City of London Corporation

Pay Gap Report 2026

Snapshot Date: 31 March 2025

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1. 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.

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 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. These will help us attract a diverse array of excellent people. With this in mind, we are committed to continuing to reduce pay gaps wherever they exist.

2. Scope & Methodology

This report is based on payroll data at the snapshot date of 31 March 2025. Its scope, which may differ from other City Corporation or institutional publications, includes:

- All full-time and part-time employees and casual workers.
- All departments of the City Corporation and its Institutions[1].
- All professions except for police officers employed by the City of London Police.

The total headcount used across this report is 5,632 (and 5657 for bonus calculations) employees, an increase from 5,212, at the previous snapshot. The rise reflects organisational change and the numbers of casuals workers engaged at the time of the snapshot.

The difference between the headcounts for the hourly rate analysis and bonus calculations analysis is due to the treatment of certain arrangements as required by the statutory guidance. Employees on reduced pay during the snapshot period (e.g. due to sickness, maternity etc.) are not included in the hourly rate analysis. Where these employees have received a bonus at any time in the period, these are included for bonus calculations analysis.

Pay gap calculations follow the UK Government's standard Gender Pay Gap methodology and reporting requirements, which compares the median and mean hourly pay and bonus payments of employee groups. Where possible, the same methodology has been applied to the Ethnicity and Disability Pay Gap analysis.

Definitions

- **Mean Hourly Pay Gap:** Percentage difference between the mean average hourly rate of two comparison groups.
- **Median Hourly Pay Gap**: Percentage difference between the median average hourly rate in each group.
- **Mean Bonus Pay Gap**: Percentage difference between the mean average bonus payments made in the 12 months prior to the snapshot date.
- **Median Bonus Pay Gap**: Percentage difference between the median average bonus payments made over the same period.

The Mean and Median pay gap calculation is based on the total pay: this includes basic pay and additional payments such as responsibility allowances in schools, unsocial hours pay and Market Forces Supplements (MFS) used for specific recruitment and retention purposes.

Pay Quartiles

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

[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 Freemen's School, City of London School, City of London School for Girls, and the City Junior School.

Data Sources and Disclosure

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

Contextual Data

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

These contextual datasets support meaningful comparison of City Corporation workforce representation and pay structures against wider population and labour market trends.

3. Executive Summary

The City of London Corporation continues its commitment to equity, equality, diversity and inclusion (EEDI) across its workforce, voluntarily reporting on Ethnicity and Disability Pay Gaps alongside the statutory Gender Pay Gap requirements. This year's analysis reflects payroll data at the 31 March 2025 snapshot date and includes all full-time and part-time employees and casual workers across all departments and institutions.

Overall Position

Across all three pay gap measures—Gender, Ethnicity and Disability—the City Corporation reports **broadly stable outcomes** relative to previous years, with notable improvements in several areas. These outcomes reflect long-term organisational work to strengthen fair reward practices, develop inclusive career pathways, and increase transparency in workforce structures.

However, **incomplete demographic disclosure**, particularly for ethnicity and disability, continues to limit the interpretability of some findings. Low reporting levels on Social Mobility have additionally meant that it has not been possible to investigate any social mobility pay gaps. Increasing confidence and participation in voluntary self-reporting remains a strategic priority. The launch of the new SAP system is expected to support higher rates of completion.

Gender Pay Gap

- The **median Gender Pay Gap remains at 0.0%**, consistent with previous years. This indicates that, women and men in our organisation are paid similarly based on median hourly pay rates.
- The **mean Gender Pay Gap has decreased to 3.5%**, indicating that, women on average earn 3.5% less per hour than men based on mean average pay rates across the whole workforce. This continues a steady long-term improvement and compares favourably with the **UK-wide average of 6.9%**.
- Representation across all pay quartiles remains close to an even gender split, with only minimal year-on-year variation.
- **Bonus outcomes** show further movement towards parity, with both mean and median bonus gaps **favouring women** in 2025.

Ethnicity Pay Gap

- The **binary Ethnicity Pay Gap** has continued to narrow, with the **median gap falling to 2.2%** and the **mean to 5.6%**, marking improvement compared with previous years.
- These improvements are driven by shifting representation across quartiles, though gaps remain influenced by the **lower representation of Black, Asian, Mixed and Other Ethnic Groups** paid in the upper quartile. In the upper quartile 10% of the workforce identify as being from one of these categories compared to 18% across the whole workforce.
- Aggregated analysis shows continued variation between ethnic groups, with the largest differentials between White and Other Ethnic Groups categories.
- Bonus outcomes show parity at the median and a mean bonus gap favouring other ethnic groups.
- With 22.5% of those included within the snapshot having not disclosed their ethnicity accurate analysis is hampered.

Disability Pay Gap

- The **median Disability Pay Gap remains at 0.0%,** consistent with 2024.
- The **mean gap has decreased to 5.9%,** continuing its downward trend since 2021.
- Interpretation remains limited by **high non-disclosure rates (31.55%)**, reinforcing the importance of sustained engagement to improve completion of sensitive data fields.
- Bonus results show **median parity** and a **mean bonus gap of -21.2%,** indicating higher average bonus payments among employees identifying as disabled**.**

Key Themes Influencing City of London Pay Gaps

- Workforce composition and representation across quartiles
- Bonus policy structure, including the operation of the 1.5% Contribution Pay scheme
- High levels of non-disclosure, particularly for ethnicity and disability
- High levels of non-disclosure amongst the casual workforce
- On-going organisational change and patterns in casual workforce engagement

These factors highlight the relationship between workforce representation and reward structures.

Next Steps

The City Corporation will continue to focus on transparent and inclusive workforce practices, with priorities including:

- **Modernising pay structures and reward governance**
- **Improving progression pathways** to support stronger representation in higher paid grades
- **Enhancing data disclosure**, supported by clear communication and ongoing engagement
- **Reviewing and refining bonus structures** to ensure fairness and prevent unintended disparities
- **Preparing for upcoming equality reporting legislation**, including future requirements for ethnicity and disability pay gap reporting
- **Reviewing how we monitor and analyse workforce practices** on a more regular basis through the lens of EEDI

These actions demonstrate a long-term commitment to transparency, evidence-based decision-making, and an inclusive employee experience.

Main Report

4. 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.

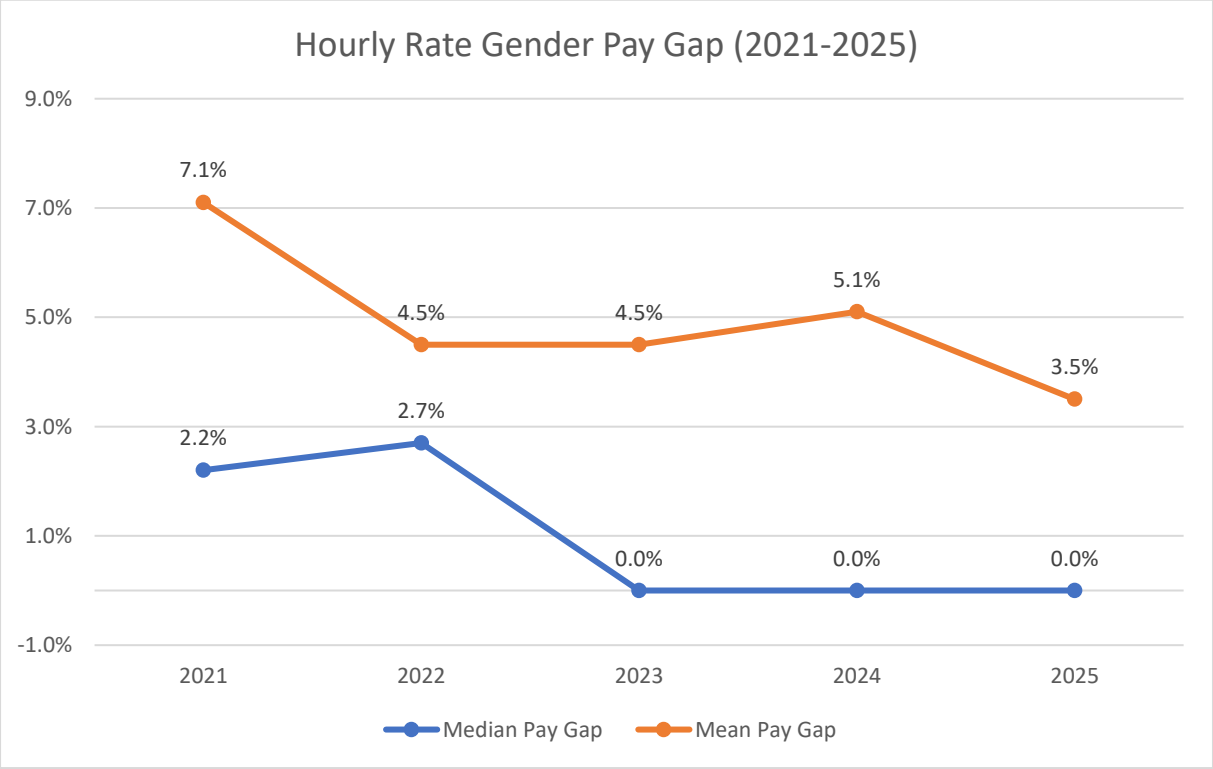
Hourly Rate

The City of London Corporation's hourly rate Gender Pay Gap at the snapshot date of 31 March 2025 is as follows:

Table 1: City of London Corporation Gender Pay Gap 2025

	2021	2022	2023	2024	2025
Median Pay Gap	2.2%	2.7%	0.0%	0.0%	**0.0%**
Mean Pay Gap	7.1%	4.5%	4.5%	5.1%	**3.5%**

Figure 1: City of London Corporation Gender Pay Gap Trend 2021-2025



The median hourly rate GPG stood at 0.0% on 31 March 2025. This is consistent with previous years showing that the City Corporation has a minimal median hourly rate GPG[2]. This indicates that, on average, women and men in our organisation are paid similarly based on median hourly pay rates.

The GPG for mean hourly pay rates was 3.5% on 31 March 2025. This is a considerable reduction from the previous year and is the lowest recorded gap in, recent years. This can be attributed to initiatives such as improved career development opportunities and a focus on equitable recruitment.

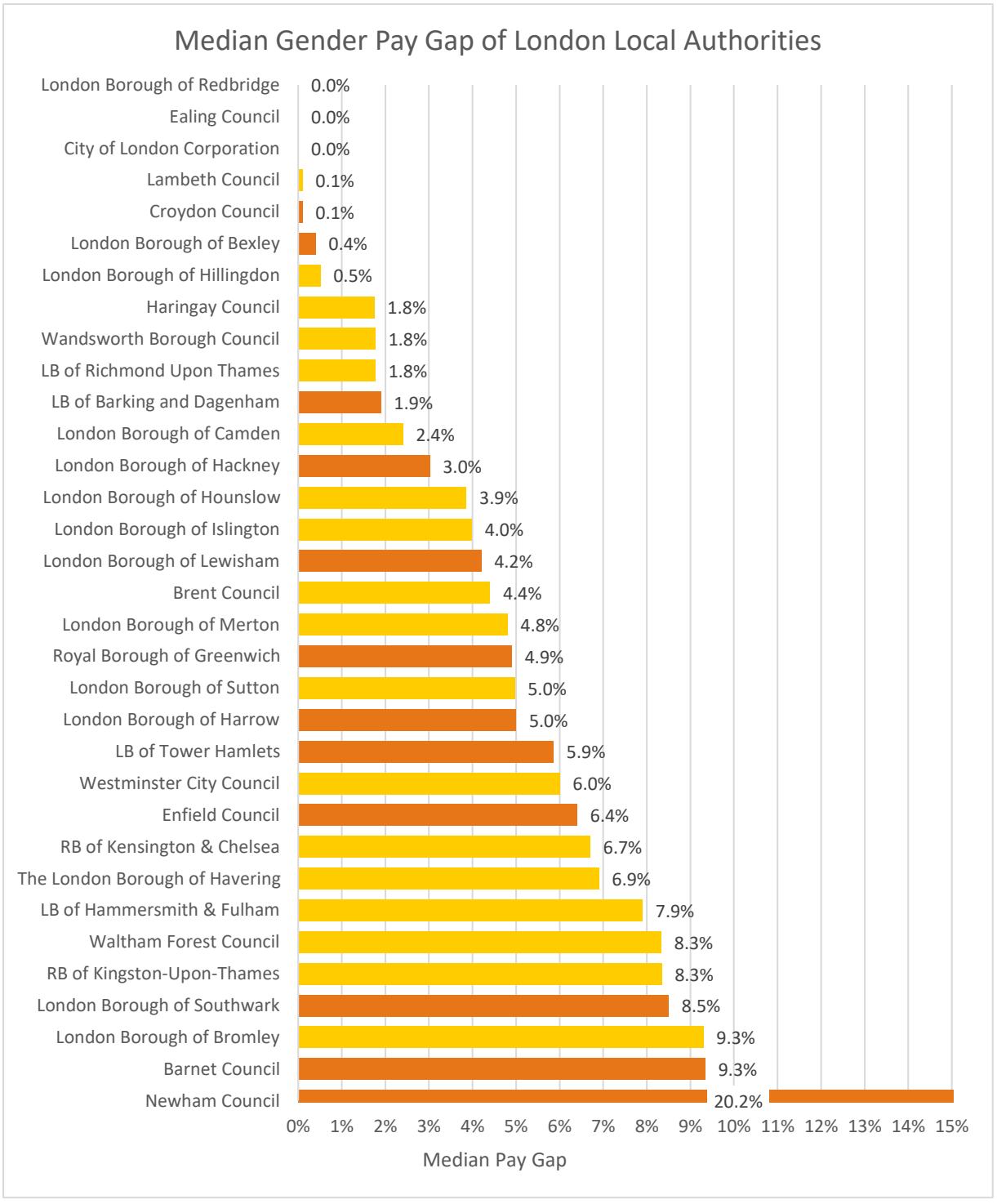
Benchmarking

The City of London Corporation has a smaller GPG than national benchmarks; the median hourly rate GPG for reporting companies for the UK's 2025/26 reporting year (based on April 2025 data), was 6.9% (down from 8.6% in 2024). These statistics are from the Office for National Statistics (ONS) and cover the period leading up to April 2025, setting the baseline for the 2025/26 reporting cycle.

We also compare 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), at the time of writing responses for 2026 are not yet available. The majority of London Boroughs report a pay gap figure of less than 5% towards men or women (20 out of 33), with 7 reporting a figure larger than the UK average (6.9%).

[2] 3.0% 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.

Figure 2: Comparison of Median Gender Pay Gap to London Local Authorities (Current)



Pay gap in favour of male employees.
Pay gap in favour of female employees.

Pay gap analysis by industrial sector shows substantial variation. In 2025, Finance and Construction recorded gaps of more than 20% (21% in 2024). By contrast, Facilities & Security, Hospitality and Local Government sectors reported gaps below 2% in both years. Not for Profit was below 2% in 2024 but has increased to 5.1% in the latest data.

Table 2: Comparison of Median Gender Pay Gap by Industrial Sector (Current)

Industry	Median gender pay gap 2024	Median gender pay gap 2025
Agriculture and forestry	2.7%	3.0%
Central government	7.4%	6.7%
Chemicals, pharmaceuticals and oil	6.1%	5.3%
Construction	22.7%	20.7%
Electricity, gas and water	10.5%	9.2%
Engineering and metals	10.3%	9.9%
Facilities, security and support services	0.3%	1.1%
Finance	21.0%	20.0%
Food, drink and tobacco	3.8%	3.7%
General manufacturing	8.0%	8.0%
Hotels, catering and leisure	0.9%	0.6%
Information and communication	14.9%	14.1%
Local government	1.5%	0.7%
Not for profit	1.8%	5.1%
Paper and printing	10.7%	9.3%
Professional and business services	10.8%	7.7%
Public education	19.9%	23.9%
Public health	5.8%	7.4%
Public safety	11.3%	11.2%
Retail and wholesale	5.0%	5.0%
Transport and storage	6.3%	5.0%

Source: Brightmine – Gender Pay Gap: Findings from Current reporting

Bonus Payments

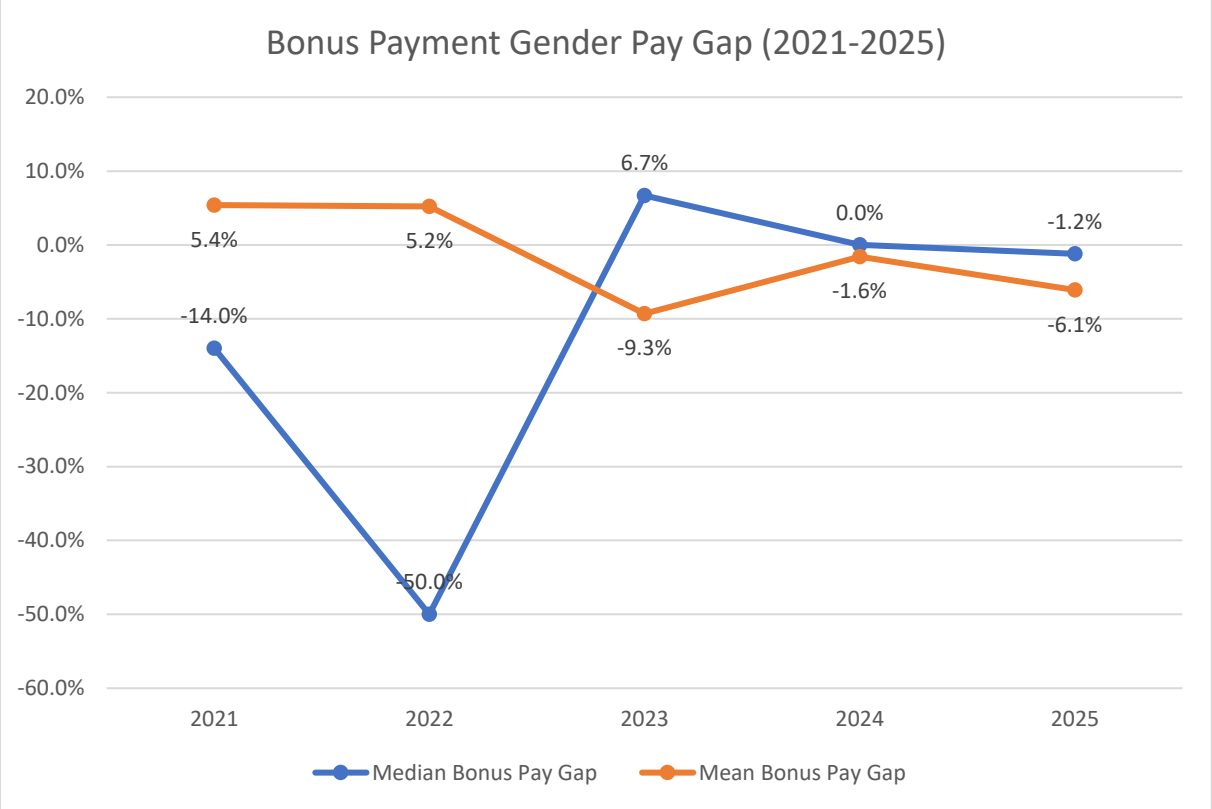
The City of London Corporation's bonus payment Gender Pay Gap for the twelve months from 1 April 2024 to 31 March 2025 is as follows:

Table 3: City of London Corporation Gender Bonus Pay Gap 2025

	2021	2022	2023	2024	2025
Median Bonus Pay Gap	-14.0%	-50.0%	6.7%	0.0%	-1.2%
Mean Bonus Pay Gap	5.4%	5.2%	-9.3%	-1.6%	-6.1%

Pay Gap Bonus Headcount paid 2025: Male 957 / Female 810
Pay Gap Bonus Headcount paid 2024: Male 121 / Female 152

Figure 3: City of London Corporation Gender Bonus Pay Gap Trend 2021-2025



	% Male	Value	% Female	Value
Median Bonus Pay Gap	35.09%	£582.90	27.65%	£590.10
Mean Bonus Pay Gap		£944.14		£1,002.10

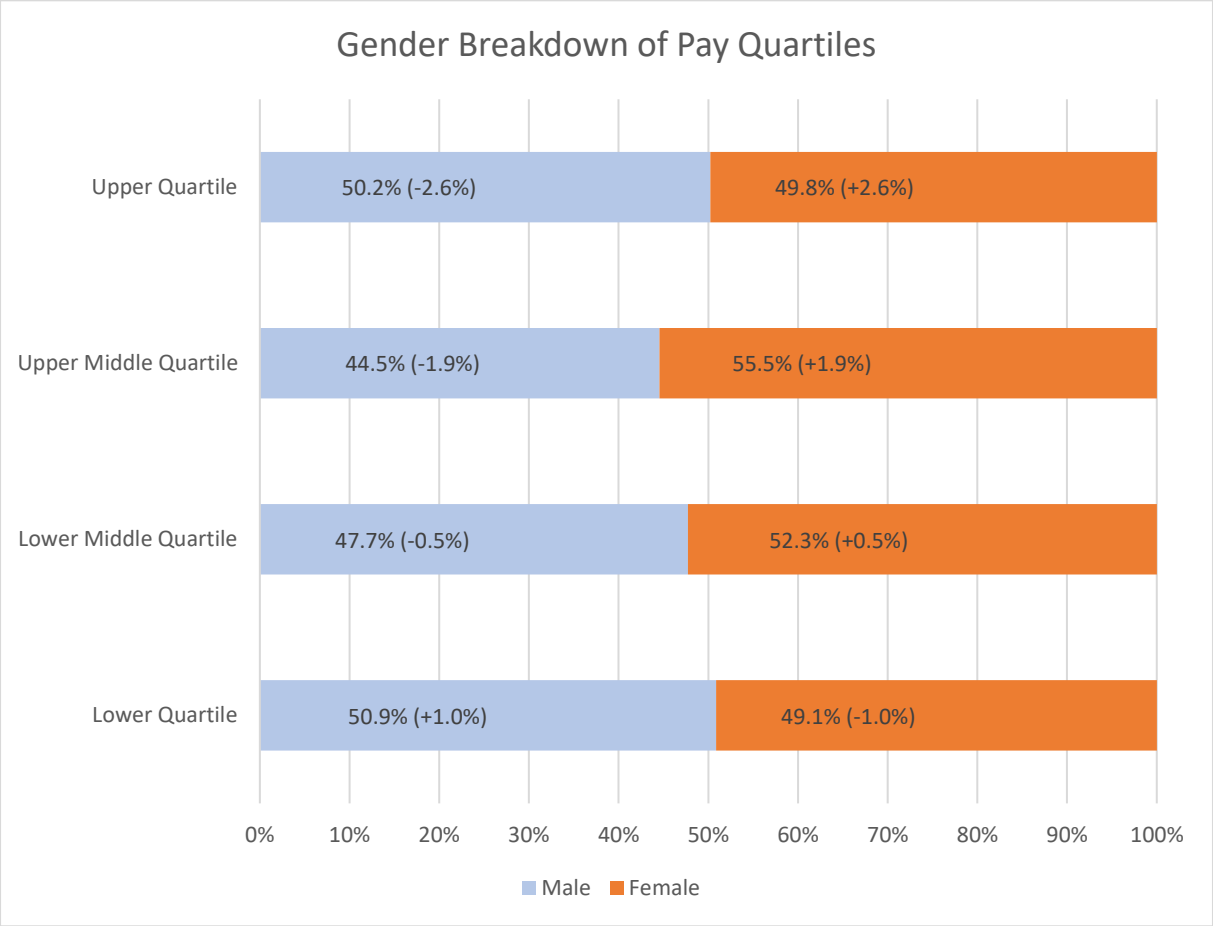
The Mean and Median Bonus gap has increased from 0.0% and -1.6% in March 2024 to -1.2% and -6.1% respectively. This means that every £1.00 a male earned as a bonus, a female received £1.06 for the snapshot date of March 2025. Bonus~~es~~ were received by 27.65% (5.8%; 5.4%; 9.0%; 26.0%) of women and 35.09% (4.7%; 5.4%; 11.1%; 34.5%) of men. Key factors that will have influenced this change is the 1.5% Contribution Pay award~~s~~ made in October 2024 to all staff on top of grades A–J.

The bonus pay gap varies annually due to workforce demographics, policy changes, performance outcomes, and economic conditions.

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 2025, with change on the previous year):

Figure 4: City of London Corporation Gender Breakdown of Pay Quartiles (2025)



The year-on-year shifts across the gender pay quartiles are relatively small. Two quartiles have moved marginally closer to a balanced 50:50 distribution, while two have shifted slightly further away. The most notable change is in the upper quartile, which has moved approximately 2% toward parity, whereas the lower quartile shows a small movement of approximately 1% away from 50:50.

Despite these small variations, the workforce overall continues to reflect an approximately equal gender split, and representation across the quartiles remains broadly aligned with this balance. The biggest pay gap is in the upper middle group, then the lower middle group. This shows the way jobs are spread across the business is still affecting pay.

These modest shifts suggest a continued positive trajectory toward a more balanced pay structure. However, the scale of movement also underscores the sensitivity of quartile analysis to minor changes in workforce composition and the likelihood of natural year-on-year variation.

5. 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 in line with this guidance (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 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 invited 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 22.5% having not disclosed. This is up slightly from 18.3% for the 31 March 2024 snapshot. Accurate analysis is hampered by the level of non-disclosure. More complete disclosure would enable more accurate calculations and allow stronger conclusions to be made.

Binary EPG Analysis

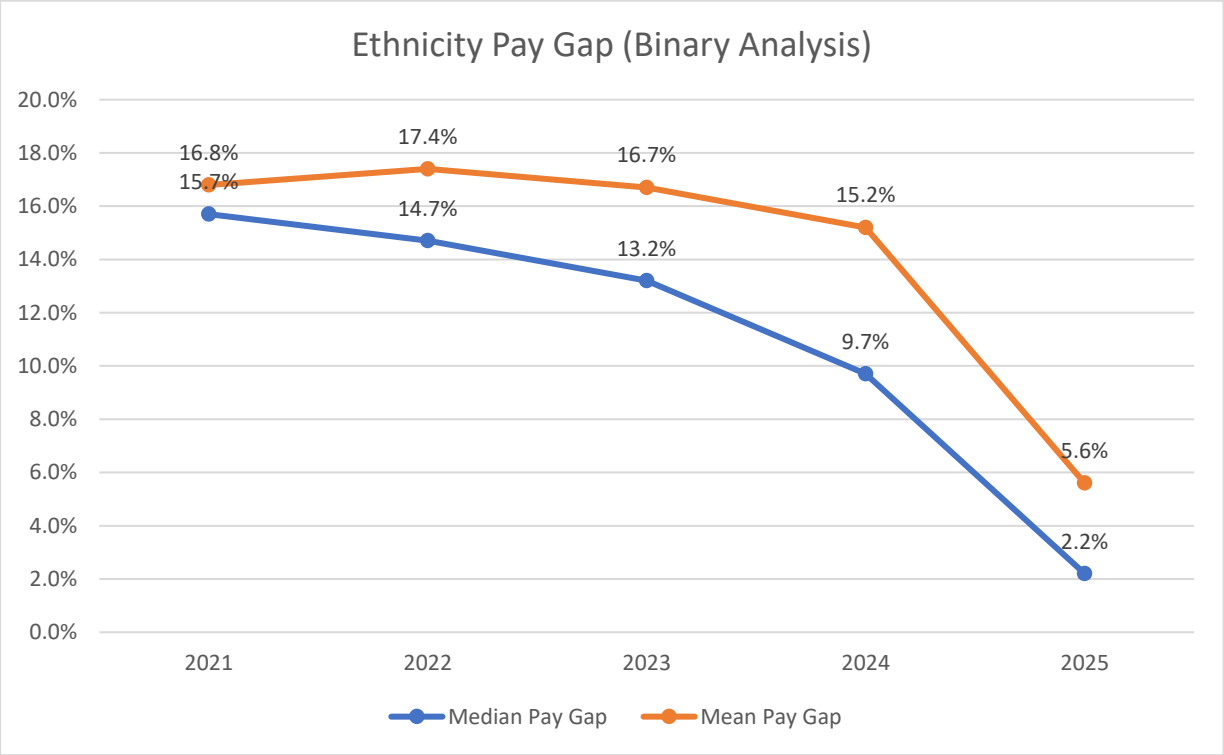
Hourly Rate

The City of London Corporation's hourly rate Ethnicity Pay Gap at the snapshot date of 31 March 2025, using binary analysis, is as follows:

Table 4: City of London Corporation Ethnicity Pay Gap 2025

	2021	2022	2023	2024	2025
Median Pay Gap	15.7%	14.7%	13.2%	9.7%	**2.2%**
Mean Pay Gap	16.8%	17.4%	16.7%	15.2%	**5.6%**

Figure 5: City of London Corporation Ethnicity Pay Gap Trend 2021-2025



The EPG for median hourly rate was 2.2% and the mean hourly pay rates 5.6% on 31 March 2025. 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 13.5% and 11.2% respectively since 2021.

This means that, on average, employees identifying as Black, Asian, Mixed, or other Ethnic Groups (OEG) in the City Corporation earn slightly less than employees identifying as White based on median and mean hourly pay rates. This translates to £0.58 less an hour for the median rate and £1.73 less an hour for the mean 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 (43% compared to c.60-68%% in the other three quartiles) and similarly a large reduction in the proportion of 'OEG' in the upper quartile (10% 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	67.2%	10.4%	22.4%	£45.19	£44.00	2.6%	£47.75	£47.14	1.3%
Upper Middle	67.5%	19.1%	13.4%	£29.19	£29.19	0.0%	£29.53	£29.48	0.2%
Lower Middle	59.7%	24.4%	15.8%	£22.73	£22.56	0.7%	£23.01	£22.91	0.4%
Lower	43.3%	18.5%	38.2%	£17.35	£17.04	1.8%	£16.96	£16.56	2.3%
Totals	**59.4%**	**18.1%**	**22.5%**	**£26.65**	**£26.07**	**2.2%**	**£30.75**	**£29.02**	**5.6%**

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

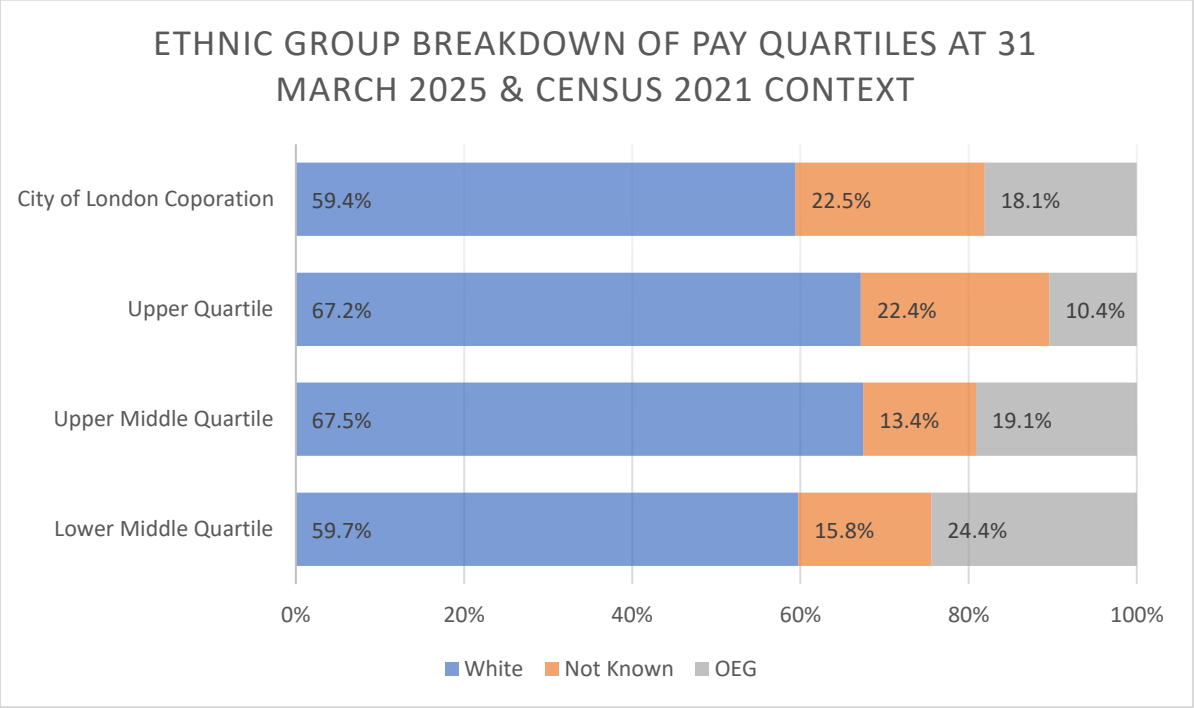
The levels of non-disclosure and the differences in proportions seen both warrant further analysis and investigation. This will help us to understand if there are actions that we should be taking to support our EEDI principles across our workforce and employee lifecycle.

The levels of non-disclosure are impacted by the large number of casual workers amongst the snapshot who fall into the lower quartile. More than half of casual workers have not disclosed ethnicity data. We will need to investigate how we can improve levels of disclosure for our casual workers who will not necessarily have the same level of access to our systems.

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 2025, alongside contextual data taken from the 2021 Census).

Figure 6: City of London Corporation Ethnicity Breakdown of Pay Quartiles (2025)



The data shows that while proportions of Black, Asian, Mixed, or other Ethnic Group employees at the overall Corporation level (18.1%) and in three of the pay quartiles (18.5%-24.4%) 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. As already identified the level of non-disclosure inhibits comparison.

The proportion of White employees is below the England and Wales census 2021 benchmark (81.7%) overall and at all quartiles, but slightly above that of the London Census 2021 benchmark (53.8%; except for the Lower Quartile 43.3%). The proportion overall, and at three of the four quartiles are relatively close to the City of London Census benchmark (69.4%), varying by 10% from the benchmark. However, the same is not true at the lower quartile, being 26.1% 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 38.2% 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 current snapshot date Camden reported a median hourly EPG of 12% (12.6%) and a mean hourly EPG of 11.5% (12%)[3].

Based on other recent findings and Pay Gap published data reports, London borough ethnicity pay gaps show White employees are generally paid more than Black, Asian, and OEG staff. Key findings have included:

- Tower Hamlets Council: Black, Asian and Multi-Ethnic employees (their terminology) earn 7.26% less (mean) and 6.95% less (median) than White employees.
- London Borough of Hammersmith & Fulham: Mean ethnicity pay gap is 9.8% (down from 11.7% the previous year); median gap is 10.5%.

These comparisons suggest that the City of London Corporation's 2025 ethnicity pay gap compares favourably with the London boroughs cited above. With a mean pay gap of 5.6% and a median pay gap of 2.2%, the Corporation reports materially lower gaps than the published figures for Camden, Tower Hamlets and Hammersmith & Fulham, indicating stronger ethnicity pay equity outcomes.

Changing legislation will mandate ethnicity and disability pay gap reporting under the Equality (Race and Disability) Bill. In the future this will provide much stronger basis for benchmarking and comparison. While the government has confirmed the commitment, the exact timeline for implementation is not set, though measures are expected to be introduced from 2027, with the first reporting deadline potentially in 2028.

[3] London Borough of Camden pay gap report | Open Data Portal

Bonus Payments

The City of London Corporation's bonus payment Ethnicity Pay Gap for the twelve months from 1 April 2024 to 31 March 2025, using binary analysis, is as follows:

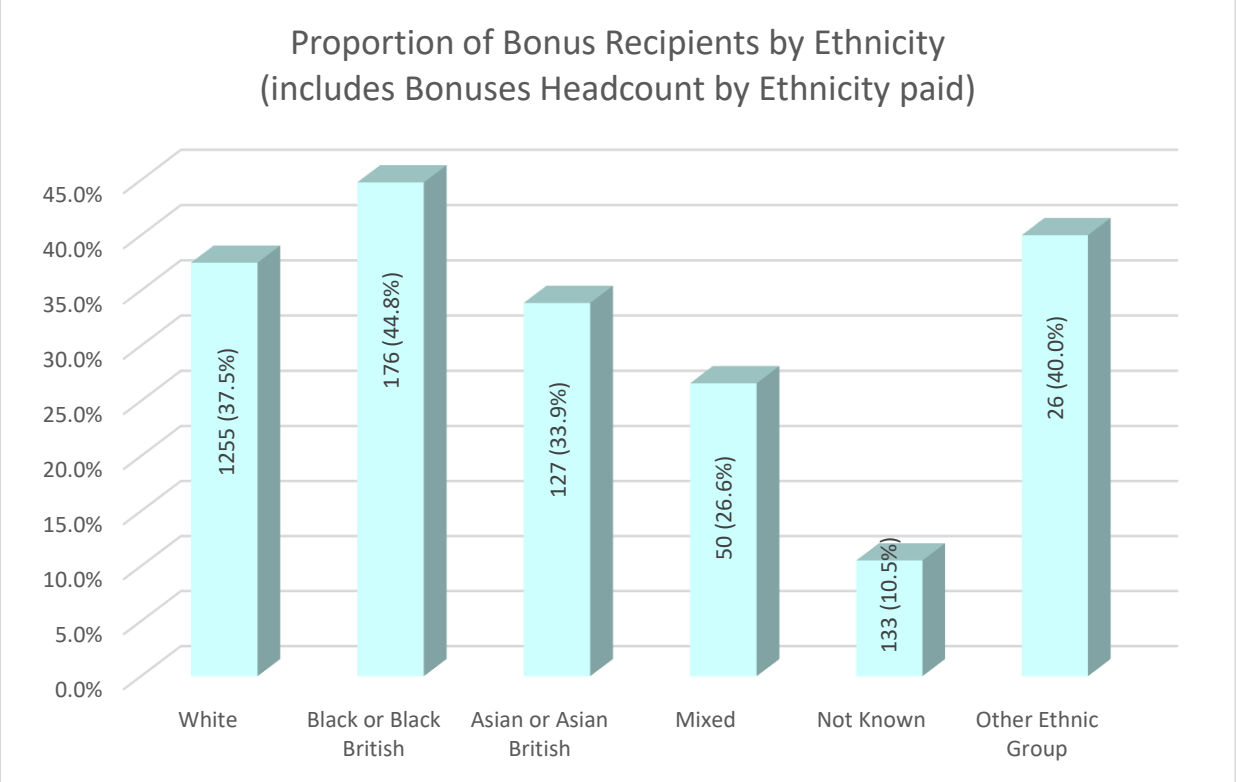
Table 6: City of London Corporation Ethnicity Bonus Pay Gap (2025)

	2021	2022	2023	2024	2025
Median Bonus Gap	49.9%	40.0%	-60.0%	14.5%	**0.0%**
Mean Bonus Gap	22.2%	24.4%	-0.7%	6.2%	**-3.0%**

The City Corporation's median ethnicity bonus pay gap shifted from 14.5% more for White employees in 2024 to 0.0% in 2025, indicating parity between the two groups. Similarly, the mean bonus gap moved from 6.2% in 2024 to -3.0% in 2025, reflecting a reduction in the overall reported gap and a reversal from the previous year. This means that employees from ethnic minority backgrounds, on average, received more bonus payments than White counterparts.

The reintroduction of Contribution Pay scheme for grades A–J during the reporting period, resulted in a substantial increase in total number of bonus payments awarded. A 1.5% Contribution Pay award for employees at the top of the grade was allocated across all workforce groups.

Figure 7: City of London Corporation Breakdown of Bonus Pay received by Ethnicity (2025)



Aggregated Category EPG Analysis

Hourly Rate

The City of London Corporation's hourly rate of pay at the snapshot date of 31 March 2025, broken down into aggregated ethnicity categories, is as follows:

Table 7: City of London Corporation Ethnicity Aggregated Analysis: Median Pay Gap (2025)

Ethnic Category	Black	Asian	Mixed	OEG
White	17.5%	4.4%	6.5%	12.9%
Black		-13.1%	-10.9%	-4.5%
Asian			2.2%	8.6%
Mixed				6.4%

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

Table 8: City of London Corporation Ethnicity Aggregated Analysis: Mean Pay Gap (2025)

Ethnic Category	Black	Asian	Mixed	OEG
White	16.5%	12.2%	10.9%	24.7%
Black		-4.3%	-5.6%	8.3%
Asian			-1.4%	12.5%
Mixed				13.9%

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

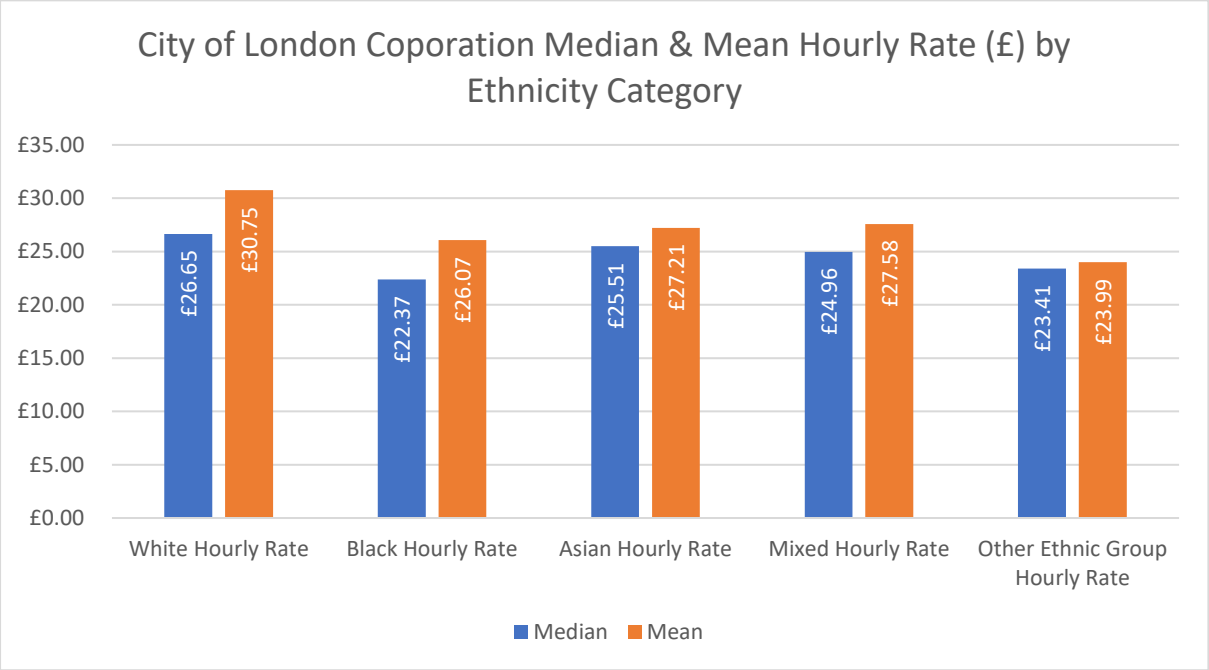
Analysis at the aggregated level requires comparison of the 5 ethnic categories against each other which results in 10 ethnicity pay gap figures to report on for each of the median and mean analysis. This provides some greater insight into the aggregated ethnic categories, although at the same time providing 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 17.5% (median pay gap) more than employees identifying as Black, which is an increase of 1.4% from March 2024 16.1% figure. However, negative figures indicate a pay gap in favour of the ethnic category at the top of the table. So, employees identifying as Asian receive 4.3 (4.2% March 2024), mean pay gap, more than employees identifying as Black.

Overall, there is a large range in the ethnicity pay gaps observed. The largest being 24.7% (Mean Pay Gap: White category compared to Other Ethnic Groups category), however, this has slightly decreased from March 2024 Mean Pay Gap of 25.8%. 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. In the Median Pay Gap analysis the Black category is receiving lower rate of pay in comparison to other groups. In the Mean Pay Gap analysis the Other Ethnic Groups category is receiving a lower rate of pay compared to the other groups.

Table 9: 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	£26.65	£22.37	£25.51	£24.96	£23.41
Mean	£30.75	£26.07	£27.21	£27.58	£23.99

Figure 8: City of London Corporation Median and Mean Hourly Rate by Ethnicity (2025)



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 £1.14 less for employees identifying as from an Asian background (63p less than March 2024 of £1.77), to £4.28 less for employees identifying as black, and £3.24 for other ethnic background (48p more and 56p less respectively from the March 2024 figure of £3.80 for both groups). For mean pay, the differences are larger, with the lowest being £4.68 less for employees identifying as from ~~a~~ black background, (£1.63 increase in the pay gap of March 2024 which was £3.05), to £6.76 less for employees from an Other Ethnic group category, no change from the March 2024 figure.

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 2025, alongside contextual data taken from the 2021 Census)

Table 10: Ethnicity Aggregated Analysis – Pay Quartile Distribution and Benchmarking

	White	Black	Asian	Mixed	OEG	Not Known
Upper Quartile	67.19%	3.69%	3.76%	2.63%	0.36%	22.37%
Upper Middle Quartile	67.47%	6.39%	8.45%	3.20%	1.07%	13.42%
Lower Middle Quartile	59.73%	9.38%	9.16%	4.12%	1.78%	15.84%
Lower Quartile	43.25%	8.45%	5.26%	3.41%	1.42%	38.21%
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%

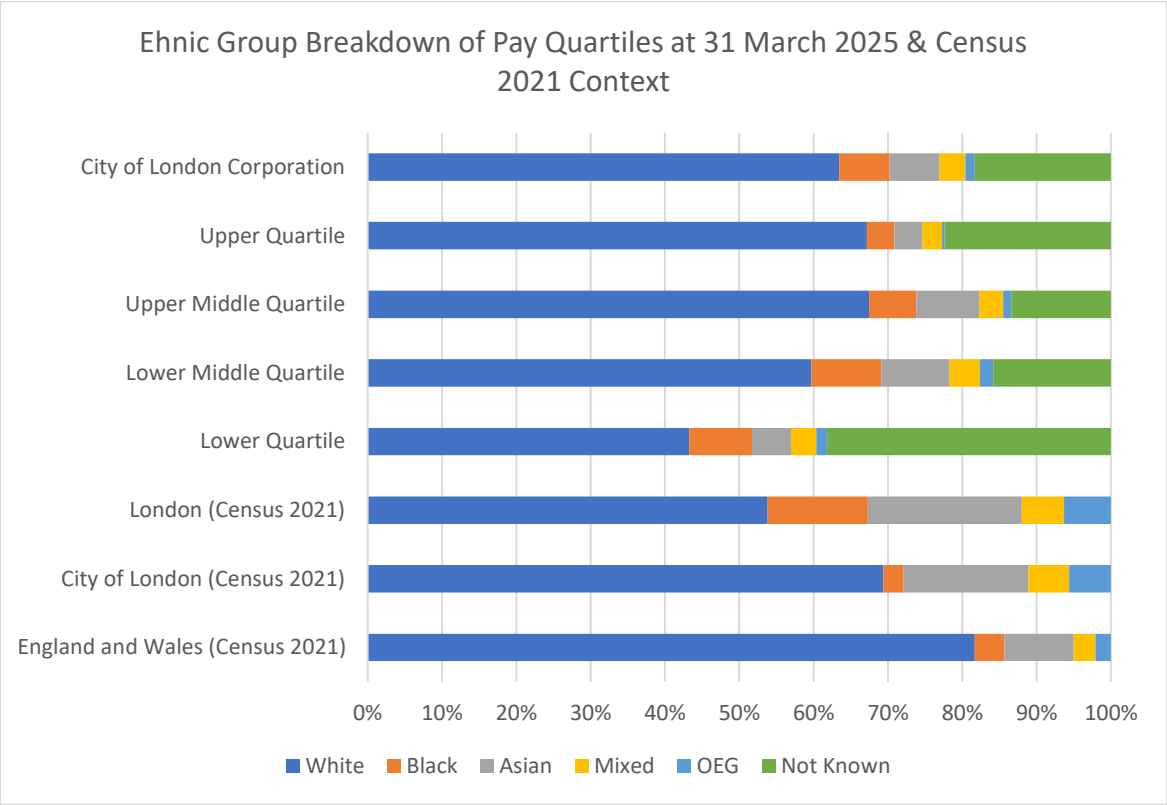
Key: *Pink is lower representation; Orange is higher representation compared to the City of London Corporation total*

There has been a minimal change of the proportion of staff at each quartile from March 2024. 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, there is a much smaller proportion of employee numbers in the upper quartile than in the other three quartiles and compared to total proportion. However, the representation of Black and Asian staff in the upper quartile, has increased by 1% from last year, (2.6% and 2.9% respectively), and Mixed has fallen to 2.63% (3.0% 2024). Black, Asian, Mixed and Other ethnicity staff make up just 10% of the overall workforce in the upper quartile.

There is no consistent pattern across the aggregated categories: the proportion of employees identifying as Black continue to be heavily weighted towards the two lowest quartiles; whereas employees identifying as Asian maintain higher proportions in the two middle quartiles; the proportions of employees identifying as mixed remain relatively consistent across all quartiles; while Other Ethnic Groups proportions are small overall, there is a small increase in proportion moving from upper top lower quartiles. 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 9: City of London Corporation Ethnicity Breakdown of Pay Quartiles (2025)



Disability Pay Gap

Definition

There are currently no UK Government requirements or detailed statutory guidance for calculating the Disability Pay Gap, and there is no national benchmark comparable to statutory Gender Pay Gap reporting. The City of London Corporation therefore reports its Disability Pay Gap on a voluntary basis, drawing on disability information that employees choose to share through the organisation's HR systems. In line with the approach used by a number of organisations that report voluntarily, the analysis in this report compares employees who identify as disabled with employees who identify as non-disabled. As with other pay gap measures, this is distinct from equal pay: it does not compare employees doing the same or similar work, or work of equal value. Consistent with the language and framing reflected in Business Disability Forum research and wider organisational practice, these figures should be understood as one indicator of workplace equality rather than a complete measure of inclusion. They can help identify patterns in pay and representation, but they do not in themselves explain why those patterns exist, measure the day-to-day experience of disabled employees, or determine whether an individual meets the definition of disability under the Equality Act 2010.

Analysis of pay data by disability is constrained by a relatively high number of unknowns and includes staff who 'prefer not to say'. For the snapshot date of 31 March 2025, the level of non-disclosure for disability data for all City Corporation employees has unfortunately increased to 31.55% (28.1% in 2024).[4] As with all aspects it is important that we continue to improve declaration rates and exploit new systems and technology to facilitate this.

Hourly Rate

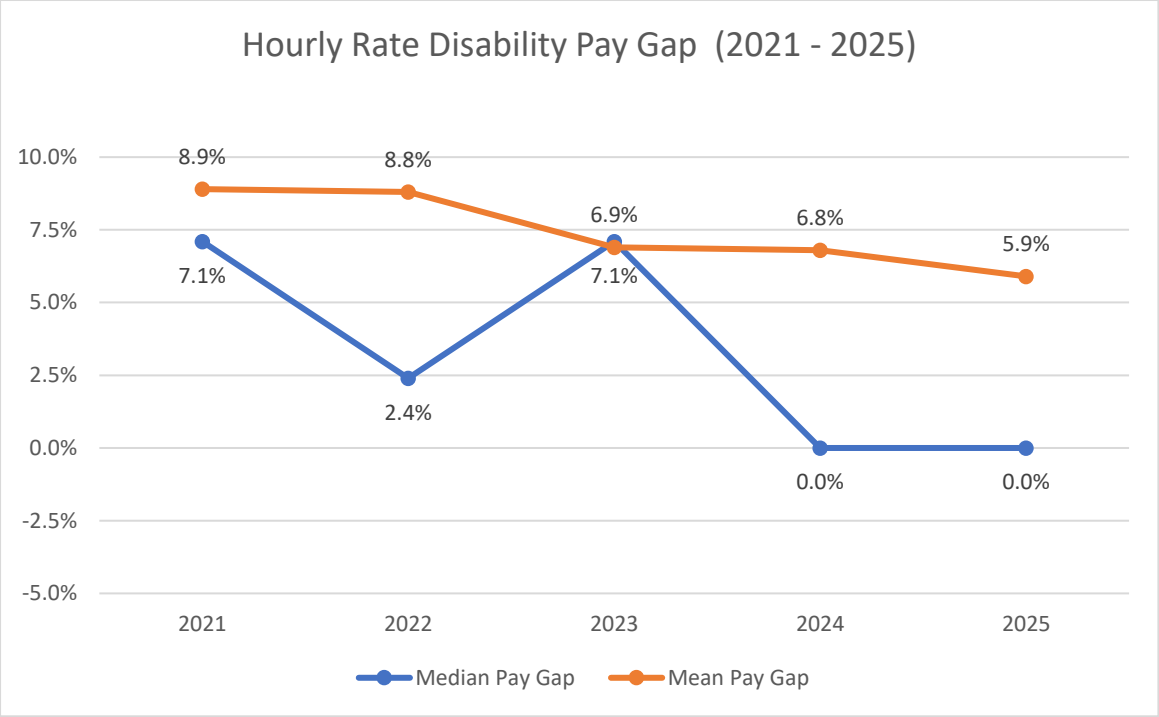
The City of London Corporation's hourly rate Disability Pay Gap at the snapshot date of 31 March 2025 is as follows:

Table 11: City of London Corporation Disability Pay Gap 2025

	2021	2022	2023	2024	2025
Median Pay Gap	7.1%	2.4%	7.1%	0.0%	**0.0%**
Mean Pay Gap	8.9%	8.8%	6.9%	6.8%	**5.9%**

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

Figure 10: City of London Corporation Disability Pay Gap Trend 2021-2025



The median hourly rate DPG remains at 0.0% on 31 March 2025 and no differential has been reported between those identifying as Disabled and Not Disabled on this measure.

The DPG for mean hourly pay rates stood at 5.9% on 31 March 2025. This is a 1% decrease on the previous year (6.8%), and continues the downward trend of recent years, with the mean DPG narrowing by 3.0% since 2021. However, the mean pay data does still indicate that employees who identify as disabled are on average paid less than employees who identify as not disabled.

Table 12: City of London Corporation Disability Pay Gap - Breakdown by Quartiles 2025

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	67.54%	5.61%	26.85%	£45.05	£43.93	2.5%	£48.11	£45.89	4.6%
Upper Middle	66.26%	7.24%	26.49%	£29.19	£29.19	0.0%	£29.57	£29.43	0.5%
Lower Middle	62.71%	6.96%	30.33%	£22.37	£23.41	-4.6%	£22.88	£23.23	-1.5%
Lower	51.78%	5.68%	42.54%	£17.35	£17.14	1.2%	£17.00	£16.64	2.1%
Totals	**62.07%**	**6.37%**	**31.55%**	**£26.07**	**£26.07**	**0.0%**	**£30.31**	**£28.51**	**5.9%**

Looking at the proportion of employees across the quartiles, the numbers are broadly consistent, with a marginal change from March 2024 figures. However, the high rates of non-disclosure at all quartiles hampers 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 2024 to 31 March 2025 is as follows:

Table 13: City of London Corporation Disability Bonus Pay Gap 2025

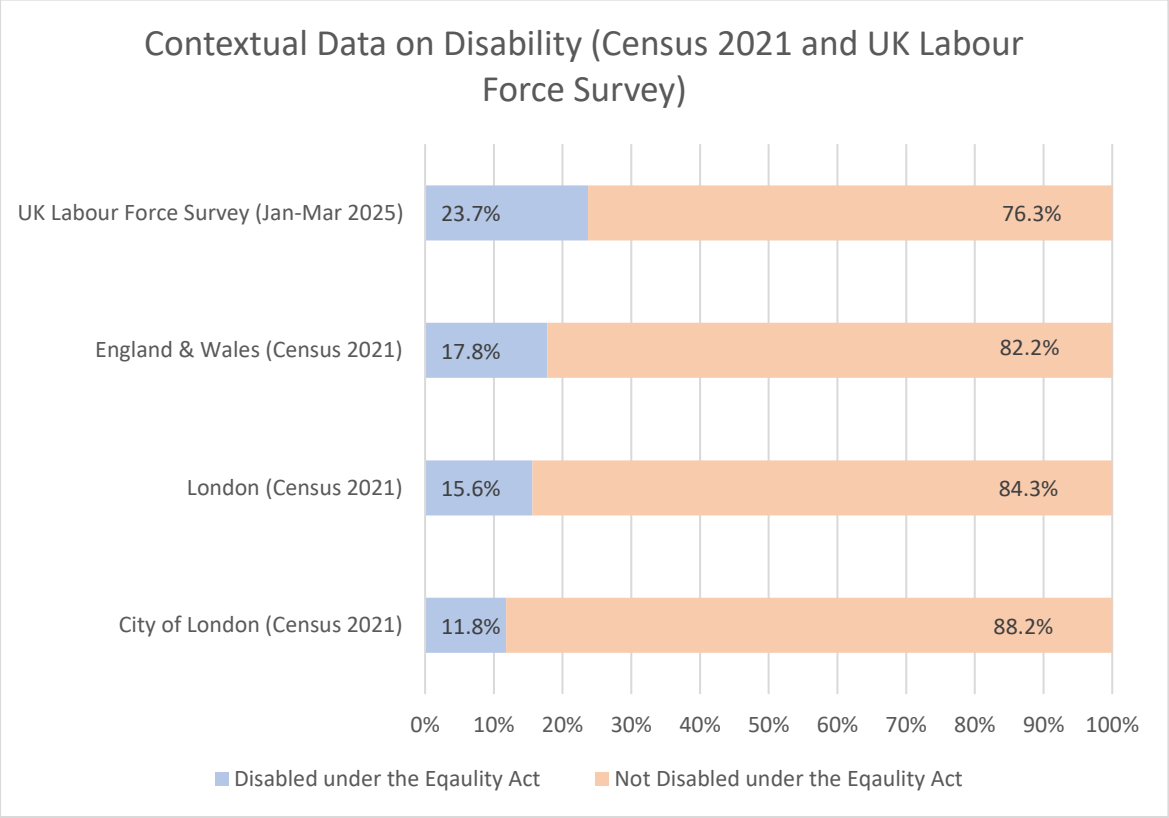
	2021	2022	2023	2024	2025
Median Bonus Gap	16.8%	-35.3%	-4.0%	0.0%	**0.0%**
Mean Bonus Gap	-4.3%	-31.4%	32.6%	-40.1%	**-21.2%**

Disability Pay Gap Bonus Headcount: Not-Disabled 1328 / Disabled 139 / Not Known 300

The median bonus DPG is unchanged at 0.0% from March 2024.. The mean bonus payment DPG has, except for 2023, generally been in favour of those identifying as disabled. The mean disability bonus gap figure for 2025 is -21.2%, a decrease of 18.9% from 2024 (-40.1%), which was the largest disparity in recent years. While the data indicates that disabled employees, on average, receive higher bonus payments as reflected by a negative pay gap, there remains ongoing challenges in ensuring consistent reporting and in fully understanding the impact of intersectional factors.

The City of London implemented a 1.5% discretionary bonus (contribution payment) for all staff on top of grades A–J in October 2024; during the reporting period, 38.72% of employees who identified as disabled received some type of bonus, slightly higher than the 37.99% of non-disabled employees and notably above the 16.88% of those with undisclosed status.

Figure 11: Contextual Data Representation



6. Conclusion and Next Steps/Action Plans

Overall, the pay gap figures reported remain broadly consistent with those from previous years, with some small shifts compared to March 2024. The only exception being the Bonus pay gaps, which have primarily been driven by the number of people receiving bonuses due to the operation of the Contribution Pay Scheme during the snapshot reporting period.

Generally, these shifts seem to be indicative of a longer-term positive trend in all pay gap figures. However, because the calculations are based on a yearly snapshot, the group of employees included will vary each year. As a result, some year-on-year differences may be due to normal changes in the snapshot data, rather than changes in pay practice. Common reasons include:

- **Joiners and leavers:** people start, resign, retire, or are made redundant between snapshot dates.
- **Role and hours changes:** promotions, transfers, or moving part-time/full-time can change who is counted in which group (and sometimes how they're weighted).
- **Absences and status rules:** depending on the method, people on parental leave, long-term sick leave, or secondment may be included/excluded or treated differently.
- **Data timing/clean-up:** late HR updates, backdated contract changes, or corrections can mean the dataset looks slightly different year to year.
- **Different "who counts" definitions:** small rule choices (e.g., employees vs casuals, professors,) can shift headcount.

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 fair 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 advance our EEDI commitments and strengthen equitable progression across the organisation, we will take a strategic, evidence-based approach to reducing barriers and improving pay equity. Our priorities include:

- **Modernising pay structures and reward governance**

Review and refine our pay and reward architecture to promote clarity, fairness, and proportionality. We will limit reliance on additional payments and strengthen governance where such payments are required, ensuring alignment with strategic workforce and reward objectives. We will also ensure our benefits offer remains competitive and attractive.

- **Strengthening equitable access to roles and progression pathways**

Ensure that our recruitment, engagement, and progression practices actively enables participation from the widest talent pool. This includes widening outreach, modernising candidate attraction channels, enhancing flexible working support, and

creating a recruitment experience that enables fair access and sustained progression across the organisation.

- **Enhancing Data Collection and Disclosure**

Encourage employees to update disability status and other protected characteristics through secure, confidential self-service platforms to support more accurate analysis. Although gender pay reporting is mandatory, ethnicity reporting is not, reducing comparability and statistical robustness. Improving disclosure rates is essential. Further consideration may also be needed on whether separating data for casual workers - who are concentrated in lower quartiles - would improve clarity.

Recommendations Aligned to the People Strategy

1. Fair and Transparent Reward

1.1 Strengthen Data Quality and Disclosure

- Strengthen workforce data quality and completeness by monitoring disclosure rates, identifying gaps, and taking targeted action to improve reporting confidence across the organisation. Building trust in how data is collected, protected, and used will be critical to increasing confidence and participation.
- Encourage employees to update disability, ethnicity, and other protected characteristic information through secure self-service systems, supported by clear communication on how information is used, protected, and applied.
- Promote robust self-service data governance so employees maintain up-to-date personal and sensitive information.
- Use intersectional analysis to strengthen understanding of how reward, role clarity, and progression are experienced across different groups and to inform future action.

1.2 Ensure Consistency in Pay and Bonus Structures

- Review how changes in bonus design, including fixed-sum and percentage-based approaches, may affect gender, ethnicity, and disability pay gap outcomes
- Strengthen governance around payment classification so that one-off payments, allowances, and recognition awards are applied consistently, to ensure no distortion of bonus reporting and ultimately pay gap analysis.
- Keep all bonus arrangements under review to ensure that revised or new schemes do not introduce unintended bias, including disproportionate effects on part-time employees or lower-paid groups.
- Undertake equality impact assessment as part of the design and review of reward arrangements to support fair and proportionate outcomes.
- Communicate reward schemes clearly so that employees understand their purpose, structure, and relationship to performance and contribution.

2. Clear Career Paths & Opportunity (Ambition 25 Pillar: Career Development & Progression)

2.1 Support Inclusive Progression and Representation Across Pay Quartiles

- Review the impact of the casual workforce within the lower quartile and consider whether separate analysis would provide clearer insight into underlying workforce patterns.
- Strengthen representation of underrepresented groups in higher-paid quartiles by supporting transparent, accessible, and equitable progression pathways.
- Identify disparities in representation across quartiles, particularly in relation to ethnicity and disability, and use this evidence to address structural barriers to progression.

2.2 Strengthen intersectional Workforce Insights

- Analyse combined characteristics, for example ethnicity, disability, and gender, to improve understanding of intersectional barriers to progression.
- Use these insights to inform targeted development activity and improve access to progression opportunities.

3. Inclusive Culture (Ambition 25 Pillar: Positive Working Culture & Employee Experience)

3.1 Build Trust in Data Disclosure

- Communicate clearly how sensitive data is used, protected, and applied to support inclusion, trust, and evidence-based decision-making.
- Address concerns relating to privacy and stigma proactively to strengthen confidence in self-reporting.

3.2 Improve Communication and Engagement

- Use accessible and supportive communications to explain the purpose of collecting disability and ethnicity data and the value of disclosure.
- Deliver targeted engagement activity to improve disclosure rates among underrepresented groups and strengthen wider participation in EEDI activity.

4. Evidence-Based Workforce Decisions (Ambition 25 Pillar: Data-Driven Insight & Governance)

4.1 Strengthen Systems & Reporting Infrastructure

- Improve reporting consistency and data integrity so that workforce analysis can better inform reward, progression, and organisational decision-making.

4.2 Monitor, Report and Act

- Oversee an organisation-wide plan to improve disclosure and strengthen the completeness and consistency of protected characteristic data.

- Strengthen monitoring of disclosure rates, including for disability and ethnicity, to support higher-quality EEDI data and reinforce transparency in reward practices.
- Use improved data quality to deliver deeper analysis and inform evidence-based decisions across recruitment, reward, progression, and workforce planning.

4.3 Prepare for Legislative Change

- Prepare for the introduction of mandatory ethnicity, race and disability pay gap reporting under the Equality (Race and Disability) Bill.
- Begin developing the action planning and reporting arrangements needed to respond effectively to future equality reporting requirements coming into force from January 2027 under the Employment Rights Act 2025.
- Strengthen reporting processes so they can support greater transparency, intersectional analysis, and compliance.
- Ensure that internal systems, governance arrangements, and data management processes are sufficiently robust to support high-quality equality reporting.
- Continue to prioritise improvements in disclosure rates and the completeness, accuracy, and consistency of equality data.

5. Strengthen Organisational Communication (Cross-cutting Ambition 25 Theme)

5.1 Reinforce EEDI Commitments

- Communicate regularly on EEDI priorities, activity, and progress, including through the publication of workforce equalities reporting.