HM Treasury

Women in Finance Charter

Annual update submission form – companies with 250 staff or less†

NB: This Word document is to help you prepare your organisation's responses which must then be submitted via the HM Treasury Annual Update Portal.

Please complete all relevant questions as fully as possible. We ask that you undertake reasonable checks to ensure the data submitted is correct before submitting it via the portal. If you have any queries regarding your submission, please refer to the Annual Update Guidance here before contacting us.

Compulsory responses are marked with an asterisk *. The non-compulsory responses provide a suggested framework for both data and narrative reporting, based on feedback from signatories.

The information provided in your response will be aggregated, anonymised and presented in the Annual Review of Charter signatories, to be compiled by our data partner New Financial and published in March 2026 (TBC). To read HM Treasury's privacy statement and New Financial's data privacy statement, please click here.

The Annual Review will highlight progress and share best practice in a constructive, positive way (click here to see the most recent Annual Review). No information will be attributed without the express permission of the relevant signatory. If we do seek this permission, we will contact you in good time ahead of publication.

We want to know about your successes but also get a true picture of where you have faced challenges. Please be as frank and as open as you can be in your responses, including where a target may not have been met. Note there is no wordcount limit for your responses.

Submissions should be completed and submitted via the portal **by September 30 2025**. If you are able to submit your form earlier, we encourage you to do so.

†If your company has more than 250 staff in the total workforce, please click here to download the relevant submission form for your organisations.

Section A) Company and workforce details		
1*	Name of signatory company	Castle Trust Bank
2*	Number in total workforce to which the Charter applies	*Select from:* • *250 or less* *NB: Selecting "More than 250" will lead to a different set of questions from what you see below. If your company has more than 250 in the total workforce, please click here to download the relevant submission form for larger organisations.*

Section B) Signatory information		
1*	Please select the sector which best describes the entity to which the Charter applies:	*Select from:* • *UK banking* •
2*	Is Charter signatory FCA/PRA-regulated or does it conduct regulated activities?	*Select from:* • *Yes*
3*	Location of UK headquarters *Town/ city*	London
4*	Type of entity to which Charter commitment applies	*Select from:* • *Ltd*
5*	Nationality of group/parent (If applicable)	UK

Section C) Accountable executive		
NB: Please provide contact details for the Accountable Executive (AE) via the "Contact Management" tab in the portal. Information required: • *Name* • *Email* • *Job title*		
PLEASE NOTE: SME signatories (250 or less staff) will not see questions 1-7.		
8a*	Please confirm this submission form has been seen and approved by the AE	*Select from:* • *Yes (if yes, go to "Next". Question 8b will not be visible)*
8b*	Please explain why this submission has not been seen and approved by the AE	

Section D) Senior management definition		
1a*	What is the firm's definition of senior management? ***NB**: this definition must be the same as the senior management population to which your target refers in section F and the senior management data provided in section E*	ExCo and Senior Management at Job Level grade 3 and above.
2a*	Has this definition changed since your previous submission to HMT?	*Select from:* • *No (if no, go to "Next". Question 2b will not visible)*
2b*	Please specify the change and why the change has been made. ***PLEASE NOTE:*** • *The WIFC Annual Review lists all signatories that have changed their senior management definition (not applicable to SMEs).* • *Any firms seeking to change their senior management definition in their target deadline year will need to provide senior management data in section E as per their previous definition.*	

Section E) Senior management data			
The data provided in this section should correspond to the senior management population to which your target refers in section F and as defined in section D. ***NB:*** • *If your firm has undergone a change in senior management definition and/or structural change since your last submission, please provide the corresponding data to reflect the change both this reporting year **and** the previous year for comparison purposes.* • *Any firms seeking to change their senior management definition in their target deadline year will need to provide senior management data in section E as per the **previous** definition.*		2024 (Previous year)	2025 (Current year)
PLEASE NOTE: Questions 1b, 1c, 1e, 2,3, 5 and 6 will note be visible to SME signatories (250 or less staff)			
1a*	Number of staff in total workforce ***NB**: If senior management population is regional or global, the total workforce number should correspond to the same region from which senior management may be drawn*	192	195
1d*	Number of staff in senior management population	45	47
1f*	Number of female senior managers	14	16

1g*	Female senior managers as percentage of total senior management *Calculation: (answer 1f ÷ answer 1d) x 100%*	31%	34%
4*	Please provide the date to which the data in this submission relates *DD/MM/YY*	02/09/2024	01/09/2025
7	If there is any further information relating to this section that you would like to submit to HM Treasury, please do so here:		

Section F) Headline senior management target(s)		
PLEASE NOTE: *The target should be as per last year's submission, and must be based on the same senior management population defined in section D and the senior management data provided in section E. If your organisation has changed the target and/or deadline year and/or group to which the target applies, please respond "Yes" to question 1.* • *The WIFC Annual Review lists all signatories that have changed their target, including listing the previous and new targets (see Appendix of the latest annual review).* • *Any signatories seeking to change their target or deadline in the deadline year of their original target will be held accountable in the Annual Review against their original target and deadline.*		
1*	Has the target, deadline, or group to which the target applies changed since last year's submission? *Yes/No*	*Select from:* • *Yes (if yes, answer 3a-d. Question 2 will not be visible)*
2a*	What is the target(s) for female representation in senior management?	35%
2b*	What is the target deadline? • *We will treat the deadline as the end of the given year unless a specific date is provided.* • *If no deadline is specified, your organisation will be held accountable against the target every year in the Annual Review.*	31/12/2026
3a*	What is the new target(s) for female representation in senior management?	Adjusted deadline to 31/12/2026 from 31/12/2025
3b*	What is the new deadline? ***NB**:* *• We will treat the deadline as the end of the given year unless a specific date is provided.* *• If no deadline is specified, your organisation will be held accountable against the target every year in the Annual Review.*	31/12/2026
3c*	What is the region to which the new target applies?	UK
3d*	Why did you choose this target?	Whilst there is a chance we will hit our original target by the end

		of December 2025 we intend to adjust the target deadline to reflect the headcount and recruitment plans for the remainder of 2025 and into 2026.
If your deadline has passed or is by the end of 2025, please answer question 4. *If your deadline is in the future, please answer question 6.* *If you have multiple headline targets, please answer 4 and/or 6 for each target as relevant.*		
4	Is your target deadline due this year?	*Select from:* • *Yes (if yes, go to 5a)*
5a*	Have you met your target(s)? ***NB**:* *The WIFC Annual Review lists all signatories that have hit their target.*	*Select from:* • *No (if no, go to 5b. Question 6 will not be visible)*
5b*	Please explain why and set out any plans to achieve the target. ***NB**:* *The WIFC Annual Review lists all signatories that have missed their target and why in the appendix.*	Castle Trust Bank is a small employer with less than 200 colleagues, and therefore fewer senior management roles. Whilst we have seen slightly more attrition in this cohort in 2024 the movement is still quite slow given the small number of roles within the definition of senior management. We continue to be proactive in seeking opportunities to identify and hire female candidates in our senior population. We have had a little more movement in our senior management team in this financial year compared to previous years and we have had some success in recruiting new female colleagues into the bank. We are 1% away from achieving our target and have improved our results by 3% over the last 12 months, which we are very pleased about. We do still have 3 vacancies within the senior management cohort and therefore potentially could still meet our target by the end of December.

		We continue to operate a strong recruitment process that incorporates shortlisting a fair mix of both male and female candidates for every campaign. We are currently recruiting for some new senior management roles using the above approach and we are confident that we will secure a healthy balance of male and female hires. We remain committed to our target of meeting the industry average of 35% of women in senior roles with an adjusted deadline of 31/12/2026. We continue to have our WIF target at the core of many of our activities across the bank, including: - Regular reporting and assessment of gender mix of candidates during the recruitment process - Annual recruitment unconscious bias training to all hiring managers - Ensuring that there is a fair mix of male and female candidates in every single recruitment campaign - Mentoring programme in place for emerging female talent and robust development plans for this cohort. - Next level down from senior management female managers invited to attend external Women in Leadership training. Proactive engagement from the AE through attending external events and championing female talent in the workplace.
If your deadline is in the future (2026 and onwards), please answer question 6.		

6a*	Have you met your target early?	*Select from:* • *No (if no, go to 6b)*
6b*	Are you on track to meet your target (*based on your own rationale for interim progress*)?	*Select from:* • *Yes*
7	If there is any further information relating to this section that you would like to submit to HM Treasury, please do so here:	Whilst we experienced a setback in early 2024, we have continued to strive to get as close as we can to achieving our target. Whilst we have not quite achieved our target (by 1%) we have tracked forwards significantly this year. We remain confident that we will hold this position, if not achieve our target by the end of December 2025.

Section G) Actions to achieve targets
The questions in this section relate to larger signatories only. Please proceed to the next section.

Section H) Linking executive pay to targets		
1a*	Do you have a link between targets for female representation and pay?	*Select from:* • *Yes (if yes, go to "Next". Questions 1b and 1c will not be visible)* •
1b*	Are you planning to introduce a link to pay in the coming year?	*Select from:* • *Yes (if yes, go to "Next". Question 1c will not be visible)* • *No (if no, go to 1c)*
1c*	Please explain why your organisation does not have a link to pay.	

Section I) Webpage dedicated to Women in Finance Charter		
1*	Company URL where annual update is/will be published	Castle Trust Bank - everything you need to know about us

	PLEASE NOTE: • *All Charter signatories are required to publish an update on their progress towards their target on their company website by* ***Dec 31****.* • *Approval from* ***HMT*** *is* ***not needed*** *before publishing.*	

PLEASE NOTE: Pressing "Submit" at the end of Section I will submit the form to HM Treasury, and it will no longer be available to edit.