EDI commitments, reduce any perceived barriers to engagement and progression and work towards greater pay equity. This will include:

- Guarantee the robustness of our job evaluation scheme and policy, to ensure that we have equal pay for work of equal value, which provides protection against claims of equal pay. This forms a key element of the Ambition 25 programme.
- Review of our pay structure and reward practices to ensure that these support fair and equal remuneration, and that any additional payments are minimised, and where they remain necessary, are actively monitored and moderated.
- Ensure our work and engagement practices do not preclude or discourage capable individuals from applying to, be appointed, and progressing within the organisation (e.g. recruitment activities; where we advertise; the benefits we offer; our support for flexible working).