



***HEATHROW AIRPORT LIMITED –  
EQUALITY, DIVERSITY & INCLUSION  
OF COLLEAGUES AT SENIOR LEVELS  
PRINCIPLES AND METHODOLOGIES 2025***



**Heathrow**

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# 1. INTRODUCTION

## 1.1. Context

The purpose of this document is to explain the approach taken by Heathrow Airport Limited (HAL) in collating and reporting our selected Equality, Diversity and Inclusion (EDI) information, published in Heathrow's Sustainability Report 2025. The information includes reporting of the following metrics subject to independent limited assurance procedures for the year ended 31 December 2025 (referred to as 'metrics' hereafter):

- % of female colleagues at senior levels (Exec - Band C)
- % of Black, Asian and Minority Ethnic colleagues at senior levels (Exec - Band C)

*'Our Vision is 'To be an extraordinary airport, fit for the future'. To me, extraordinary means a place where you experience something you can't experience somewhere else. A key element of us achieving this is creating the right inclusive culture where diverse colleagues can thrive, being themselves to enable the successful delivery of Heathrow's vision with a true sense of belonging.'*

*Thomas Woldbye, Chief Executive Officer <sup>1</sup>*

In line with our EDI strategy, it is important for us to have a data led approach when understanding the demographics of our workforce, so that we can provide the right action to ensure Heathrow is an Extraordinary Place to Work for all colleagues.

## 1.2. Reporting Boundary

The structure of Team Heathrow is multifaceted and services are delivered by hundreds of companies including airlines, retailers, UK Government, Air Traffic Control and many more.

These metrics solely cover our employees - individuals who have a contract of employment with LHR Airports Limited, Heathrow Express Operating Company Limited or Business Support Centre Limited. Employees are hereafter referred to as 'colleagues'.

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<sup>1</sup> [Heathrow Gender Pay Gap 2024](#)

The reporting year commenced 1<sup>st</sup> January 2025 and ended 31<sup>st</sup> December 2025. These metrics only include those who were employed on the last day of the reporting period (the 'snapshot' date), and this is calculated on a headcount basis.

Colleagues fulfilling all of the following criteria as of the snapshot date at the end of the year (31<sup>st</sup> December 2025) are included within these calculations:

- Active on payroll.
- A HAL colleague, a HAL rostered colleague, HEx (Heathrow Express) colleague, Rail colleague.
- Contracted to an exec band, band A, band B or band C grade as defined within their contract of employment (considered a 'Senior level').

The following colleagues are not included:

- Non executive Directors.
- Those not on our payrolls such as Contingent Workers, third party workers or approvers.
- Those not contracted to an exec, band A, band B or band C grade as defined within their contract of employment.

## **2. METHODOLOGY**

### **2.1: % of female colleagues at senior levels (Exec - Band C)**

This metric is calculated as follows:

- Gender is taken in accordance with a colleague's legal gender according to their right to work document, with two options that can be selected: either 'male' or 'female'.
- This is entered by our HR team to ensure that it matches the right to work document provided (and validated by TrustID independent verification).

The individual level data is exported from our HR system using a pre-built and validated report. This data is processed in accordance with agreed internal processes, and analysis is completed through pivot tables. Again in line with internal processes, this is peer reviewed to ensure correct processes are followed.

The metric is calculated by taking the total number of female colleagues meeting the definition of a 'senior level' in section 1.2, dividing by the total number of colleagues meeting the definition of a 'senior leader' in section 1.2, represented as a percentage and rounded to one decimal place.

## 2.2: % of Black, Asian and Minority Ethnic colleagues at senior levels (Exec - Band C)

- During the recruitment process, candidates are invited to declare their ethnicity. This is a mandatory field (with a 'prefer not to say' option available). The current process is for candidates to do this electronically through their online job application, however for colleagues who started before our current HR system was in operation, declarations were captured in line with the process at the time. For colleagues that started before the current HR system was in place, ethnicity may remain undisclosed.
- Once a candidate is offered a role, this declaration then transfers into their colleague record.
- Once a colleague starts, they are actively encouraged to confirm or update their ethnicity declaration through our central HR system (Theo). This is not a mandatory field and colleagues can leave the declaration blank or select 'prefer not to say'. Whenever an ethnicity is confirmed or updated in Theo, that will be taken as the most up to date and accurate declaration, taking precedence over any other declaration.
- Aligned to the Government guidelines<sup>2</sup>, colleagues declare their individual ethnicity level per the 'ethnicity self-selected by colleague' column in Table 1 below (e.g. Asian/Asian British – Indian) which is then grouped into categories as per 'corresponding ethnicity grouping' column in Table 1 below (e.g. Black, Asian and Minority Ethnic).

Table 1: Ethnicity groupings

Ethnicity self-selected by colleague	Corresponding Ethnicity grouping
White - English/Welsh/Scottish/Northern Irish/British	White
White - Irish	White
White - Traveller	White
White - Any other White background	White
Mixed - White and Black Caribbean	Black, Asian & Minority Ethnic
Mixed - White and Black African	Black, Asian & Minority Ethnic
Mixed - White and Asian	Black, Asian & Minority Ethnic
Mixed - Any other Mixed/multiple ethnic background	Black, Asian & Minority Ethnic
Asian/Asian British - Indian	Black, Asian & Minority Ethnic
Asian/Asian British - Pakistani	Black, Asian & Minority Ethnic

<sup>2</sup> [ONS Census 2021 Ethnic group, national identity and religion](#)

<b>Asian/Asian British - Bangladeshi</b>	Black, Asian & Minority Ethnic
<b>Asian/Asian British - Chinese</b>	Black, Asian & Minority Ethnic
<b>Asian/Asian British - Any other Asian Background</b>	Black, Asian & Minority Ethnic
<b>Black/Black British - African</b>	Black, Asian & Minority Ethnic
<b>Black/Black British - Caribbean</b>	Black, Asian & Minority Ethnic
<b>Black - Any other Black/African/Caribbean background</b>	Black, Asian & Minority Ethnic
<b>Arab</b>	Black, Asian & Minority Ethnic
<b>Any Other Ethnic Group</b>	Black, Asian & Minority Ethnic
<b>Prefer not to Say</b>	Prefer not to Say
<b>Undisclosed</b>	Not declared

The individual level data is exported from our HR system processed in accordance with agreed internal processes, analysed through pivot tables and peer reviewed.

The metric is calculated by taking the total number of 'Black, Asian and Minority Ethnic' colleagues meeting the definition of a 'senior level' in section 1.2 and dividing this by the total number of colleagues meeting the definition of a 'senior level' in section 1.2, represented as a percentage and rounded to one decimal place. Should a colleague not declare their ethnicity (either left blank or prefer not to say), they are still included within the denominator.

We acknowledge that our calculations take a binary approach to gender and use the term Black, Asian and Minority Ethnic which are imperfect and do not represent the full identities of many of our colleagues.