

Brighton & Hove City Council Disability Pay Gap Report 2025-26

1. Introduction

- 1.1. The council is publishing the workforce disability pay gap on a voluntary basis. In the absence of a mandatory framework for reporting, the council have chosen to replicate the regulations and measures used in gender pay gap reporting with some changes, to account for the different data sets, see 1.4. Therefore, this report includes:
- the mean and median disability pay gaps
 - the mean and median disability pay gaps including the gap for employees who have not disclosed a status
 - the mean and median disability bonus pay gaps
 - the proportions of disabled and employees who received a bonus
 - the proportions of disabled employees and employees with no disability in each pay quartile
 - the proportions of disabled employees, employees with no disability, and employees who have not disclosed a status in each quartile
- 1.2. The reporting data includes council employees who have self-certified their disability status as either 'disabled' or as having 'no disability' and were employed on 31 March 2025. Apprentices, seasonal, temporary or casual employees are included if they fall within the reference period created by the snapshot date. Mirroring the gender pay reporting regulations, the data excludes schools-based staff.
- 1.3. The council's workforce equalities information is provided confidentially and voluntarily by employees. We actively encourage staff to share this data to help us understand our workforce profile and to inform actions aimed at reducing inequalities. However, disclosure is not mandatory. As at the reporting date, 81% of employees stated whether or not they identify as having a disability. The remaining employees either chose not to disclose their status or did not specify an answer. We are aware that some staff tell us they are not disabled, but then describe a disability or long-term health condition. For example dyslexia or diabetes. Because our analysis relies on the binary responses provided, this means the data does not always robustly reflect the true profile of our workforce.
- 1.4. The gender pay gap report compares two clearly defined groups, male and female, whereas disability reporting is structured differently. Disability status is recorded across two main categories (disabled and non-disabled), alongside groups where no data is available: blank (not recorded) and unspecified (chose not to answer). Because gender data for statutory pay gap reporting cannot include blank or unspecified entries, all gender records must be complete. For the purpose of calculating the mean and median disability pay gaps, we have focused on employees who have actively stated their disability status, as blank or undeclared records could represent either disabled or non-disabled individuals. The blank and unspecified categories are, however, reported separately within the council's report at sections 3.4 and 3.5.2.

- 1.5. The council publishes this information on its website.
- 1.6. This report relates to the snapshot date of March 31st 2025.

2. Disability Pay Gap and Equal pay

- 2.1 Pay gap reporting is different to equal pay. Pay gaps measure the difference in average hourly pay between different groups. Unlike equal pay audits, which look at the difference in pay between people with different characteristics doing the same job, pay gap reporting looks at the wider picture across the workforce.
- 2.2 The disability pay gap is a measure of the difference in average ordinary earnings (excluding overtime) between employees with no disabilities and employees with a disability across the workforce. It is expressed as a percentage of the earnings of employees with no disabilities. Both the mean (average) and median hourly rates are reported.
- 2.3 The Equality Act 2010 makes it unlawful to discriminate (both directly and indirectly) against employees (and people seeking work) because of their disability. An employer can be equal pay compliant and still have a disability pay gap. The cause of a disability pay gap may not fall within the direct control of the employer and is likely to be due to other factors that impose a disadvantage on people with a disability without being explicitly discriminatory.
- 2.4 The council supports the fair treatment and reward of all staff irrespective of disabilities or other characteristics. This report sets out the council's disability pay gap and provides reference to the council's action plan to tackle the gap.

3. Disability Pay Gap Reporting

- 3.1 Mean and Median Pay Gap Reporting: Brighton & Hove City Council has a negative median pay gap and a positive mean pay gap when measured using gross hourly earnings.
- 3.2 The **Median** (middle) disability pay gap in hourly pay is **-0.3%**.
- 3.3 The **Mean** (average) disability pay gap in hourly pay is **2.7%**.
- 3.4 The table below includes the headline pay gap measures, along with the gap between employees with no disability and employees who did not declare their status, both 'declined to specify' and 'not known'.

Group	Disabled	Not Known	Declined to specify
No Disability	Gap between No Disability and Disabled Groups Mean 2.7%	Gap between No Disability and Not Known Groups Mean 4.2%	Gap between No Disability and Declined to Specify Mean -0.1%

	Median -0.3%	Median 5.0%	Median -2.5%
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3.5.1 **Salary quartile reporting** is calculated by sorting employees by their average hourly earnings, from the lowest to the highest, then splitting them into four equal quartiles to show the proportions of disabled employees and employees with no disability in each group. Definitions of the salary quartile information are shown in Appendix A.

Quartile & Hourly earning rate range	No disability % in Quartile	Disabled % in Quartile
1. Lower Quartile £8.46 - £15.58	89.3%	10.7%
2. Lower Middle Quartile £15.58 - £18.26	91.6%	8.4%
3. Upper Middle Quartile £18.26 - £21.92	89.1%	10.9%
4. Upper Quartile £21.93 - £85.01	91.4%	8.6%

3.5.2 **Salary quartile reporting, including employees who have not disclosed their status**, is calculated by sorting employees by their hourly rate, from the lowest to the highest, then splitting them into four equal quartiles to show the proportions of disabled employees, employees with no disability, those who declined to specify their status, and those not known in each group.

Quartile & Hourly earning rate range	No disability % in Quartile	Disabled % In Quartile	Not known % in Quartile	Declined to specify % in Quartile
1. Lower Quartile £8.46 - £15.58	68.0%	8.2%	20.6%	3.1%
2. Lower Middle Quartile £15.58 - £18.26	76.1%	6.9%	14.3%	2.7%
3. Upper Middle Quartile £18.26 - £21.52	73.0%	8.9%	14.7%	3.5%
4. Upper Quartile £21.54 - £100.94	76.2%	7.4%	13.3%	3.1%

3.6 Bonus pay reporting. The council does not pay bonuses, as such no figures are reportable.

4. Supporting Narrative

4.1 The council's overall workforce disability profile based on this reporting data is 90.2% with no disability and 9.8% disabled. These figures exclude employees who have declined to provide their disability status (892).

4.2 3,921 employees are included in the reporting data. These employees held 4025 job roles in the pay period comprising of 3,785 contracted roles and 240 casual roles. As per applied reporting methodology, employees on less than full pay have been excluded.

- 4.3 The mean hourly rate of pay for disabled employees was £19.57. The mean hourly rate for employees with no disability was £20.11, this results in the reported 2.7% difference.
- 4.4 The median hourly rate of pay for disabled employees was £18.32. The median hourly rate for employees with no disability was £18.26, this results in the reported -0.3% difference.
- 4.5 **Salary Quartiles.** Across all four salary quartiles, the proportion of disabled employees is lower than the proportion of employees who report having no disability, which is consistent with the overall workforce disability profile of 9.8%. Representation is highest in the Lower Quartile and the Upper Middle Quartile, where 10.7% and 10.9% of employees respectively identify as disabled. These figures reflect increases of 1.2% and 2.4% compared with the previous year. In the Upper Middle Quartile, disabled representation stands at 8.4%, a decrease of 1.4 percentage points from the previous year. In the Upper Quartile, disabled employees represent 8.6% of the workforce, marking a 1% increase on last year's figure.
- 4.6 **Men and Women.** Among female employees, 10.3% identify as disabled, compared with 9.1% of male employees. The median disability pay gap for disabled female employees is 1.7%, while for disabled male employees it is -3.6%. These figures represent year-on-year changes of -4% and -3.5% respectively. This means that the median earnings of disabled female employees are 1.7% lower than those of female employees with no disability, whereas disabled male employees have median earnings 3.6% higher than their non-disabled male counterparts.

Pay of allowances. During the snapshot pay period, 28.8% of the workforce received an allowance in addition to basic pay. Overall, 20.3% of disabled employees received an allowance, compared with 29.7% of employees with no disability. These figures represent year on year increases of 2.6% and 0.1% respectively.

- 4.7 **Pay & Grading.** The council's annual pay policy statement provides details of the council's pay and grading arrangements and can be referenced via the link at Appendix B.
- 4.8. Further analysis on the workforce profile for disabled workers can be found in the annual workforce equalities report via the link at Appendix C.

5. How figures compare nationally

- 5.1 The Office of National Statistics (ONS) reported a UK median disability pay gap of 12.7% in 2023, a gap which has remained relatively stable since 2014. This is 13% higher than the BHCC reported median pay gap of -0.3%. The ONS data for 2024 & 2025 is yet to be released. Link to the ONS reported data can be found at Appendix D. It is important to note that employees of the council have self-certified their disability status whereas the ONS use the Government

Statistical Service (GSS) harmonised “core” definition. Details on the identifiers used by GSS can be found on the link at Appendix E.

- 5.2 The ONS have reported that the UK 2023 disability pay gap was wider for men (15.5%) than for women (9.6%). The council’s disability pay gap for 2024 is 1.7% for disabled women, and -3.6% for disabled men.

6. Summary & Actions

- 6.1 The council is confident that its disability pay gap does not stem from an equal pay issue. In 2010 the council introduced a new pay and grading system to ensure all roles are graded using a recognised job evaluation system to make sure individuals receive equal pay for equal work. In 2013 a new system of allowances and expenses was implemented to ensure consistency across the workforce.
- 6.2 The council’s median disability pay gap indicates that, on average, disabled employees earn 0.3% more than employees who report having no disability, which contrasts with the national trend. Quartile analysis show increases of 2.4% in the Upper Middle Quartile and 1% in the Upper Quartile. This reflects a year on year rise in the proportion of disabled employees represented in middle graded roles, and higher management graded roles across the organisation.
- 6.3 The council’s workforce is predominantly female, representing 58% of employees included in this reporting period. Among male employees, 9.1% identify as disabled, compared with 10.3% of female employees. As a higher proportion of female employees occupy roles at higher grades, and given the overall gender composition of the workforce, a slightly smaller proportion of disabled men hold higher paid positions compared with disabled women.
- 6.4 The council is committed to building a workforce that truly reflects the diversity of our city and disability forms part of our wider inclusion agenda. Creating a fair and inclusive place to work is one of the five commitments of ‘Our People Promise’ made to employees. The work programme to deliver this promise, our co-created ‘Fair and Inclusive Action Plan’ sets out a comprehensive range of actions designed to strengthen the recruitment, retention and progression of disabled staff, ensuring that opportunity is visible, accessible and real.

. See Appendix F for a link to the Council’s Fair & Inclusive Action Plan.

Appendix A

Hourly Pay Definition for the purposes of calculating the mean and median hourly rates.

Pay will include:

- basic pay

- paid leave, including annual leave, sick leave, maternity, paternity, adoption or parental leave (except where an employee is paid less than usual because of being on any such leave)
- area and other allowances
- shift premium pay
- pay for piecework
- bonus pay

It will not include:

- overtime pay
- expenses

Full-pay Relevant Employee Definition

“Full-pay relevant employee” means a relevant employee who is not, during the relevant pay period, being paid at a reduced rate or nil as a result of the employee being on leave. Employees who receive no pay at all during the relevant pay period, whether or not this is as a result of being on leave are excluded from the ethnicity pay gap calculations. “Leave” includes—

- (a) annual leave
- (b) maternity, paternity, adoption, parental or shared parental leave
- (c) sick leave and
- (d) special leave

Pay Quartiles

This calculation requires an employer to show the proportions of disabled employees and employees with no disability “full-pay relevant employees” in four quartile pay bands. This is done by dividing the workforce (so far as possible) into four equal sections to determine the lower, lower middle, upper middle and upper quartile pay bands. Where employees receiving the same hourly rate of pay fall within more than one quartile pay band, a relative proportion of disabled employees and employees with no disability receiving that rate of pay were assigned to each of those pay quartiles.

Appendix B Link to Council’s Pay Policy Statement: <https://www.brighton-hove.gov.uk/jobs/council-jobs/pay-policy-statement>

Appendix C Link to Council’s annual workforce equalities report: [Workforce Equalities Report 2023 to 2024](#)

Appendix D ONS Disability pay gaps in the UK: 2023
[Disability pay gaps in the UK - Office for National Statistics](#)

Appendix E Link to the ONS disability status definition:
<https://gss.civilservice.gov.uk/policy-store/measuring-disability-for-the-equality-act-2010/>

Appendix F Link to the Council's Fair and Inclusive Action Plan:
<https://www.brighton-hove.gov.uk/fair-and-inclusive>