

Gender, Ethnicity, and Disability Pay Gap Report

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Author: Lisa Wilks, Director of HR; Lily Rogers, HR Analyst & Adviser; Chris Northover, Payroll Supervisor;

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Gender, Ethnicity, and Disability Pay Gap Report

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1. Introduction

University College of Estate Management (UCEM) is a long-standing and leading provider of supported online education. UCEM exists to provide accessible, relevant, and cost-effective education which enhances careers, increases professionalism and contributes to a sustainable built environment. Operating from the UK and Hong Kong, UCEM has a global reach, with over 3,500 students studying at any one time.

In accordance with the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017, UCEM is required to carry out gender pay gap reporting. It is important to highlight that gender pay gap differs from equal pay. Equal pay deals with the pay differences between men and women who carry out the same jobs, similar jobs, or work of equal value. Gender pay gap shows the differences in the average pay between men and women and is calculated as the difference between the average hourly earnings of men and women, as a proportion of average hourly earnings of men's earnings. This report focuses on gender pay gap only, however UCEM supports equal pay for men and women at work. Within this report we publish the six **gender pay gap** calculations required under the Regulations:

1. Gender pay gap as a *mean average*
2. Gender pay gap as a *median average*
3. Bonus gender pay gap as a *mean average*
4. Bonus gender pay gap as a *median average*
5. Proportion of men receiving a bonus payment and proportion of women receiving a bonus payment
6. Proportion of men and women when divided into four groups ordered from lowest to highest pay.

Despite it not being a mandatory requirement, over the last couple of years we have also undertaken an ethnicity pay gap analysis (in our first year we only reported the mean and median average). Ethnicity pay gap shows the differences in the average pay between white and ethnic minority staff and is calculated as the difference between the average hourly earnings of white and ethnic minority staff, as a proportion of average hourly earnings of white staff's earnings. A positive percentage means the average hourly pay rate of white staff is higher than those from other ethnic minority groups combined. Please note, the ethnicity pay gap is different to equal pay. Within this report we voluntarily publish six **ethnicity pay gap** calculations:

1. Ethnicity pay gap as a *mean average*
2. Ethnicity pay gap as a *median average*
3. Bonus ethnicity pay gap as a *mean average*
4. Bonus ethnicity pay gap as a *median average*
5. Proportion of white staff receiving a bonus payment and proportion of ethnic minority staff receiving a bonus payment
6. Proportion of white staff and ethnic minority staff when divided into four groups ordered from lowest to highest pay.

For the first time, we have also decided this year to voluntarily undertake a disability pay gap analysis. The definition of disability considered as part of this includes that which is defined under [the Government consultation for disability workforce reporting](#) (also consistent with HESA for regulatory

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returns). This includes those with an impairment, health condition or learning difference. Disability pay gap shows the differences in the average pay between staff with no known disability and with a known disability and is calculated as the difference between the average hourly earnings of those with no known disability and those with a known disability, as a proportion of average hourly earnings of staff with no known disability. A positive percentage means the average hourly pay rate of staff with no known disability is higher than those from staff with a known disability. Please note, the disability pay gap is different to equal pay. Within this report we voluntarily publish six **disability pay gap** calculations:

1. Disability pay gap as a *mean average*
2. Disability pay gap as a *median average*
3. Bonus disability pay gap as a *mean average*
4. Bonus disability pay gap as a *median average*
5. Proportion of no known disability staff receiving a bonus payment and proportion of known disability staff receiving a bonus payment
6. Proportion of no known disability staff and known disability staff when divided into four groups ordered from lowest to highest pay.

In addition to presenting all three sets of calculations described above, **observations** are made about business activities during the reporting year, which we consider are responsible for driving the outcomes of the calculations.

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1.1 Declaration



I confirm that our data has been calculated according to the requirements of the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

A handwritten signature in black ink, appearing to read 'Ashley Wheaton'.

Ashley Wheaton, Principal



I confirm that our data has been calculated according to the requirements of the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

A handwritten signature in black ink, appearing to read 'Amanda Clack'.

Amanda Clack, Chair, UCEM Board of Trustees

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2. Gender pay gap

2.1 Gender pay data

We collected our data on 5 April 2024, when our workforce consisted of 220 women and 148 men; this is a total workforce of 368 (59.8% women and 40.2% men). This was the same percentage as the previous year where our total workforce was 361, consisting of 216 women (59.8%) and 145 men (40.2%).

The mean gender pay gap is the difference between the average hourly earnings of men and women. The figures show that UCEM has a **mean gender pay gap of 12.3%**. The average hourly pay rate for men is £24.14 and women £21.17, which is a difference of £2.97 per hour.

The median gender pay gap is the difference between the midpoints in the ranges of average hourly earnings of men and women. The figures show that UCEM has a **median gender pay gap of 14.7%**. The midpoint for men is £22.18 and women £18.90, which is a difference of £3.29 per hour.

The mean pay gap has seen an improvement from the previous year (13.3%) and is the same as the mean observed in 2021. However, the median pay gap has widened quite significantly, with the median pay gap last year standing at 8.2% (increase of 6.5%).

In terms of the quartile populations, in the lower quartiles:

- In the **lower quartile** there were 72 women and 20 men (69 women and 22 men previously).
- In the **lower middle quartile** there were 69 women and 23 men (66 women and 24 men previously).
- In these lower quartiles 76.6% of our staff group were women, compared to 74.6% the previous year. This is an increase of women by 2%.

In the upper quartiles:

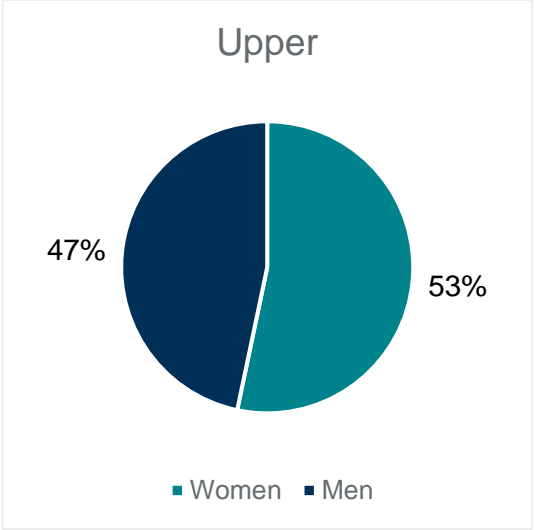
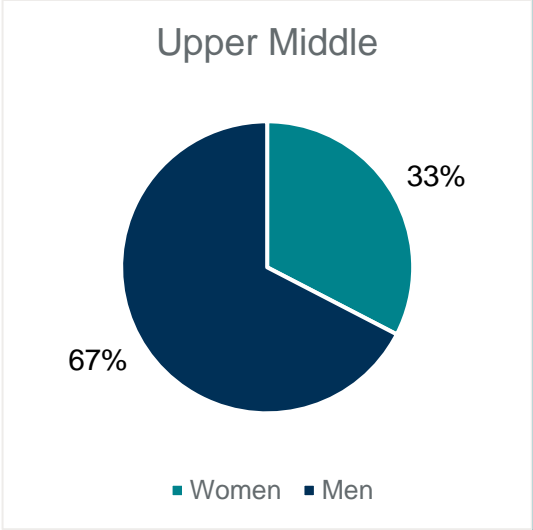
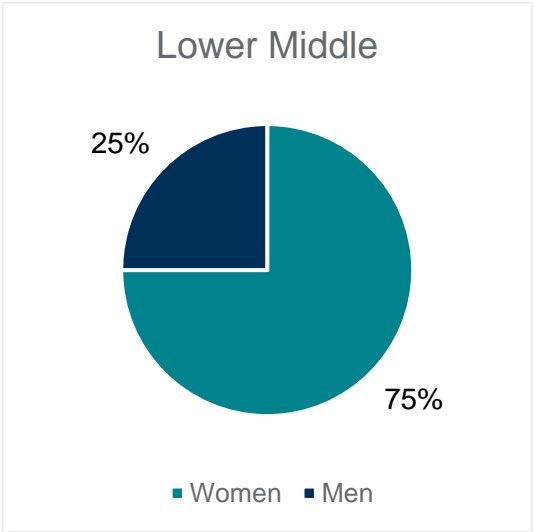
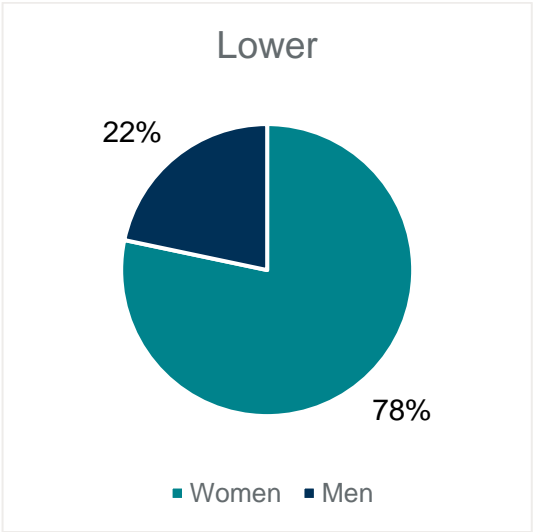
- In **upper middle quartile** there were 30 women and 62 men (33 women and 57 men previously).
- In the **upper quartile** there were 49 women and 43 men (48 women and 42 men previously).
- In these upper quartiles, 42.9% of our staff group were women, compared to 45% the previous year. This is a decrease of women by 2.1%.

Summary of the key reporting data:

	Women's earnings are:	Previous year 2023
Mean gender pay gap in hourly pay	12.3% lower	13.3% lower
Median gender pay gap in hourly pay	14.7% lower	8.2% lower

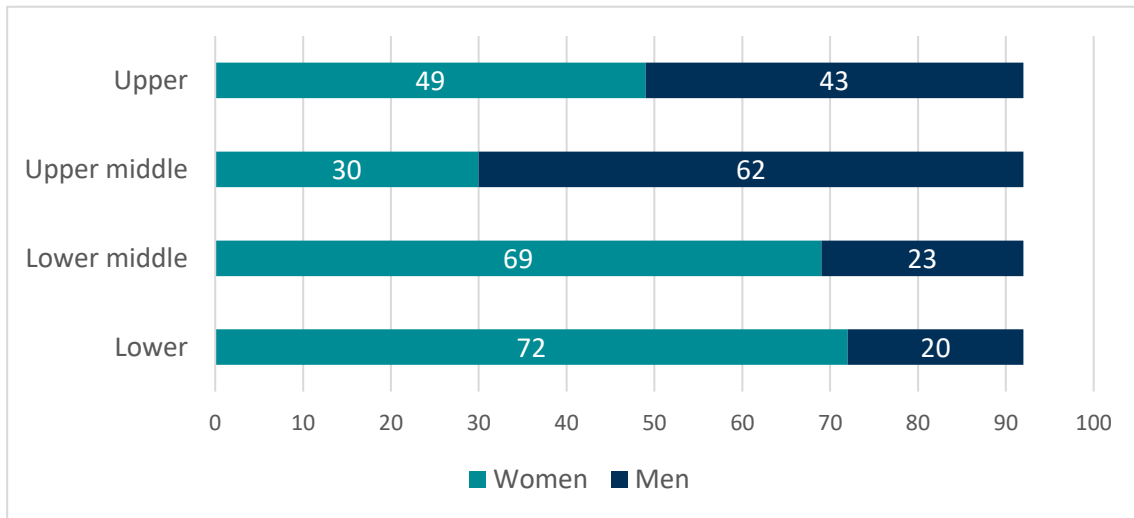
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Proportion of women and men in each pay quartile:



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Number of women and men in each pay quartile:



Total workforce:

Year	Women	Men	Total	Total change
2024	220	148	368	1.9% increase
2023	216	145	361	2.6% increase
2022	210	142	352	2.5% decrease
2021	204	157	361	0.6% decrease
2020	201	162	363	4.6% increase
2019	192	155	347	3.4% decrease
2018	186	173	359	19.7% increase
2017	150	150	300	n/a – first reporting year

2.2 Observations about gender pay gap

This year there has been a small population increase in both men and women compared to the previous year, with a marginally higher percentile increase seen in the population of men (2.1% increase) compared to the population of women (1.9% increase). This might explain why the mean pay gap has stayed relatively stable, with only a slight decrease of 1%. The distribution of these increases however may better explain the 6.5% increase to the median gap, as this varies across quartiles.

The increasing number of women and decreasing number of men in the lower quartiles continues to concern us with the trend persisting this year. UCEM openly advertises job roles across a number of

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recruitment channels and receives applications from both males and females, but not necessarily in equal measure. There is also a more significant decrease in the number of women than men in the Associate Lecturer population group this year, with the decrease in men observed as 5.7% and women 21.6%. This is also reflected in the quartile changes where we have seen the increase in men in the upper middle quartile.

Whilst there is an increase in the count of women in the upper quartile, this gain is very small and is outweighed by the population changes already observed above, whereby we are seeing a decrease in women and increase in men within the upper middle quartile, then contrastingly the increase in women and decrease in men in the lower quartiles. These population changes are the likely contributors for the more significant increase in the overall median pay gap compared to the previous year.

Despite this, it is important to note that we operate a thorough and fair recruitment process for every job vacancy, and selection decisions are based solely on the most suitable candidate for the vacancy against the person specification.

Other factors contributing to the gap which have been in existence in previous reporting years, include the following:

- Due to the higher population of women overall and the fact the main pension scheme operated by UCEM is on a default salary sacrifice basis, more women than men are sacrificing salary. This reduces the hourly pay rate of women overall, for the purposes of calculating the gender pay gap.
- The upper middle quartile is made up almost entirely of our Associate Lecturer staff, with a few appearing in other quartiles particularly where they have increased salary sacrifice contributions for their pension. Whilst the hourly pay rate of these workers is uniform, there are consistently more men than women in this staff group which is always a contributing factor (66 men compared to 29 women). This group has seen a consistent decrease in population size for at least the last three reporting years and, due to more work now being undertaken by the core internal academic team, is likely to be a continuing trend.

In terms of maintaining a fair and equitable pay system, UCEM continues to have an effective pay benchmarking process in place. UCEM participates in two sector-specific salary surveys each year and uses the published results to help inform pay review and recruitment. This makes sure pay rates between men and women are monitored closely and pay is aligned to the job role only, which also helps to reduce any pay gaps which may exist.

2.3 Gender bonus data

In the reporting year 2023-24, 228 employees (62%) received a bonus; 162 were women (71.1%) and 66 were men (28.9%). All bonuses paid were based on performance, with the majority being discretionary and others based on the contract of employment. The 38% not in receipt of any bonus mostly fall within the Associate Lecturer staff group, where a bonus does not form part of their contract of employment (discretionary or otherwise).

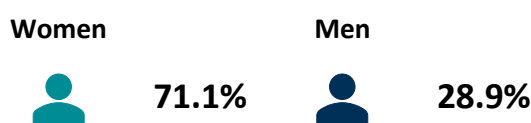
For those bonuses paid, the **mean bonus gender pay gap was 39.4%** and the **median bonus gender pay gap was 23.1%**.

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Summary of the key reporting data:

	Women's bonuses are:	Previous year 2023
Difference in mean bonus payments	39.4% lower	32% lower
Difference in median bonus payments	23.1% lower	11.7% higher

Proportion of women and men receiving a bonus payment:



2.4 Observations about gender bonus gap

Within this reporting year, the majority of bonus payments were discretionary and of a fixed amount (pro-rated for part-time staff) and awarded based on individual performance against criteria defined in the formal Performance and Development Review (PDR) process.

Overall, more women across all levels received a bonus in the reporting year compared to men in consideration of the total pay gap population. As already stated above, this is largely due to our Associate Lecturer staff group not being eligible for bonus payments. As we know, this group is more heavily populated by men than women, therefore their removal from the bonus pay gap means the population of women is even larger (at 71.1% compared to 59.8%) and therefore has an adverse effect on the mean and median bonus.

As is common in each reporting year, the bonuses awarded to executive employees in the upper pay quartile greatly contributes to the larger mean gender bonus gap. Whilst bonuses here are also discretionary, they tend to be higher amounts than seen elsewhere within the staff group. In addition, and by way of illustration, the gendered identity of the staff member in receipt of the highest bonus is male; if the gendered identity were changed the overall mean bonus gap would decrease to 8.1%.

2.5 Benchmarking (pay and bonus)

Whilst ONS results are estimates and therefore provisional, we acknowledge that our median gender pay gap at 14.7% falls above the 2024 median national average* which currently sits at 13.1%.

*Office for National Statistics (ONS), released 29 October 2024, ONS website, statistical bulletin, [Gender pay gap in the UK: 2024](#)

When looking to higher education pay gap benchmarks for comparison, the Universities and Colleges Employers Association (UCEA) (2024, January) published an Intersectional Pay Gap in Higher Education report, which showed a median pay gap of 12.3% and mean of 14.8% for the year 2021-22. It also showed a bonus gap of 7.6% median and 21.4% mean. Whilst it is tempting to consider these benchmarks, we remain mindful that not only is the data almost two years old, but also the methodology adopted by UCEA for the calculations differs from the statutory calculation. Data is also based on 110 Higher Education Institutions (HEIs) and the report itself acknowledges bonuses are

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especially rare in HEI's, showing in only 12% of their reported populations; therefore, this does not make for an appropriate comparison.

3. Ethnicity pay gap

3.1 Ethnicity pay data

We collected our data on 5 April 2024, when our workforce consisted of 62 ethnic minority staff, 293 white staff, and 13 staff who responded to our EDI data collection questionnaire by choosing the prefer not to say option or did not respond at all; this is a total workforce of 368 (16.8% ethnic minority, 79.6% white, 3.5% prefer not to say). This was a slight change from the previous year when our total workforce was 361, consisting of 59 ethnic minority staff (16.3%), 280 white staff (77.6%), and 22 prefer not to say (6.1%).

The mean ethnicity pay gap is the difference between the average hourly earnings of white and ethnic minority staff. The figures show that UCEM has a **mean ethnicity pay gap of 6.1%**. The average hourly pay rate for white staff is £22.58 and for ethnic minority staff is £21.20, which is a difference of £1.38 per hour.

The median ethnicity pay gap is the difference between the midpoints in the ranges of average hourly earnings of white and ethnic minority staff. The figures show that UCEM has a **median ethnicity pay gap of -3.7%**. The midpoint for white staff is £21.38 and ethnic minority staff is £22.18, which is a negative difference of 80p. This midpoint is driven by the fact a number of staff within the workforce (within the pay quartiles) hold the job role of Associate Lecturer, who not only have a fixed rate of pay, but are also more diverse ethnically as a population.

The mean shows an improved position on the prior reporting year and more similar to that reported in 2022 (6%), whereas the median has decreased to the point of a negative difference.

In terms of the quartile populations, in the lower quartiles:

- In the **lower quartile** there were 14 ethnic minority staff, 75 white staff, and 3 prefer not to say staff (15 ethnic minority, 68 white, and 8 prefer not to say staff previously).
- In the **lower middle quartile** there were 14 ethnic minority staff, 76 white staff, and 2 prefer not to say staff (15 ethnic minority, 68 white, and 7 prefer not to say staff previously).
- In these lower quartiles, 15.2% of our staff group were ethnic minority staff, compared to 16.6% the previous year. This is a decrease of ethnic minority staff by 1.4%.

In the upper quartiles:

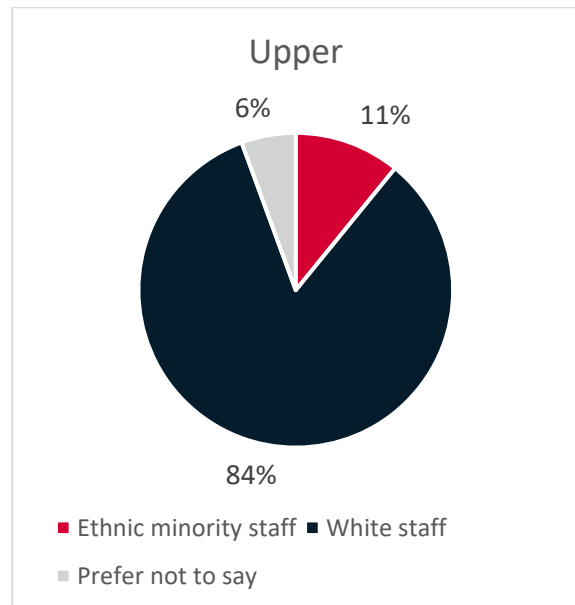
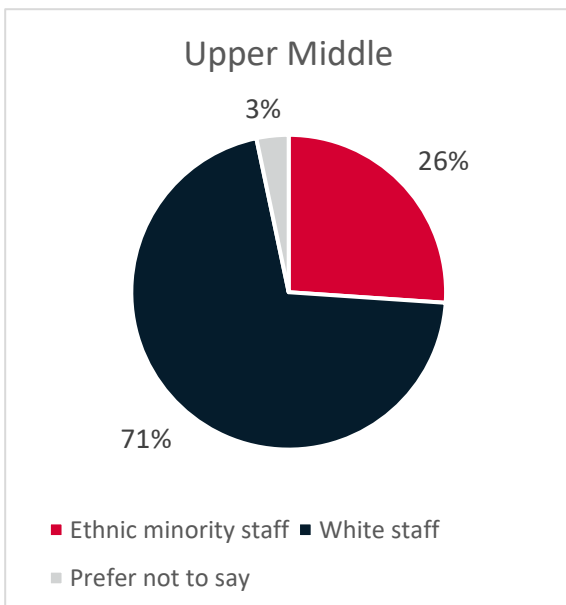
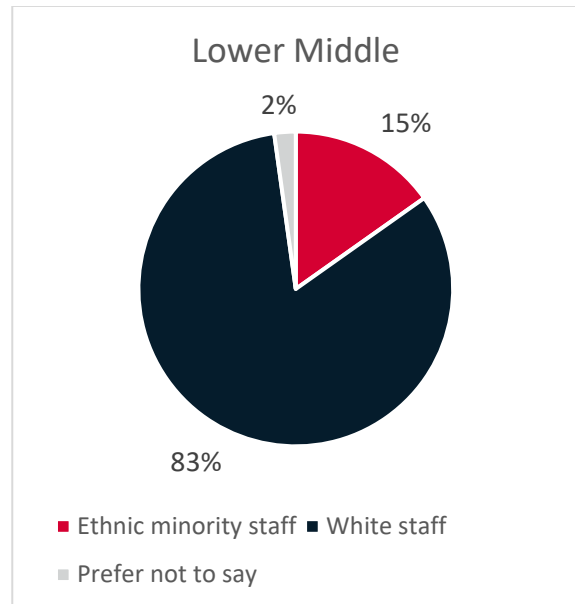
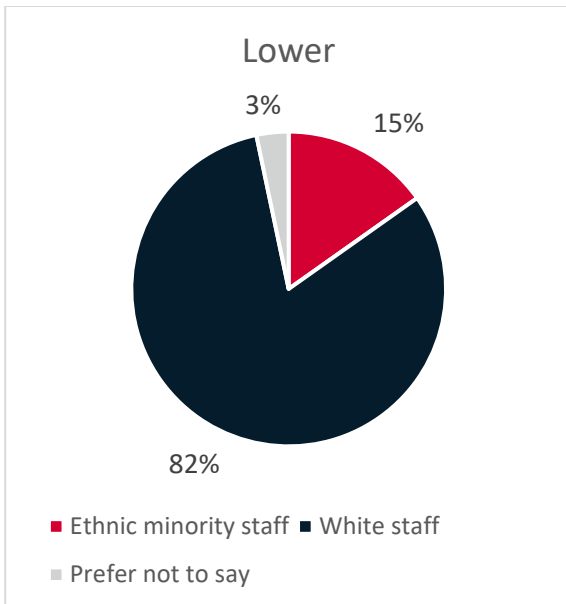
- In **upper middle quartile**, there were 24 ethnic minority staff, 65 white staff, and 3 prefer not to say staff (19 ethnic minority, 69 white, and 2 prefer not to say staff previously).
- In the **upper quartile**, there were 10 ethnic minority staff, 77 white staff, and 5 prefer not to say staff (10 ethnic minority, 75 white, and 5 prefer not to say staff previously).
- In these upper quartiles, 18.5% of our employee group were ethnic minority staff, compared to 16.1% the previous year. This is an increase of ethnic minority staff by 2.4%.

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Summary of the key reporting data:

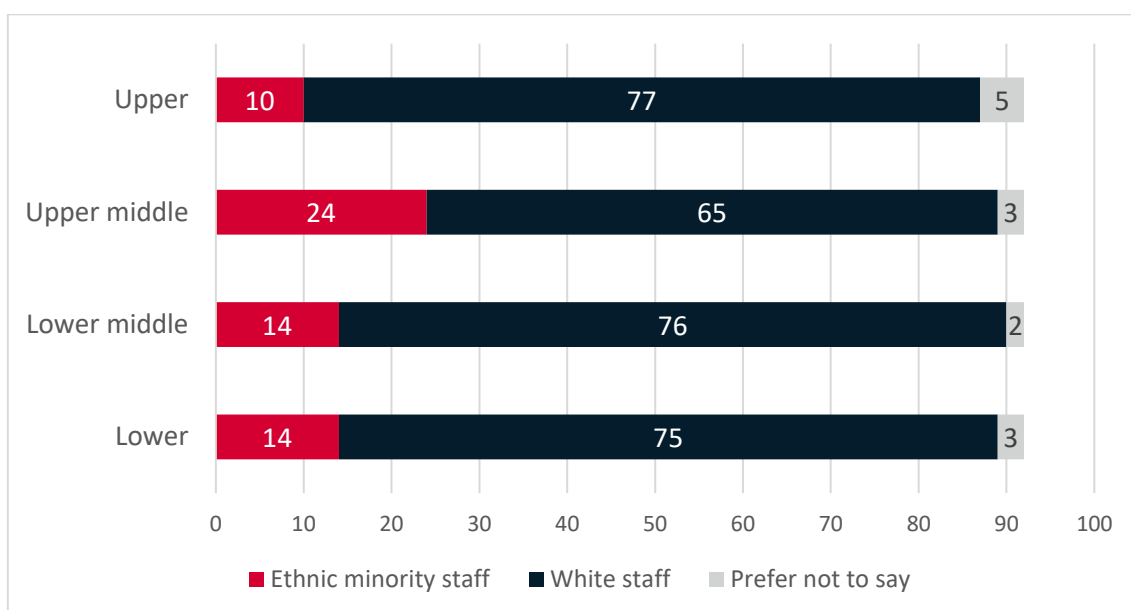
	Ethnicity minority staff earnings are:	Previous year 2023
Mean ethnicity pay gap in hourly pay	6.1% lower	8.4% lower
Median ethnicity pay gap in hourly pay	3.7% higher	0% lower

Proportion of ethnic minority, white, and prefer not to say staff in each pay quartile:



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Number of ethnic minority, white, and prefer not to say staff in each pay quartile:



Total workforce:

Year	Ethnic minority staff	White staff	Prefer not to say	Total	Total change
2024	62	293	13	368	1.9% increase
2023	59	280	22	361	2.6% increase
2022	56	271	25	352	n/a – first reporting year

3.2 Observations about ethnicity pay gap

This is the third year of reporting on our ethnicity pay gap and previous concerns over the number of prefer not to say responders are slowly reducing, with a significant decrease (down 41%) compared to last year. There has also been a similar increase in both the white and ethnic minority populations (of 5%). However, the spread of this increase for our ethnic minority population is focused within the upper middle quartile, which largely consists of Associate Lecturers. This is unsurprising because we know this staff population is more ethnically diverse than others. The resulting impact is our median ethnicity pay gap is particularly low.

Although the population of ethnic minority staff has increased since the previous year, we are concerned by the level of representation in the lower quartiles and particularly in the upper quartile. Now we have more fuller responses from staff, we can consider what we can do to help increase representation across quartiles.

The decrease in the mean and median ethnicity pay gap is positive, but we need to remember that the population sizes between white and ethnic minority staff are drastically different. Given the

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majority of ethnic minority staff sit within the upper middle quartile, we should be mindful any reduction in size of this group may change these figures in a negative way.

To help contextualise the above points, the ratio split between quartiles is noted below:

- Overall: for every 1 ethnic minority staff, there are 4.7 white staff
- Lower quartiles: for every 1 ethnic minority staff, there are 5.4 white staff
 - Lower quartile: for every 1 ethnic minority staff, there are 5.4 white staff
 - Lower middle: for every 1 ethnic minority staff, there are 5.4 white staff
- Upper quartiles: for every 1 ethnic minority staff, there are 4.2 white staff
 - Upper middle: for every 1 ethnic minority staff, there are 2.7 white staff
 - Upper quartile: for every 1 ethnic minority staff, there are 7.7 white staff

3.3 Ethnicity bonus data

In the reporting year 2023-24, 228 employees received a bonus; 28 were ethnic minority staff, 192 were white staff, and 8 were prefer not to say staff. All bonuses paid were based on performance, with the majority being discretionary and others based on the contract of employment.

For those bonuses paid, the **mean bonus ethnicity pay gap was 40.3%** and the **median bonus ethnicity pay gap was -26.3%**.

Summary of the key reporting data:

	Ethnic minority staff bonuses are:	Previous year 2023
Difference in mean bonus payments	40.3% lower	91% lower
Difference in median bonus payments	26.3% higher	8.5% lower

Proportion of ethnic minority, white, and prefer not to say staff receiving a bonus payment:



3.4 Observations about ethnicity bonus gap

Whilst we are still concerned by the ethnicity bonus gap, we are pleased to see that the mean has more than halved since last year (50.7% decrease).

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The mean gap although reduced is still high and is likely due to the lack of ethnic diversity in our upper pay quartile, in particular our executive employees. As already stated, bonuses for these employees are higher, therefore they greatly contribute to the mean bonus gap.

Other factors contributing to the gap which have been in existence in previous reporting years, include the following:

- Associate Lecturer staff are not eligible for a bonus, as the nature of their employment does not fall within the Performance and Development Review process where bonuses are considered. This is a large proportion of staff missing from the bonus calculation (95 staff). This is also a more ethnically diverse staff population.
- Other staff not eligible for a bonus includes but is not limited to new starters and those within their probationary period (48 staff).
- The ethnic minority population size is much smaller which causes a more significant impact to calculated differences.

3.5 Benchmarking (pay and bonus)

Ethnicity pay gap reporting is neither compulsory nor consistent, therefore our ability to appropriately benchmark is already compromised by a lack of available data.

When looking at the Universities and Colleges Employers Association (UCEA) Intersectional Pay Gap in Higher Education report (2024, January), we can see a median pay gap of 2.6% and mean of 4.7% for the year 2021-22. It also showed a bonus gap of -0.5% median and -3.8% mean. As previously stated not only is the data over two years old, but their methodology differs, participation is voluntary and bonus payments in HEI's are very much not the norm.

We have also looked to the CIPD who published a UK ethnicity pay gap report* (2024, January). The data used was based on the snapshot date 5 April 2023 and shows a mean pay gap of 13.1% and median of 16.8%, as well as a mean bonus gap of 7.5% and median of 0.0%.

*Chartered Institute of Personnel and Development for National Statistics (CIPD), released January 2024, CIPD website, [Our UK ethnicity pay gap report](#)

As you can see, both of these benchmarks vary greatly and whilst they suggest we are doing quite well in our median pay gap and bonus gap, our mean does not quite align, particularly for our bonus gap.

We must be cautious in our considerations to utilise ethnicity benchmarking data and also remind ourselves that the population sizes within our dataset are small, therefore slight changes could swing these results in very different directions.

4. Disability pay gap

4.1 Disability pay data

We collected our data on 5 April 2024, when our workforce consisted of 81 known disability staff, 265 no known disability staff, and 22 staff who responded to our EDI data collection questionnaire by choosing the prefer not to say option or did not respond at all; this is a total workforce of 368 (22% known disability, 72% no known disability, 6% prefer not to say). This is the first time we are reporting on this data and therefore there are no comparisons to the previous year.

The mean disability pay gap is the difference between the average hourly earnings of no known disability staff and known disability staff. The figures show that UCEM has a **mean disability pay gap**

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of **10.7%**. The average hourly pay rate for no known disability staff is £23.00 and for known disability staff is £20.54, which is a difference of £2.46 per hour.

The median disability pay gap is the difference between the midpoints in the ranges of average hourly earnings of no known disability staff and known disability staff. The figures show that UCEM has a **median disability pay gap of 17.5%**. The midpoint for no known disability staff is £22.18 and known disability staff is £18.29, which is a difference of £3.89 per hour.

Whilst this is the first time reporting on disability pay gap, as a starting point the data suggests further investigation and monitoring is required, particularly with the median pay gap.

In terms of the quartile populations, in the lower quartiles:

- In the **lower quartile** there were 31 known disability staff, 52 no known disability staff, and 9 prefer not to say staff.
- In the **lower middle quartile** there were 21 known disability staff, 67 no known disability staff, and 4 prefer not to say staff.
- In these lower quartiles, 28.3% of our staff group were known disability staff.

In the upper quartiles:

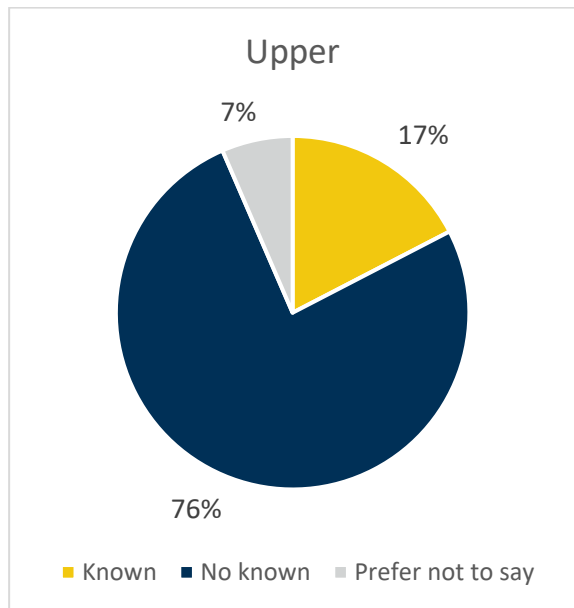
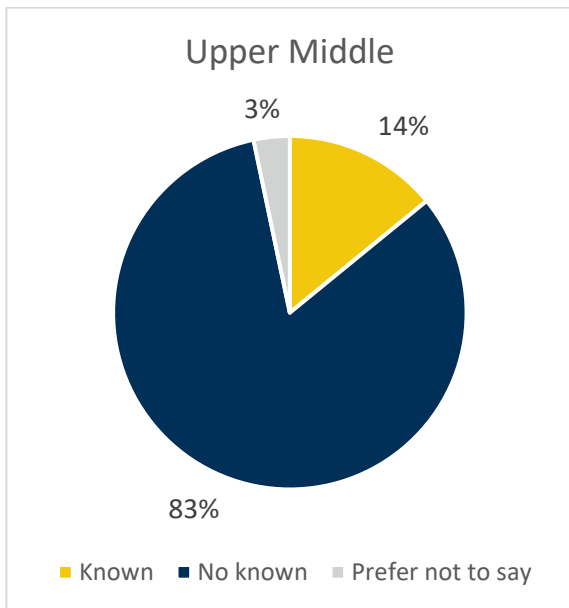
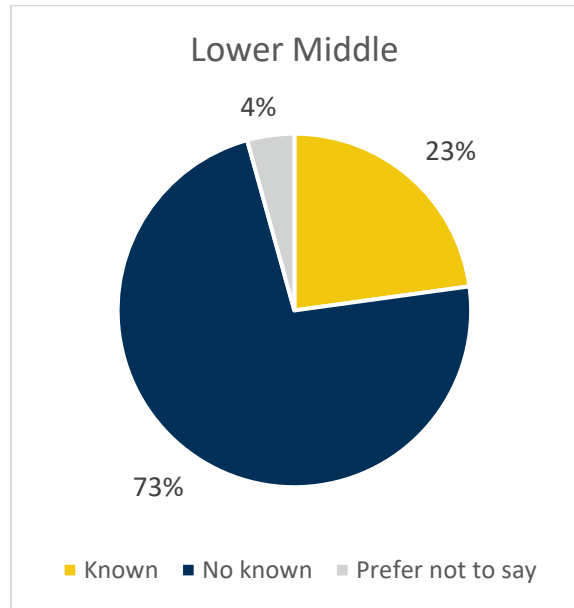
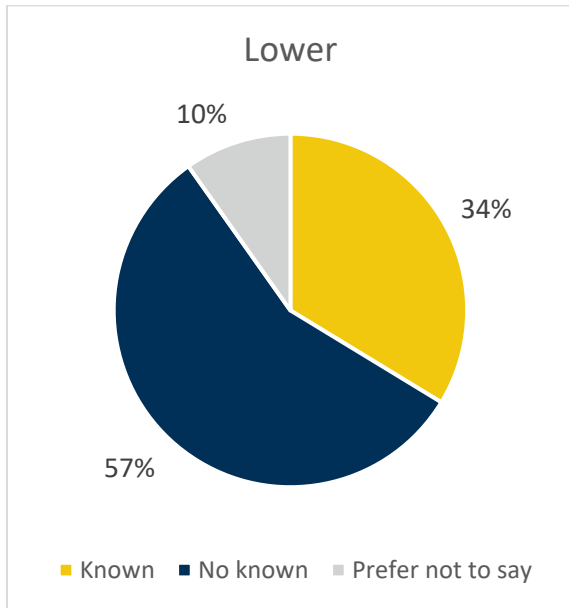
- In **upper middle quartile**, there were 13 known disability staff, 76 no known disability staff, and 3 prefer not to say staff.
- In the **upper quartile**, there were 16 known disability staff, 70 no known disability staff, and 6 prefer not to say staff.
- In these upper quartiles, 15.8% of our employee group were known disability staff.

Summary of the key reporting data:

	Known disability staff earnings are:	<i>Previous year 2023</i>
Mean disability pay gap in hourly pay	10.7% lower	<i>n/a – was not reported</i>
Median disability pay gap in hourly pay	17.5% lower	<i>n/a – was not reported</i>

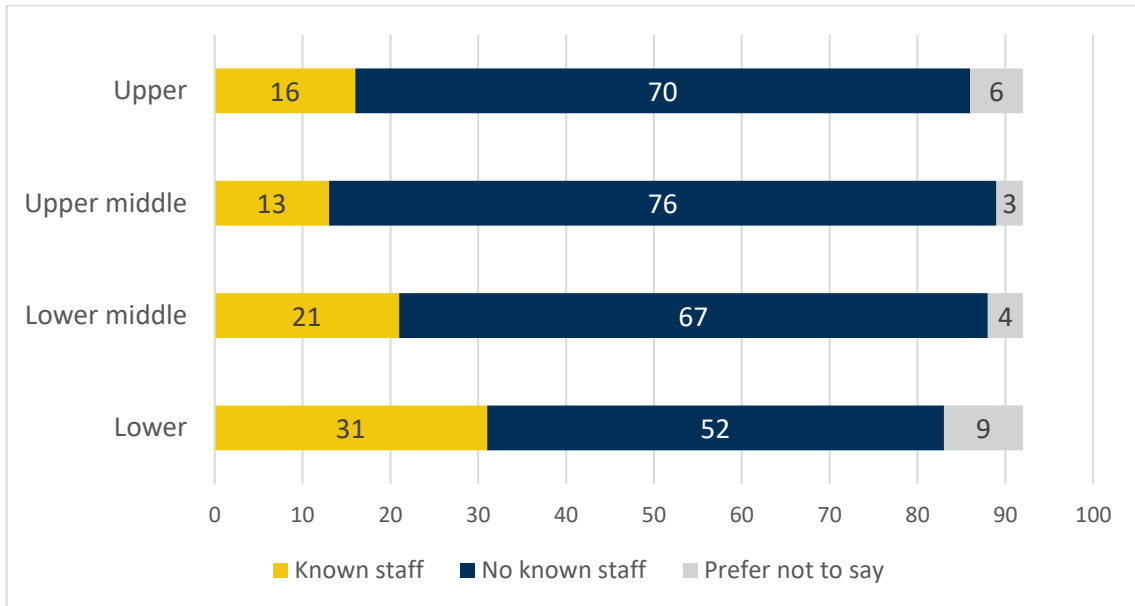
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Proportion of known disability, no known disability, and prefer not to say staff in each pay quartile:



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Number of known disability, no known disability, and prefer not to say staff in each pay quartile:



Total workforce:

Year	Known disability staff	No known disability staff	Prefer not to say	Total	Total change
2024	81	265	22	368	n/a – first reporting year

4.2 Observations about disability pay gap

This is the first-year reporting on our disability pay gap and therefore we do not have comparison data. We can however make some key observations, particularly about the population sizes and comparisons to other minority groups. There are more staff within our disability prefer not to say population than in our ethnicity prefer not to say population – something that could definitely be improved, as it will be contributing to the gap. There is also a clear difference in the known population size within the lower quartiles compared to the upper quartiles. This will be what is making a larger difference to the median calculation, which we can see is quite high, higher than the median gender pay gap.

To help contextualise the above points, the ratio split between quartiles is noted below:

- Overall: for every 1 known disability staff, there are 3.3 no known disability staff
- Lower quartiles: for every 1 known disability staff, there are 2.3 no known disability staff
 - Lower quartile: for every 1 known disability staff, there are 1.7 no known disability staff
 - Lower middle: for every 1 known disability staff, there are 3.2 no known disability staff

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- Upper quartiles: for every 1 known disability staff, there are 5 no known disability staff
 - Upper middle: for every 1 known disability staff, there are 5.8 no known disability staff
 - Upper quartile: for every 1 known disability staff, there are 4.4 no known disability staff

4.3 Disability bonus data

In the reporting year 2023-24, 228 employees received a bonus; 61 were known disability staff, 154 were no known disability staff, and 13 were prefer not to say staff. All bonuses paid were based on performance, with the majority being discretionary and others based on the contract of employment.

For those bonuses paid, the **mean bonus disability pay gap was 21.4%** and the **median bonus disability pay gap was 0.9%**.

Summary of the key reporting data:

	Known disability staff bonuses are:	Previous year 2023
Difference in mean bonus payments	21.4% lower	<i>n/a – was not reported</i>
Difference in median bonus payments	0.9% lower	<i>n/a – was not reported</i>

Proportion of known disability, no known disability, and prefer not to say staff receiving a bonus payment:



4.4 Observations about disability bonus gap

This is the first year we have completed this calculation and whilst we are pleased to see both disability bonus gap calculations are relatively low comparatively to our other minority categories, further investigation is required to understand whether there is work to be done.

It is likely the results of our median difference can be largely attributed to the methodology utilised as part of our PDR bonus distribution (i.e. fixed amounts rather than percentage of salary) which appears to have had a positive effect. Similarly to our ethnicity bonus gap, it is probable the mean difference is accounted for by the bonuses received by some employees, particularly those in our executive, where we have a larger population of no known disability compared to known disability. These bonuses are higher amounts which will be contributing to this gap.

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Other contributing factors which have been observed with other minority groups and have been in existence for some time, include the following:

- Associate Lecturer staff are not eligible for a bonus, as the nature of their employment does not fall within the PDR process where bonuses are considered. This is a large proportion of staff missing from the bonus calculation (95 staff) and it is also a population group with a lower distribution of those with a known disability or condition.
- Other staff not eligible for a bonus includes but is not limited to new starters and those within their probationary period (48 staff).
- Whilst larger than our ethnic minority population, the known disability population size is still quite small compared to the no known population which causes a more significant impact to calculated differences.

4.5 Benchmarking (pay and bonus)

Similarly to ethnicity pay gap reporting, disability pay gap reporting is not compulsory and very few organisations complete them. This does mean our ability to appropriately benchmark our data is severely compromised. Whilst the ONS does produce figures on the disability pay gap, this is using limited information and is largely an estimate.

Whilst ONS results are estimates and therefore provisional, we acknowledge that our median at 17.5% falls above the 2024 median national average* which currently sits at 12.7%.

*Office for National Statistics (ONS), released 17 October 2024, ONS website, statistical bulletin, [Disability pay gaps in the UK: 2014 to 2023](#)

We must always exercise caution when considering the utilisation of benchmarking and this is no different. We can see areas of potential improvement with our disability pay gap, which may be better to focus on whilst other organisations and institutions start publicising their own disability pay gap for comparison in the future.

5. Closing remarks

Work continues as part of the institutional Equality, Diversity, and Inclusion (EDI) planning to support further investigation and potential improvement of these figures. We can already see our aim to reduce prefer not to say respondents has made traction since our previous report.

We would like to implement more formal action planning as part of our pay gap reporting, to ensure we are prepared and ahead of the proposed changes to statutory requirements. We also see this as positive action as part of our EDI commitment and strategy.

The snapshot date of 5 April in one year and the reporting deadline of 4 April in the subsequent year always means we report 'old' data. It is likely that actions taken to reduce gender, ethnicity, and disability pay gaps will take time to show in the published data (two to three years), but nonetheless we will continue to strive for progress in each year, from this point forward.