Croydon Council Disability Pay Gap Report

Based on data collected on 31st March 2024

Published: June 2025

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Summary of Report

This report examines the disability pay gaps for Croydon council calculated as mean and median figures.

The council's disability pay gap (as of 31st March 2024) calculated as **a** mean figure was 0.4%. The council's disability pay gap calculated as a median figure was 0.0%.

This means that the mean disability pay gap has reduced by 1.5% from 2023 - 2024 whilst the median disability pay gap has remained at 0.0%.

In 2024 (like 2023) disabled staff are being paid a lower average hourly rate than non-

Disability pay gap	2024	2023	2022
	(data as of 31st March)	(data as of 31st March)	(data as of 31st March)
Mean ordinary hourly pay gap	0.4%	1.9%	-1.2%
Median ordinary hourly pay gap	0.0%	0.0%	0.0%

disabled staff as a mean pay calculation, and there is no pay gap for average hourly pay rates between disabled and non-disabled staff as a median pay calculation.

Changes in disability pay gaps	2023 - 24	2022 - 23
Mean	-1.5%	+3.1%
Median	No change (0.0%)	No change (0.0%)

Disability Quartiles (disclosed only)	Disabled	Non-Disabled
Upper (top ¼): 2024	10%	90%
Upper (top ¼): 2023	10%	90%
Upper Middle: 2024	11%	89%
Upper Middle: 2023	12%	88%
Lower Middle: 2024	12%	88%
Lower Middle: 2023	11%	89%
Lower (bottom 1/4): 2024	10%	90%
Lower (bottom 1/4): 2023	10%	90%

The representation of disabled and non-disabled employees within all pay quartiles shows similarity with the workforce representation for disability in 2024 (10%).

Croydon council's disability pay gaps are lower than the average UK disability pay gap of 17.2% (*TUC 2024*) and lower than London Council averages reported (0.7% mean; 1.1% median, based on 53% of boroughs reported) for 2024.

With the disability pay gap remaining at 0.0% for the median calculation, Croydon council has also achieved Objective 4, within the <u>Equality Strategy 2023 – 2027</u>, which stated that: "Gender and disability pay gaps in the Council remain at zero and the ethnicity pay gap continues to reduce and remains below the London average".

The non-disclosure rate for employees in scope for disability pay gap reporting has decreased by 1% from 2023-2024 (and by 4% overall from 2022).

The council takes the improvement of protected characteristics disclosure rates seriously and constantly aims to improve levels by contacting and encouraging staff in low disclosure areas and highlighting how equality information is used via deploying information campaigns throughout the year.

The council also aims to continue to reduce pay gaps differences between majority and minority groups by implementing specific objectives outlined in the <u>People and Cultural Transformation Strategy 2022 – 2026</u>, especially Pillar 2, workforce EDI.

Croydon Council workforce characteristics compared to Croydon's resident population:

Sex:

	Female	Male
Croydon Council – all workforce (March 2024)	69%	31%
Croydon Residents: ONS Census 2021	52%	48%

Ethnicity:

Name	Asian/ Asian British %	Black/African/C aribbean/Black British %	Mixed/multiple ethnic groups %	Other ethnic group %	White ethnic groups (%)
Croydon council -all workforce (disclosed) (March 2024)	9%	33%	6%	5%	48%
Croydon Residents: ONS census 2021	17%	23%	8%	4%	48%

Disability:

Croydon Council: all workforce disclosed disability March 2024(%)	10%
Croydon residents disclosed disability: ONS census 2021(%)	14%

Introduction

1. What is a disability pay gap?

The disability pay gap compares the average hourly pay of disclosed disabled employees and non-disabled employees. All eligible roles within the council are examined and the pay gap analysis aims to find out if non-disabled employees are on average occupying higher paying roles than disabled employees. Pay gap analysis for this purpose is **not** a comparison of pay between people doing the same work.

2. Understanding the pay gap information

2.1 Pay gap percentages

The pay gap data can show positive and negative percentages depending on whether the gap being measured is higher or lower for one group compared to the other.

In this report the percentage gap represents the degree to which the average mean or median hourly pay rates for disabled employees are higher or lower than the same payments for non-disabled employees.

2.2 Ordinary hourly rate

The ordinary hourly pay rate includes:

- Basic pay
- Allowances (see Appendix 2)
- Shift premium pay

It does not include:

- Employees on maternity leave, long term sick leave, or other types of reduced pay
- Overtime payments

The calculation is based on contractual weekly hours. This gives a direct comparison between employees' hourly pay, regardless of whether they work full-time or part-time.

2.3 Mean and median calculations

- Mean calculation: adding a range of numbers together and dividing the total by how many numbers there are (often referred to as the average).
- Median calculation: using the middle value in a range of numbers (which is better measure for skewed distributions).

2.4 Pay quartiles

Pay quartiles are calculated by:

- Ordering employees by their ordinary hourly pay rate.
- Dividing the employees into four groups, each with an equal number of employees each group is a quartile. This creates four equally sized pay bands ranging from the lowest paid 25% (bottom 1/4) of employees to the highest paid 25% (top 1/4) of employees.
- Upper pay quartile is the top 25% or top quarter of paid employees.
- Upper middle pay quartile is the second highest quarter grouping of paid employees.
- Lower middle pay quartile is the third highest quarter grouping of paid employees.
- Lowest quartile is the bottom quarter grouping of all paid employees.

Quartiles allow Croydon Council to compare the spread of groups of employees by their pay including allowances and shift pay. It also allows us to compare all council employees across our various grade structures.

2.5 'One-off payments' pay gap percentages

For pay gap reporting, one-off payments are defined as payments given for specific recruitment and retention purposes (e.g., social workers) and payments relating to profit sharing, productivity, performance, incentive, and commission (e.g., enforcement agents). These payments are identified by the terminology of 'bonuses' within the pay gap reporting regulations.

3. Limitations to disability pay gap data reporting

It should be noted that there are significant limitations to the figures reported for disability pay gaps which may make it difficult to draw definitive conclusions.

The reporting of disability pay gaps is based on the same principles as gender pay gap reporting which means that individuals in scope on the 'snapshot' date of 31st March 2024 will include 'casual' workers for whom no disability status data is held.

The level of non-disclosure for disability within employees may also have caused significant distortions in reporting a mean and median pay gap figure (see 4). However, the council does take the improvement of disclosure levels

seriously and constantly aims to improve figures by describing how equality information is used by deploying a variety of information campaigns throughout the year.

Disability pay gaps can also vary by type and degree of disability of individuals so an overall pay gap figure for all types of disability may not be fully representative (EHRC – pay gaps explained)

4. Data reporting and disclosure

In accordance with pay gap reporting guidelines, Croydon Council included 3,540 people in the scope as eligible for reporting on 31st March 2024.

As of 31st March 2024, the percentages for declared disability status within the council's workforce (employee) profile were:

- 8% disabled
- 70% non-disabled
- 20% non-disclosed disability status
- 2% prefer not to say

Figure 1 (below) shows the non-disclosure rates for disability for the pay gap reporting as of 31st March 2024 compared to 2023.

	31 st March 2024	31 st March 2023
Non-disclosure	23%	24%
rate – disability pay		
gap reporting		

Figure 1: Table showing non-disclosure rates for disability pay gap reported staff as of 31st March 2024 and 2023

5. RESULTS

5.1 Ordinary hourly pay gap for disability

Figure 2 (below) shows the mean and median hourly pay gaps for Croydon disclosed disabled and disclosed non-disabled employees from 2021 – 2023.

All disability mean and median pay gap figures were low in the 2021 - 2023 period with both numbers either slightly above, the same as, or below 0%.

(% that average pay for declared disabled employees is higher or lower than for declared non-disabled employees)	2024 (data as of 31 st March)	2023 (data as of 31 st March)	2022 (data as of 31 st March)
Mean ordinary hourly pay gap	0.4%	1.9%	-1.2%
Median ordinary hourly pay gap	0.0%	0.0%	0.0%

Figure 2: Table showing mean and median ordinary hourly pay gaps for Croydon staff calculated for disabled and nondisabled employees from 2022-24

Figure 3 (below) shows that in 2021-22 the mean pay gap had decreased by 2.0% and the median pay gap remained at 0.0%. However, in 2022-23, the mean pay gap increased by 3.1% whilst the median pay gap remained at 0.0%. In 2023 -24, the mean pay gap has decreased by 1.5% with the median pay gap remaining at 0.0% for a fourth consecutive year.

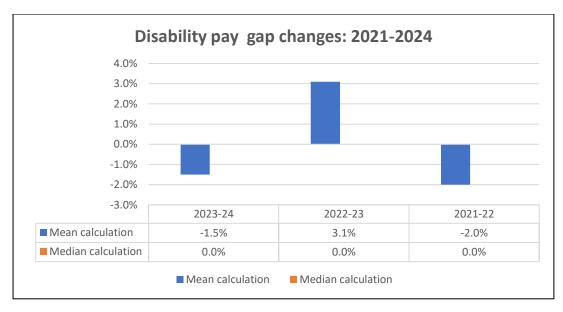


Figure 3: Chart showing pay gap changes for Croydon staff calculated for disabled and non-disabled employees from 2021-24.

5.2 Disability pay quartile representation for all disclosed disabled and non-disabled groups

Figure 4 (below) shows the distribution of disabled employees and non-disabled employees within pay quartiles in 2024 and 2023. This chart does not include any non-disclosed ethnicities.

In 2024, the highest representation of disabled staff is within the lower middle pay quartile (12%) whilst in 2023 this was in the upper middle pay quartile (12%).

The lowest representation of disabled staff in both 2024 and 2023 is in the lowest quartile (10%) and the highest quartile (10%).

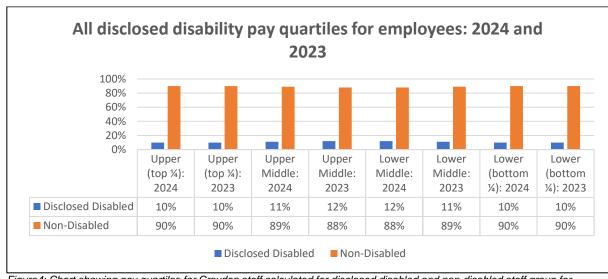


Figure 4: Chart showing pay quartiles for Croydon staff calculated for disclosed disabled and non-disabled staff group for 2023 – 2024

5.3 Disability pay quartile representations for disabled, non-disabled and non-disclosed groups

Figure 5 (below) shows the pay quartiles for disabled, non-disabled and non-disclosed employees for 2023-24.

In both 2023 and 2024, the highest representation of disabled employees was in the upper middle (10%) and lower middle pay quartiles (9%).

There has been an increase in disability representation in the upper pay quartile by 1% from 2023-24.

The lowest representation of disabled employees (in both 2023 and 2024) was in the lowest (bottom 1/4) pay quartile with 6% in both years.

Non-disclosure levels for disability status have reduced in the upper (top $\frac{1}{4}$) and upper middle pay quartiles from 2023-24 by 3%. However non-disclosure has increased by 1% for the lowest (bottom $\frac{1}{4}$) quartile.

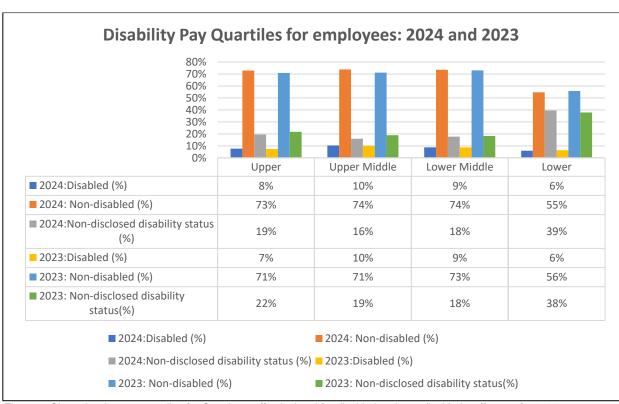


Figure 5: Chart showing pay quartiles for Croydon staff calculated for disabled and non-disabled staff group for 2023 – 2024

5.4 'One-off' payments gap for disability

One-off payments are given to an extremely limited number of employees for specific recruitment and retention purposes (see 2.5).

In line with legislative pay gap reporting regulations, 2023/24 'one-off' payments are known as 'bonus' payments and must be reported alongside hourly pay gap calculations.

In 2023/24, these payments were made to 147 employees in total who comprised:

- 9 (6%) disabled employees
- 86 (59%) non-disabled employees
- 52(35%) undisclosed disability status employees

These employees comprised approximately **4%** of the Croydon council workforce in 2023/24. Given the small employee numbers who received this payment, limited information can be drawn from the figures reported.

'One-off' Payments Gap (% that average one-off payments for declared disabled employees are lower than for declared non-disabled employees)	2024	2023
Disability – 'one-off payments' mean pay gap	25.6%	29.0%
Disability - 'one-off payments' median pay gap	0.0%	0.0%
Disabled staff paid 'one-off payments' as % of all disabled		
staff groups	3.1%	3.2%
Non-disabled staff paid 'one-off payments' as % of all non-disabled staff groups	3.5%	4.6%

Figure 6: Table showing 'one-off' pay gaps calculated via for disabled and non-disabled groups for 2023 - 24

6. Disability pay gap and workforce profile

Figure 7 (below) shows that disability pay quartiles indicate the highest representation of disabled staff are within the lower middle (12%) pay quartile. The representation in this quartile is higher than the workforce profile representation (10%).

Overall, the representation of disabled staff in all pay quartiles is the same or above their workforce representation. The lowest representation of disabled staff is in the lowest paid quartile (10%) and the upper pay quartile (10%).

Disability status (disclosed only)	Upper pay quartile	Upper middle pay quartile	Lower middle pay quartile	Lowest pay quartile	Workforce profile - March 2024
Disabled	10%	11%	12%	10%	10%
Non- disabled	90%	89%	88%	90%	90%

Figure 7: Table showing pay quartiles for disclosed disabled and non-disabled staff within the council compared to the workforce profile as of 31st March 2024

7. Reasons for disability pay gaps in Croydon Council

Levels of disability pay gaps have continued to be low overall for the last three years (2022 -24) in Croydon Council, although the mean pay gap has trended up as well as down.

However, the mean disability pay gap has remained below 2% over the past three years and the median disability pay gap has not risen below 0% in that time.

There are areas of concern to be noted which may potentially cause increases to disability pay gaps in the future including:

- The level of non-disclosed disability status for employees in scope for pay gap reporting (23%) may impact on data produced (although it should be noted that non-disclosure for disability has reduced each year since 2022 and is currently at the lowest level for disability pay gap reporting).
- In 2024, levels of non-disclosure of disability are particularly high in the lowest (bottom 1/4) pay quartile (39%) and this has increased slightly by 1% since 2023.
- We know that employees in the lowest pay quartile may have limited access
 to IT facilities so may find it harder to record equalities data on the council
 systems. However, the council is endeavouring through the Oracle
 Improvement Programme to make reporting of equality data easier and
 encourages staff to report their data in a variety of ways (including via QR
 codes).
- We are also aware that a substantive number of 'casual workers' are also in scope for pay gap recording in March 2024 and as their equalities data is not recorded, this can cause increases to pay gaps and skew representation, particularly in lower pay quartiles.

8. Croydon Council disability pay gaps compared to London Councils

London Councils have produced analysis for pay gaps and pay quartiles by disability as of March 2024. This may provide a useful benchmark regarding the progression of disability pay gaps, but it is worth highlighting that the data from London Councils is based on 17 London boroughs reporting (53% of councils).

	Croydon Council pay gaps - 2024	London Councils pay gaps - 2024
Disability pay gap: mean calculation	0.4%	0.7%
Disability pay gap: median calculation	0.0%	1.1%

Figure 8: Table showing disability pay gaps for Croydon Council and London Councils – 2024

Figure 8 (above) shows that disability pay gaps for Croydon 2024 were lower than the London Council's 2024 average pay gaps calculated as both mean and median figures.

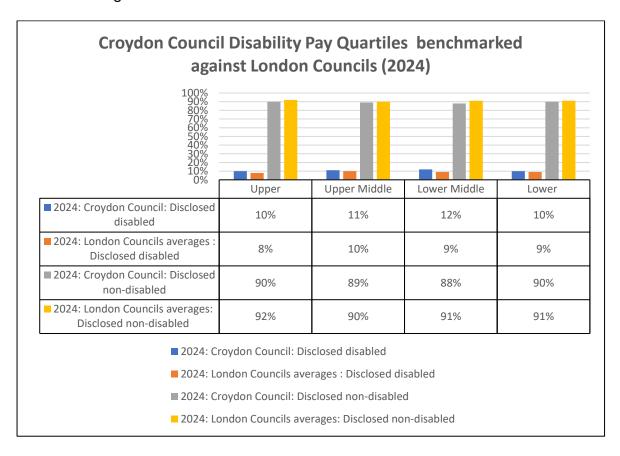


Figure 9: Chart showing Croydon Council's disability pay quartiles representations compared to London Councils' averages: March 2024

This chart in figure 9 (above) shows that in 2024, all Croydon Council disabled employees had higher representations in all the pay quartiles than London Councils average figures.

As can be seen, whilst Croydon council is doing well in disability representation within upper and upper middle pay quartiles, the council is not doing as well in lower middle and lowest pay quartiles because the representation there, is higher than reported against London council averages. However, it should be noted that Croydon had the 5th lowest disability mean pay gap and the joint 5th lowest median disability pay gap out of all London councils who reported.

9. Croydon Council disability pay gaps compared with overall UK disability pay gap

Croydon council calculated its pay gaps using a method set by The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017.

The Office for National Statistics use a different method for calculating the UK wide pay gap and therefore the two are not directly comparable. However, it may still be useful to view the figures below as an indicator (figure 10).

The disability pay gap in Croydon is below the UK average figures.

III Tharacteristic	Croydon Council – median pay gap 2023	UK Average 2024
Disability	0.0%	17.2% <u>(TUC)</u>

Figure 10: Table showing disability pay gap for Croydon Council and UK average as of 2024

10. Keeping disability pay gaps low

Croydon Council is committed to improving equality, diversity, and inclusion within our workforce.

The actions we have taken to improve diversity have had a positive impact on disability pay gap figures since 2020.

It should be noted as positive that:

- Disability mean and median hourly pay gap calculations have remained close to 0% since 2020.
- No pay gap has been reported for the median calculation for four consecutive years (2021-24).
- The representation within pay quartiles for disabled employees is comparable to their workforce representation in 2024 (10%).
- Croydon councils' disability pay gap calculations are lower than London councils' average figures.

- Compared to London councils, Croydon has higher representation of disabled staff in the upper (highest) and upper middle pay quartiles.
- Non-disclosure for disability pay gap reporting overall has decreased from 2022-24 by 4%.

However, on the negative side:

 Non-disclosure of disability (39%) is highest in the lowest paid quartile which may skew figures reported.

Croydon Council also has seen tight financial restrictions in place since 2020. The Future Croydon Strategy (2024-29) will continue to control spending across the council, whilst delivering the Mayor's Business Plan priorities and radically transforming how the council works.

However, the council will continue with its actions to improve disability pay gap differentials.

Current actions to improve pay gaps	Timescale
We have clarified in job advertisements that hybrid working options can be discussed at interview and agreed from the start of employment for all new employees	Ongoing
 We have put in place inclusive recruitment practices including: Anonymized applications Diverse and balanced recruitment panels for all job roles – which we assess by sampling panel compositions to ensure compliance with our recruitment policy. We also intend to publish compliance rates on an on-going basis. Making sure that all interview panellists have minimum training in equality and diversity, unconscious bias and recruitment learning whilst at Croydon. 	Ongoing
We have supported employees to develop staff diversity network groups that support all protected characteristics including disability	Ongoing

•	Mandatory equality and unconscious bias training have been undertaken by all our employees.	Ongoing
•	We will continue to run regular campaigns to reduce non-disclosure rates within the council particularly for ethnicity. Non-disclosure is reducing for most of the council staff, but we acknowledge that there is more work to do regarding engaging with staff with limited access to IT systems in lower pay grades.	Ongoing

- Our <u>Equality Strategy 2023-2027</u> outlines our aim to create a workplace where all employees can be themselves.
- Over the coming years we also aim to implement action to improve pay gap figures:

Upcoming actions to maintain low disability pay gaps	People and Cultural Transformation Strategy (2022 – 2026)	Timescale
Building on work to date, a workforce EDI dashboard will be presented to the EDI internal control board to analyse the workforce profile and to highlight areas where positive action is needed to address underrepresentation.	(Pillar 2) Build an equality driven, diverse and inclusive workplace.	2023 - 2026
The council will develop an inclusive and distributed leadership tool which aims to improve inclusion across the council, improving employees' lived experience. This initiative also enables Pillar one, strengthening the council's leadership capability.	(Pillar 2) Build an equality driven, diverse and inclusive workplace.	2023 - 2026

We will develop clear career and skills development pathways to ensure a systemic and holistic approach to workforce development which will be aligned to business planning and the fulfilment of the Mayor's Business Plan to optimise performance for residents' benefit.	(Pillar 4) Build our skills and capabilities and optimise our performance.	2023 - 2026
The council will invest in positive action development programmes for protected characteristic staff to ensure an equitable approach to address current and past organisational shortcomings.	(Pillar 4) Build our skills and capabilities and optimise our performance.	
We will develop a range of different resourcing methods to seek to attract diverse and high-quality candidates to work for the council. As covered under Pillar 4, we aim to redevelop our recruitment landing pages to provide and authentic brand and compelling package to attract the best candidates possible. We will also implement a values-based approach to recruitment to ensure candidates are assessed on their behavioural values, as well as knowledge, skills, education, and aptitude. We need to be mindful around supporting reasonable adjustments for disabled candidates/employees and showing visual representation of this population in our workforce.	(Pillar 5) Acquire and retain talent, responding to skills gaps in the context of a more competitive recruitment market.	2023 - 2026

Appendix 1: Disability Pay Gap Data Sets as reported for March 2024

The tables below show the reported data sets.

HOURLY RATE

CATEGEOF	RY	MEAN DISA GAP	BILITY PAY	MEDIAN PAY GAP	DISABILITY
Disabled pay rate is:	hourly	0.4% lower disabled	than non-	0.0% (no ga	p)

PAY QUARTILES:

QUARTILE	NON-DISABLED	DISABLED	NON-
			DISCLOSED
Upper	73%	8%	19%
Upper Middle	74%	10%	16%
Lower Middle	74%	9%	17%
Lower	55%	6%	39%

QUARTILE	DISCLOSED NON- DISABLED	DISCLOSED DISABLED
Upper	10%	90%
Upper Middle	11%	89%
Lower Middle	12%	88%
Lower	10%	90%

ONE-OFF PAYMENTS/'BONUS'

CATEGORY	MEAN	MEDIAN
Disabled employees 'one-	25.6%	0.0%
off payments' are:		

CATEGORY	DISABLED GROUPS	NON-DISABLED GROUPS
Who received 'on payments?	e-off 3.1% (of disabled staff)	3.5% (of non-disabled staff)

Appendix 2: Allowances included in disability pay gap calculations

The following allowances are included in calculations for the ethnicity and disability pay gaps:

- market supplements
- acting-up payments
- weekend and night working
- standby payments

Croydon Council Disability Pay Gap report – March 2024