

Croydon Council Disability Pay Gap Report

Based on data collected from 2021 – 2022

Issued: June 2023

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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 2022) calculated as a mean figure was -1.2%. The council's disability pay gap calculated as a median figure was 0.0%. In 2021, the disability pay gap as a mean calculation was 0.8% and as a median

Disability pay gap	2022 (data as of 31st March)	2021 (data as of 31st March)
Mean ordinary hourly pay gap	-1.2%	0.8%
Median ordinary hourly pay gap	0.0%	0.0%

calculation was 0.0%

This means that the disability pay gap as a mean calculation, has reduced by 2.0% from 2021 – 22 whilst the median pay gap has remained at 0.0%.

Changes in disability pay gaps	2020 - 21	2021 - 22
Mean	+1.8%	-2.0%
Median	+0.4%	No change (0.0%)

In 2022 disabled staff are being paid a higher average hourly rate than non-disabled staff as mean pay rate calculation, and that there is no pay gap between disabled and non-disabled staff as a median pay rate calculation.

The representation of disabled and non-disabled employees within the upper (top ¼), upper middle and lower middle pay quartiles also largely shows similarity with the workforce representations in both 2021 and 2022.

Croydon Council Disability Pay Gap report: 2021-2022

Quartile	Disabled	Non-Disabled	Non-Disclosed
Upper (top ¼)	8%	68%	25%
Upper Middle	8%	72%	19%
Lower Middle	8%	73%	18%
Lower (bottom ¼)	5%	51%	44%

Croydon council's disability pay gaps are lower than the average UK disability pay gap of 13.8% (ONS 2021) and London Councils (all boroughs) pay gap averages (1.2% mean; 1.2% median) for 2021.

The non-disclosure rate for employees in scope for disability pay gap reporting has decreased by 5% overall from 2021-22.

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 People and Cultural Transformation Strategy 2022 – 2026, especially Pillar 2, workforce EDI.

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

Sex:

	Female	Male
Croydon Council – all workforce (2021/2)	68%	32%
Croydon Residents: ONS Census 2021, November 2022	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) (2021/2)	8%	30%	6%	4%	52%
Croydon Residents: ONS census 2021	17%	23%	8%	4%	48%

Disability:

Croydon Council: all workforce disclosed disability 2021/2 (%)	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 2022 (and 2021) will include 'casual' workers for whom no disability status data is held.

The level of non-disclosure for disability 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 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 3,506 people in the scope as eligible for reporting on 31st March 2022.

As of 31st March 2022, the percentages for declared disability status within the council's workforce profile were:

- 7% Disabled
- 66% non-disabled
- 26% non-disclosed disability status

Figure 1 (below) shows the non-disclosure rates for disability for the pay gap reporting as of 31st March 2022 compared to 2021.

	31 st March 2022	31 st March 2021
Non-disclosure rate – disability pay gap reporting	27%	32%

Figure1: Table showing non-disclosure rates for disability pay gap reported staff as of 31st March 2021 and 2022.

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 2020 – 2022.

All disability mean and median pay gap figures were low in the 2020 – 22 period with both numbers either slightly above or below 0%.

(% that average pay for declared disabled employees is higher or lower than for declared non-disabled employees)	2020 (data as of 31st March)	2021 (data as of 31st March)	2022 (data as of 31st March)
Mean ordinary hourly pay gap	-1.0%	0.8%	-1.2%
Median ordinary hourly pay gap	-0.4%	0.0%	0.0%

Figure 2: Table showing mean and median ordinary hourly pay gaps for Croydon staff calculated for disabled and non-disabled employees from 2020 -2022.

Figure 3 (below) shows the disability pay gaps for 2020-21 had increased by 1.8% (mean) and 0.4% (median). However, in 2021-2 the mean pay gap has decreased by 2.0% and the median pay gap has remained at 0.0% for a second consecutive year.

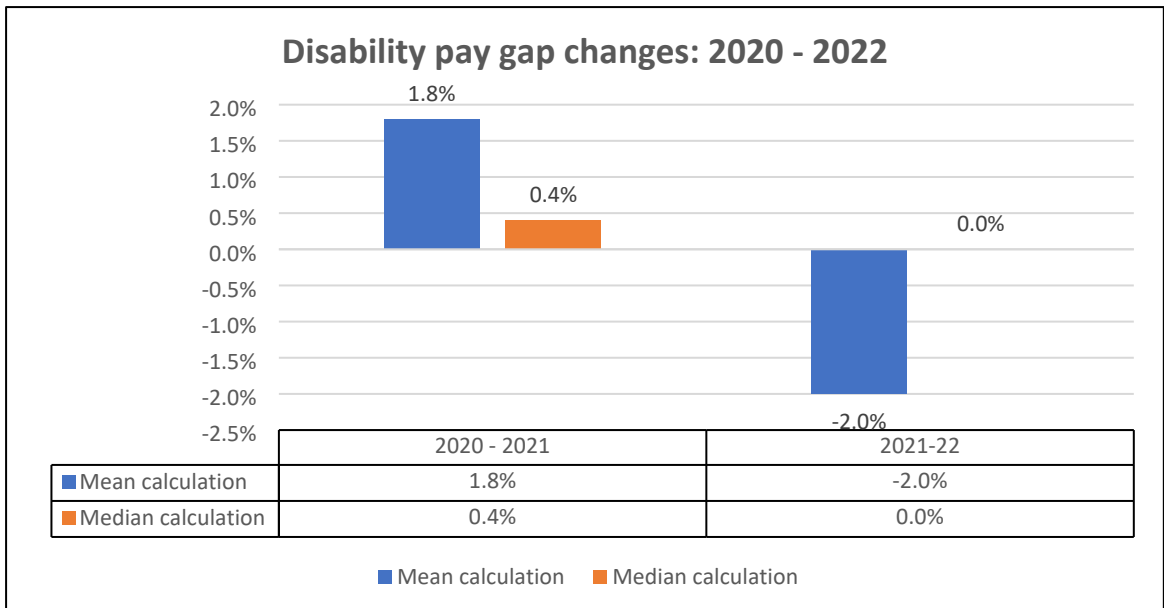


Figure 3: Chart showing pay gap changes for Croydon staff calculated for disabled and non-disabled employees from 2020 -2022.

5.2 Disability pay gap: quartile analysis

Figure 4 (below) shows the pay quartiles for disclosed disabled, disclosed non-disabled and non-disclosed employees for 2021 – 2022.

In 2022, the highest representation of disabled employees are in the upper (top ¼), upper middle, and lower middle pay quartiles (8%) whilst the highest proportion of non-disabled employees are in the lower middle pay quartile (73%).

The lowest representation of disabled employees (in 2022 and 2021) are in the lowest (bottom ¼) pay quartile (5%) whilst the lowest level of non-disabled employees are also in the lowest pay quartile (51% in 2022 and 46% in 2021).

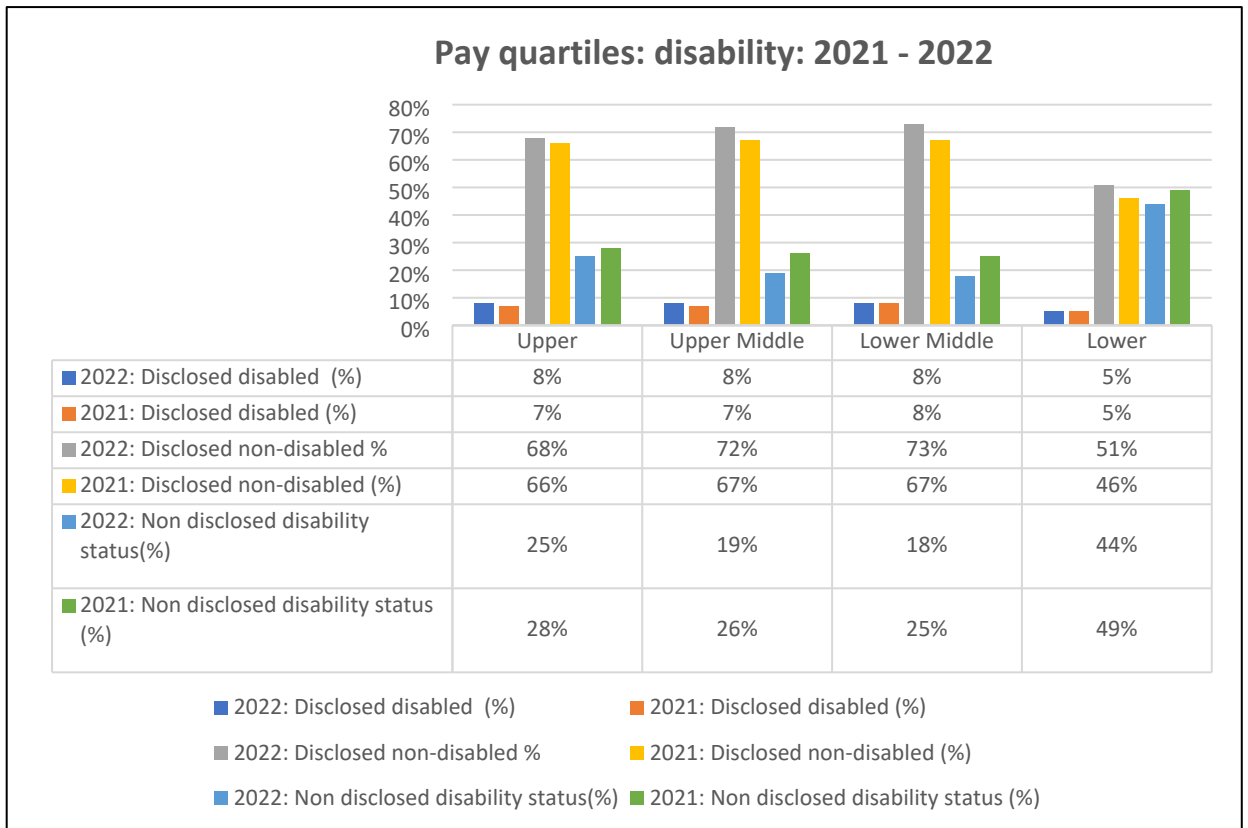


Figure 4: Chart showing pay quartiles for Croydon staff calculated for disabled and non-disabled staff group for 2021 – 2022

5.3 ‘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). Figure 5 (below) shows the figures for pay gaps between disabled and non-disabled employees during 2020/21 and 2021/22.

These payments were made during the 2020/21 year to 195 employees in total who comprise of:

- 8 (4%) disabled employees
- 87 (45%) non-disabled employees
- 100 (51%) undisclosed disability status employees

During the 2021/22 year, these payments were made to 174 employees in total who comprised of:

- 4 (2%) disabled employees
- 36 (21%) non-disabled employees
- 134 (77%) undisclosed disability status employees

These employees comprised 5% of the Croydon council workforce. 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)	2021	2022
Disability – 'one-off payments' mean pay gap	5.3%	17.7%
Disability - 'one-off payments' median pay gap	0.0%	0.0%
Disabled staff paid 'one-off payments' as % of all disabled staff groups	3.2%	3.1%
Non-disabled staff paid 'one-off payments' as % of all non-disabled staff groups	3.9%	3.4%

Figure 5: Table showing 'one-off' pay gaps calculated via for disabled and non-disabled groups for 2021 - 2022

6. Disability Pay Gap and Workforce Profile

Figure 6 (below) shows that disability pay quartiles indicate the highest representation of disabled staff are within the upper, upper middle and lower middle pay quartiles (8%) – this is higher than the workforce profile representation (7%). Overall, the representation of disabled staff in the top three pay quartiles is higher than their workforce representation. The lowest representation of disabled staff in in the lowest paid quartile (5%) but given the high levels of non-disclosure (44%) in this quartile it is possible that this figure is not reliable.

Disclosed non-disabled employees represent 66% of staff within the workforce profile. Their representation is also higher than their workforce profile in the top three pay quartiles.

	Upper pay quartile	Upper middle pay quartile	Lower middle pay quartile	Lowest pay quartile	Workforce profile - March 2022
Disabled	8%	8%	8%	5%	7%
Non-disabled	68%	72%	73%	51%	66%
Not disclosed	25%	19%	18%	44%	26%

Figure 6: Table showing pay quartiles for disabled and non-disabled staff within the council as of 31st March 2022

7. Reasons for disability pay gaps in Croydon Council

Levels of disability pay gaps have continued to be low for the last three years in Croydon Council and in 2022 show a higher average hourly rate for disabled staff than non-disabled as a mean calculation, and no pay gap as a median calculation.

However, there are areas of concern to be noted, which may potentially cause increases to pay gaps including:

- The level of non-disclosed disability status for employees in scope for pay gap reporting (27%) may impact on data produced.
- Levels of non-disclosure of disability are particularly high in the lowest pay quartile and this has only decreased by 5% from 2021-22. We know that employees in this quartile may have limited access to IT facilities so may find it harder to record equalities information.

8. Croydon Council disability pay gaps compared to London Councils

London Councils have produced analysis (2021) for pay gaps and pay quartiles by disability. 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 14 London boroughs reporting (out of 32) so there are limited conclusions to draw. No data from London Councils has yet been produced for 2022 disability pay gaps.

	Croydon Council pay gaps - 2021	London Councils pay gaps - 2021	Croydon Council pay gaps - 2022
Disability pay gap: mean calculation	0.8%	1.2%	-1.2%
Disability pay gap: median calculation	0.0%	1.2%	0.0%

Figure 7: Table showing disability pay gaps for Croydon Council and London Councils – 2021-22

Figure 7 (above) shows that disability pay gaps for Croydon in 2021 and 2022 were lower than the London Council's 2021 pay gaps.

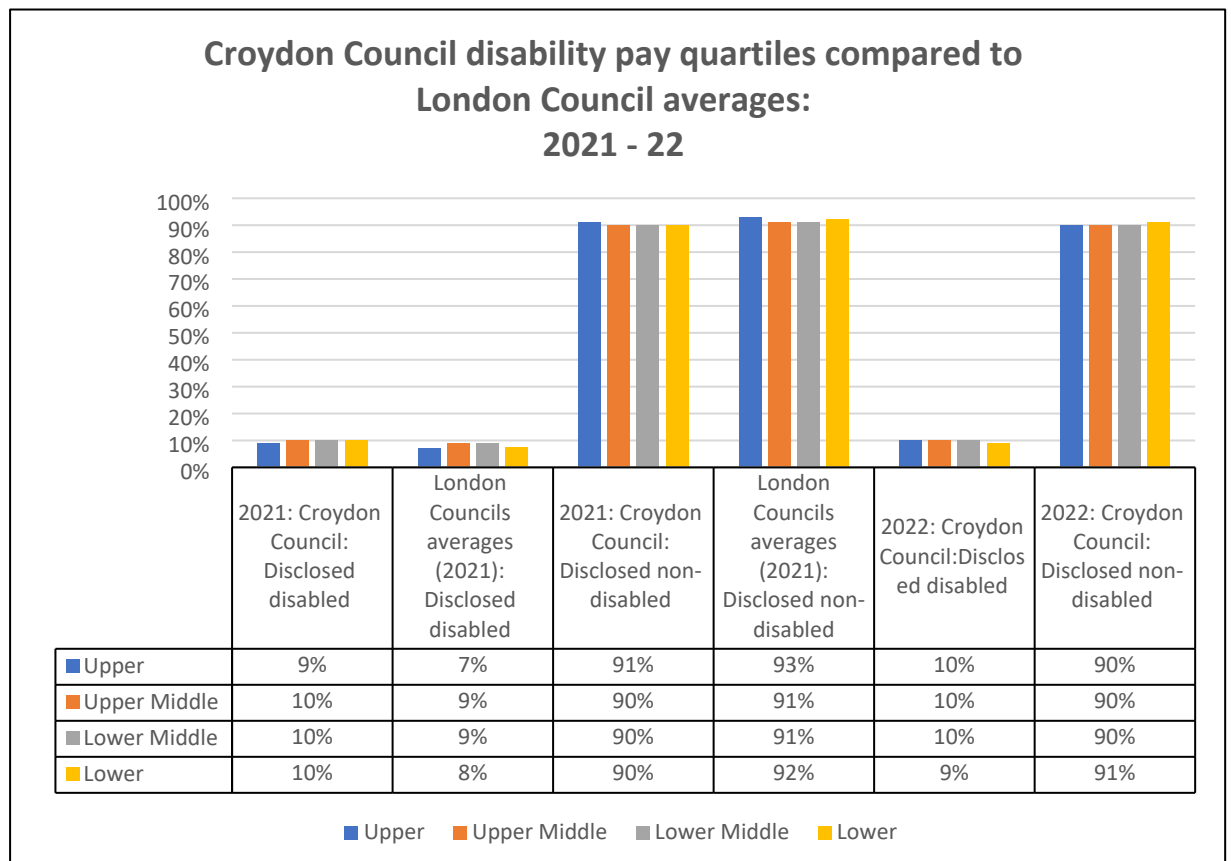


Figure 8: Chart showing Croydon Council's disability pay gap compared to London Councils averages: 2021-22

This chart in figure 8 (above) shows that in 2021 and 2022 all Croydon Council disabled employees had higher representations in all pay quartiles than London Councils averages in 2021.

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 9).

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

Characteristic	Croydon Council median pay gap 2021	–UK Average 2021
Disability	0.0%	13.8% (ONS)

Figure 9: Table showing disability pay gap for Croydon Council and UK average as of 2021

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 a 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 two consecutive years (2021 & 22).
- In 2022, the mean average pay rate for disabled employees exceeds non-disabled pay rates.
- The representation within pay quartiles for disabled employees is comparable to their workforce representation in 2022 and 2021.
- Non-disclosure for pay gap reporting overall has decreased from 2021-22 by 5%
- Disability mean and median pay gaps in 2021 were lower than London Councils figures for the same year.

However, on the negative side:

- Non-disclosure of disability (over 40%) 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 Croydon Renewal Plan for the next two years will continue to control spending across the council. However, the council will continue with its actions to improve disability pay gap differentials.

Current actions to improve pay gaps	Timescale
<ul style="list-style-type: none"> • 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
<ul style="list-style-type: none"> • We have put in place inclusive recruitment practices including: <ul style="list-style-type: none"> ○ 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
<ul style="list-style-type: none"> • We have supported employees to develop staff diversity network groups that support all protected characteristics including disability 	Ongoing
<ul style="list-style-type: none"> • Mandatory equality and unconscious bias training have been undertaken by all our employees. 	Ongoing
<ul style="list-style-type: none"> • 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 	Ongoing

there is more work to do regarding engaging with staff with limited access to IT systems in lower pay grades.	
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- Our [commitment to equality](#) 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

<p>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.</p>	<p>(Pillar 4) Build our skills and capabilities and optimise our performance.</p>	<p>2023 - 2026</p>
<p>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 an 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.</p> <p>We need to be mindful around supporting reasonable adjustments for disabled candidates/employees, and showing visual representation of this population in our workforce.</p>	<p>(Pillar 5) Acquire and retain talent, responding to skills gaps in the context of a more competitive recruitment market.</p>	<p>2023 - 2026</p>

Appendix 1: Reporting Data Sets as reported for March 2021 and March 2022

The tables below show the reported data sets.

HOURLY RATE

CATEGEORY	2022: MEAN DISABILITY PAY GAP	2022: MEDIAN DISABILITY PAY GAP	2021: MEAN DISABILITY PAY GAP	2021: MEDIAN DISABILITY PAY GAP
Disabled hourly pay rate is:	1.2% higher than non-disabled	0.0% (no gap)	0.8% lower than non-disabled	0.0% (no gap)

PAY QUANTILES: 2022

QUARTILE	NON-DISABLED	DISABLED	NON-DISCLOSED
Upper	68%	8%	25%
Upper Middle	72%	8%	19%
Lower Middle	73%	8%	18%
Lower	51%	5%	44%

PAY QUANTILES: 2021

QUARTILE	NON-DISABLED	DISABLED	NON-DISCLOSED
Upper	66%	7%	28%
Upper Middle	67%	7%	26%
Lower Middle	67%	8%	25%
Lower	46%	5%	49%

ONE-OFF PAYMENTS

CATEGORY	2022: MEAN	2022: MEDIAN
Disabled employees 'one-off payments' are:	17.7%	0.0%

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CATEGORY	2021: MEAN	2021: MEDIAN
Disabled employees 'one-off payments' are:	5.3%	0.0%

CATEGORY	2022: DISABLED GROUPS	2022: NON-DISABLED GROUPS
Who received 'one-off payments?	3.1% (of disabled staff)	3.4% (of non-disabled staff)

CATEGORY	2021: DISABLED GROUPS	2021: NON-DISABLED GROUPS
Who received 'one-off payments?	3.2% (of disabled staff)	3.9% (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

