

Disability Pay Gap Report 2023-24

(based on data extract as of 31 March 2024)

1. Introduction

- 1.1 NHS Bedfordshire Luton and Milton Keynes Integrated Care Board (BLMK ICB) serves a local population of almost a million and is responsible for planning and allocating resources to meet the four core purposes of an Integrated Care System (ICS) to improve outcomes in population health and healthcare; tackle inequalities in outcomes, experience, and access; enhance productivity and value for money; and help the NHS support broader social and economic development.
- 1.2 This report sets out BLMK ICB's 2023/24 Disability Pay Gap (DPG) data, which was extracted from the NHS' Employee Staff Record (ESR) as of 31 March 2024.
- 1.3 It has been produced voluntarily, with reference to the government's guidance on [Voluntary Reporting on Disability, Mental Health and Wellbeing](#). In addition, it was mentioned in the July 2024's King's Speech that after the draft Equality (Race and Disability) Bill is enacted, it will enshrine in law the full right to equal pay for people from ethnic minority backgrounds as well as with a disability and introduce statutory ethnicity pay gap as well as disability pay gap reporting for organisations with more than 250 employees. In addition, the ICB is being proactive in understanding its' workforce disability pay data and, by so doing, in alignment with the [NHS Long-Term Workforce Plan](#) and [NHS Equality, Diversity and Inclusion Improvement Plan](#)'s High Impact Action 3 (HIA3): to "develop and implement an improvement plan to eliminate pay gaps".
- 1.4 This is the first time that the ICB has produced a DPG report. Hence, there is no available DPG data from a previous year for comparison. The DPG data would be used to monitor diversity, ascertain whether disparity or inequalities exist and inform decision-making on improvement actions to address inequalities, if any.

2. Definitions and Scope

- 2.0 Disability is defined as 'a physical or mental impairment/condition, which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities'. These conditions or impairments, which could be visible or hidden, may be cognitive, developmental, intellectual, mental, physical, sensory, or a combination of multiple factors.
- 2.1 Pay gap is the difference in the average pay between two groups.
- 2.2 'Disability Pay Gap' (GPG) measures the difference in the average pay between employees with a disability and without disability in an organisation's workforce.

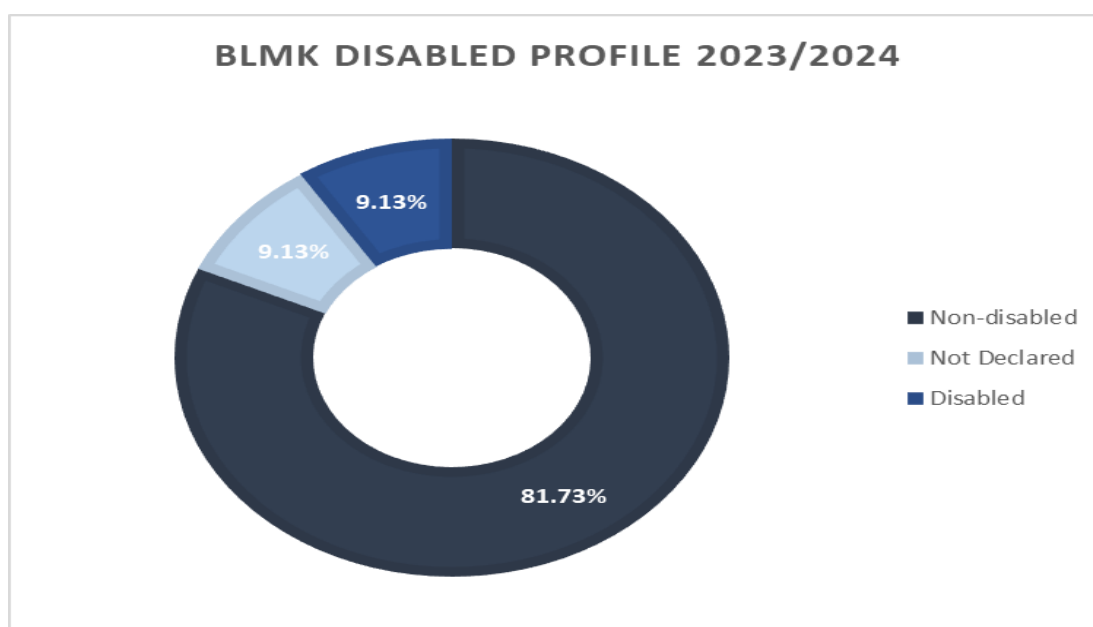
- 2.3 DPG is different from 'equal pay'. By law, people performing equal work or work of equal value must receive equal pay. It is unlawful to pay people unequally based on their protected characteristics, including disability. The NHS' nationally agreed pay and conditions for its workforce reduces the risk of equal pay issues arising.
- 2.4 The snapshot date that this DPG data report is based on is 31 March 2024.
- 2.5 'Mean' is the sum of the values divided by the number of values. A mean (average) involves adding up all of the hourly rates and dividing the result by how many hourly rates are in the list. Mean averages are useful because they place the same value on every number they use, giving a good overall indication of the gender pay gap. However, the distribution of pay among employees is usually skewed, with the highest paid earning significantly more than the lowest paid. For this reason, very high or low hourly pay can 'dominate' and distort the figure.
- 2.5.1 Mean disability pay gap is the average difference in earnings between people with and without a disability across all employees. The total earnings of employees with a disability are added together and divided by the number of people with a disability. The total earnings of employees without a disability are added together and divided by the number of people without a disability. The mean pay gap is the difference between these two average salaries.
- 2.6 'Median' is the middle value in a sorted list of values. Calculating the median involves listing all the numbers in numerical order. It takes all the hourly rates in the sample and lines them up in order from lowest to highest. If there are an odd number of results, the median is the middle number. If there is an even number of results, the median will be the mean of the two middle numbers. Medians are useful to indicate what the 'typical' situation is as they are not affected by outliers - a few employees at the top or bottom of the range.
- 2.6.1 Median disability pay gap is the difference in the middle salary (the median) between people with and without a disability. The earnings of employees with a disability are ranked in ascending order, and the middle salary is identified (the point where half earn more, and half earn less). The same calculation is used for employees without a disability. The median pay gap is the difference between these two middle values.
- 2.7 Analysis of pay gap across specific staff bands and quartiles: Pay quartiles refer to the division of a group of employees' pay data into four equal parts. This helps to analyse and understand the distribution of wages across a workforce, highlighting patterns such as how pay is spread out and where majority of employees fall within that range. To calculate pay quartiles, the pay data of all employees is first sorted in

ascending order. The data is then divided into four equal parts, with each quartile representing a different segment of the distribution.

2.7.1 Pay quartiles are created by ranking all the relevant employees from the lowest (first quartile) to highest paid (fourth quartile) and dividing them into 4 equal parts or quartiles.

3. **BLMK ICB's Workforce by Disability**

Number of Non-Disabled Employees	349
Number of Disabled Employees	39
Number of Employees whose disability status is unknown	39
Total Number of Employees	427



3.1 The number of employees reporting a disability decreased to 39 in 2024 from 46 in 2023. In 2021, 17.7% of the population in England, or approximately 9.8 million people, were living with a disability.

Local Authority	Population	Disability Rate
Luton	218000	7.7%
Central Bedfordshire	294000	5.8%
Bedford	170000	6.6%
Milton Keynes	292000	6.9%

Source: Office for National Statistics, 2021

Organisation	Overall Workforce	Disability Declaration Rate
BLMK ICB	427	9.13%

3.2 The above percentage indicates that disabled employees are representative of the local population as of 31 March 2024.

4 BLMK ICB's Mean and Median Disability Pay Gap Data

Disability	Mean Hourly Rate	Median Hourly Rate
Disabled	£34.22	£23.52
Non-disabled	£33.51	£51.09
Not Declared	£59.29	£29.33
Difference	£0.71	-£5.81
Pay Gap %	2%	-19.80%

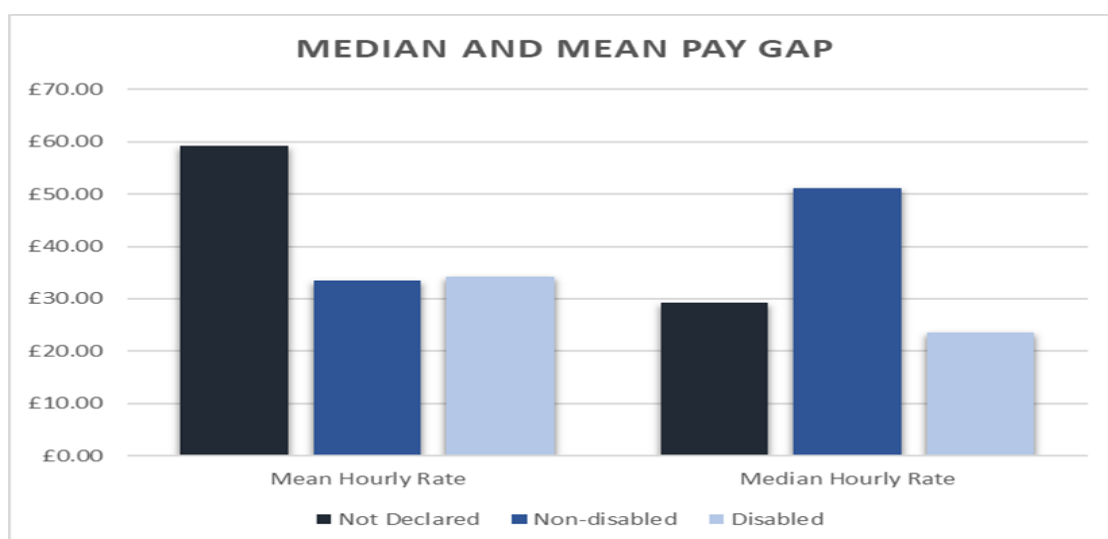
4.1 The above table shows a comparison of the hourly pay rates of employees based on their disability status, focusing on both the mean and median hourly rates for Disabled, Non-disabled and Not Declared. Additionally, the table contains the calculation of the differences in pay and the percentage pay gap for each of the rate types.

Categories	
Disabled	Includes employees who have identified as having a disability.
Non-disabled	includes employees who have identified as not having a disability.
Not Declared	represents employees who have not disclosed whether they have a disability or not.

4.2 The mean hourly rate represents the average hourly pay for each category/group. Employees who have not declared their disability status earn the highest mean hourly rate, followed by those with a disability and then those who are non-disabled. However, the mean hourly rate could be skewed by very high or low outliers.

4.3 The median hourly rate represents the middle value of hourly pay within each group, offering a better measure of central tendency that is not affected by extreme values. This shows that employees whose disability status is unknown earn a higher median rate, followed by non-disabled employees. Employees with a disability have the lowest median rate, which may suggest that employees with a disability are more likely to be concentrated in lower-paying roles compared to their non-disabled counterparts.

- 4.4 The differences reflect the distribution of pay within each category or group. The high difference for the 'Not Declared' group indicates that there may be a small number of employees earning significantly more, inflating the mean. For the 'Non-disabled' group, the negative difference suggests that the mean is lower than the median, possibly due to higher-paying outliers. The 'Disabled' group shows a relatively smaller difference, indicating a less extreme distribution of pay.
- 4.5 The mean pay gap between 'Non-disabled' and 'Disabled' employees is 2%. This shows a small difference in the average pay.
- 4.6 The median pay gap between 'Non-disabled' and "Disabled" employees is -19.80%. This negative pay gap indicates that, on average, disabled employees earn 19.80% less than their non-disabled counterparts when considering the median hourly rate.
- 4.7 The data highlights that while the mean hourly rate shows a small pay gap of 2% in favour of non-disabled employees, the median hourly rate reveals a much larger disparity of - (minus) 19.80%, suggesting that while there are some high-earning disabled employees, the overall distribution of pay for disabled employees tends to be lower than that of non-disabled employees. This disparity is particularly evident in the median values, indicating that employees with a disability are more likely to be in lower-paying roles, underscoring the need to address these pay disparities to promote greater equity in the workforce.

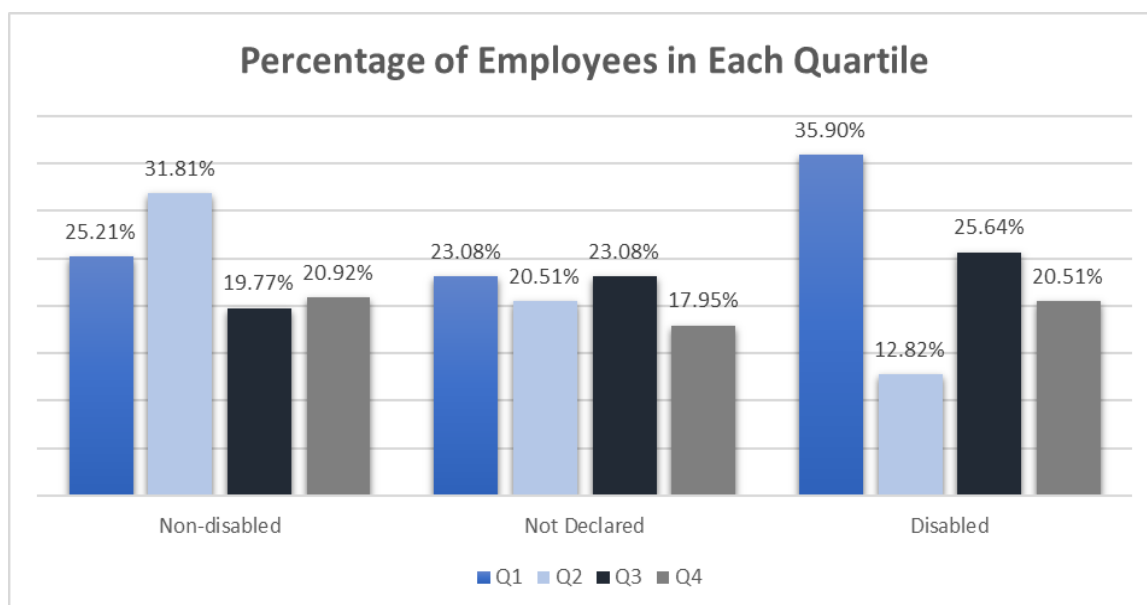


5 BLMK ICB's Workforce: Disability Profiles by Pay Band and Quartiles

Pay Band	Non-disabled	%	Not Declared	%	Disabled	%
Band 2	-	100.00%	0	0.00%	0	0.00%
Band 3	-	100.00%	0	0.00%	0	0.00%
Band 4	21	84.00%	-	12.00%	-	4.00%
Band 5	22	91.67%	0	0.00%	-	8.33%
Band 6	47	79.66%	-	1.69%	11	18.64%
Band 7	43	81.13%	-	7.55%	6	11.32%
Band 8A	65	90.28%	-	4.17%	-	5.56%
Band 8B	49	84.48%	-	5.17%	6	10.34%
Band 8C	38	100.00%	0	0.00%	0	0.00%
Band 8D	11	68.75%	-	6.25%	-	25.00%
Band 9	9	81.82%	-	9.09%	-	9.09%
Other*	41	60%	23	33.82%	-	5.88%
Total	349	81.73%	39	9.13%	39	9.13%

(* Other categories consist of: 114|MQ00|Local, 148|MGBM|Local 148 MG, 148|MQ00|Local MQ, 148|WQ00|Local WQ, 465|CQ00|Ad Hoc Grade, 465|MQ00|Local 465 MQ00, NHS|YC72|Consultant (post 31 Oct), Unspecified)

- 5.1 This report provides a comparative analysis of the pay scale distribution for Disabled, Non-Disabled and Not Declared employees. The data is segmented across various pay bands and classifications, showing the proportions of employees allocated to each category.
- 5.2 From the analysis, some key trends emerge: disabled employees have minimal representation across most pay scales, with notable exceptions in Band 6 (18.64%), Band 7 (11.32%), Band 8d (25%), and Band 9 (9.09%). Non-disabled employees, as expected, occupy the largest share of most pay scales, representing the largest proportion of the ICB's workforce. Employees who have not declared their disability status appear in much smaller proportions, typically filling less than 10% of the categories, except in some higher bands and specific classifications which is represented by 'Other' category.



5.3 The above chart presents an analysis of the distribution of Non-Disabled, Not Declared, and Disabled staff across four pay quartiles: Q1, Q2, Q3, and Q4, where Q1 corresponds to the lowest pay and Q4 to the highest. The data highlights the percentage representation of each group within these quartiles, providing insights into the allocation of staff across various pay levels.

5.4 Disabled staff has the highest representation in the first quartile, particularly at the lower pay range (35.90%). It decreases in the higher quartiles, with the second quartile showing the least representation at 12.82%. Non-Disabled staff generally maintains a steady representation across all quartiles, with its highest share in Q2 (31.81%). Staff with Not Declared status has a more balanced distribution across the four quartiles.

5.5 Hourly Rates

Disability	Q1		Q2		Q3		Q4	
Disabled	£21.80	14	£23.52	5	£35.04	10	£306.85	8
Non-Disabled	£21.79	88	29.33	111	36.01	69	260	73
Not Declared	£26.06	9	£51.09	8	£65.00	9	£260.00	7

5.5.1 The quartile hourly rate indicates that the highest hourly rate within that quartile, for example, Q1 is £21.80 and Q2 is £23.52, meaning that the highest hourly rate in quartile 2 is £23.52 but the rates in that quartile can range from £21.81 upwards.

6 Conclusion and Next Steps

- 6.1 Concerted efforts are needed to close or narrow the disability pay gap and increase the workforce's disability declaration rates at all levels of the workforce via ESR to build an accurate picture of the ICB's workforce demographics, identify areas of underrepresentation and put measures in place to secure improvements.
- 6.2 As with the gender pay gap and ethnicity pay gap data, targeted interventions aimed at closing the disability pay gap would be considered as part of the ICB's organisational development as well as equality, diversity and inclusion priority areas of focus such as inclusive recruitment, leadership and talent development. Job advertisements would carry positive action statement as deemed to be appropriate. Flexible working and agile/hybrid working, where appropriate, would be publicised as part of recruitment campaigns, particularly for higher banded/senior and other relevant posts. Reasonable adjustments that support employees with a disability would be periodically publicised through appropriate communications channels.
- 6.3 The ICB would also endeavour to benchmark the data to understand how the organisation is doing compared to other neighbouring ICBs and/or ICBs of a similar workforce size. Benchmarked DPG data would be available as and when other organisations publish their DPG data.