

# Disability Pay Gap Report 2026

(based on data extract as of 31 March 2025)

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## 1. Introduction

- 1.1 NHS Bedfordshire Luton and Milton Keynes Integrated Care Board (BLMK ICB) serve a local population of over one million people 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 access, experience and outcomes; enhance productivity and value for money; and help the NHS support broader social and economic development.
- 1.2 This Disability Pay Gap (DPG) report has been produced voluntarily with reference to the government's guidance on [Voluntary Reporting on Disability, Mental Health and Wellbeing](#), however the July 2024's King Speech indicates that a draft Equality (Race and Disability) Bill, once enacted, will:
- enshrine in law the full right to equal pay for people from ethnic minority backgrounds and with a disability; and
  - introduce statutory ethnicity pay gap reporting and disability pay gap reporting for organisations with more than 250 employees.
- 1.3 We are proactive in understanding our workforce demographics and commitment to inclusion, including but not limited to the [NHS Long-Term Workforce Plan](#) that emphasises the need for a diverse and inclusive workforce to meet the needs of diverse patients and communities and [NHS Equality, Diversity and Inclusion Improvement Plan](#)'s High Impact Action 3: to "develop and implement an improvement plan to eliminate pay gaps".
- 1.4 This report is based on data extracted from the Employee Staff Record (ESR) as of 31 March 2025 - the snapshot date, with the ICB's 2023-24 DPG data referenced for comparison. We intend to use our DPG data to monitor workforce diversity, determine if inequalities exist and inform decision-making on actions to address any inequality.

## 2. Definitions and Scope

- 2.1 Under the [Equality Act 2010](#), disability is defined as 'a physical or mental impairment that has a substantial adverse effect on a person's ability to carry out normal daily activities. This impairment, visible or hidden, could be cognitive, developmental, intellectual, mental, physical, sensory or a combination of multiple factors.
- 2.2 Pay gap is the difference in the average pay between two groups.
- 2.2.1 Pay gap differs from 'equal pay'. By law, people performing equal work or work of equal value must receive equal pay, and it is unlawful to pay people unequally

based on their protected characteristics, including disability. Nationally agreed pay and conditions for the NHS workforce reduces the risk of equal pay issues arising.

2.2.2 Disability Pay Gap measures the difference in the average pay between employees with a disability and without disability in an organisation's workforce irrespective of role.

2.3 'Mean' or average is the sum of the values divided by the number of values. A mean involves adding up all the hourly rates and dividing the result by how many hourly rates are in the list. Mean averages are mainly used to measure pay gap and useful because they place the same value on every number they use, giving a good overall indication of the disability 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.

2.3.1 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.

2.4 '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.

2.4.1 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.

2.5 For analysing 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 or quartiles, with each quartile representing a different segment of the distribution.

- 2.5.1 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

- 3.1 In this report, employees are grouped into three categories of disability (para 2.1):
1. 'disabled' employees have shared that they have a disability.
  2. 'non-disabled' employees have shared that they do not have a disability.
  3. 'not declared' employees have not shared whether they have a disability, making their disability status unknown.

- 3.2 As of 31 March 2025, BLMK ICB employed 395 people, a decrease from 427 as of 31 March 2024. Of these, 38 had a disability, a slight reduction from 39 as of 31 March 2024, and from 46 as of 31 March 2023.

Disability	2024-25	2023-24
Number of employees with a disability	38 (9.62%)	39 (9.13%)
Number of non-disabled employees	328 (83.04%)	349 (81.73%)
Number of employees whose disability status is unknown	29 (7.34%)	39 (9.13%)
<b>Total number of employees</b>	<b>395</b>	<b>427</b>

Source: ESR

- 3.3 The ICB's workforce by disability as of 31 March 2025 was 9.62%, lower than 11.25% of the overall local BLMK population of 1,140,903. It is also lower than 17.7% of England's population (approximately 9.8 million people) living with a disability in 2021 according to the Office of National Statistics (ONS).

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

Disability	Mean Hourly Rate		Median Hourly Rate	
	2025	2024	2025	2024
Disabled	£31.50	£34.22	£31.63	£23.52
Non-disabled	£32.73	£33.51	£31.49	£51.09
Not Declared	£41.60	£59.29	£37.31	£29.33
<b>Difference</b>	<b>£1.23</b>	<b>£0.71</b>	<b>-£0.14</b>	<b>-£5.81</b>
<b>Pay Gap %</b>	<b>3.76%</b>	<b>2%</b>	<b>-0.44%</b>	<b>-19.80%</b>

- 4.1 The analysis of hourly pay rates by employees' disability status for the current reporting period (2025) shows a mean pay gap of 3.76%, with disabled employees earning £31.50 per hour on average, compared to £32.73 for non-disabled employees. This shows a mean pay difference of £1.23 in 2025 compared with £0.71 in 2024.
- 4.1.1 The mean pay gap widened by 1.76%, with an increase to 3.76% in 2025 from 2% in 2024, indicating a growing disparity in average earnings between disabled and non-disabled employees.
- 4.2 Disabled employees' median hourly rate was £31.63, slightly higher than non-disabled employees' median hourly rate of £31.49, resulting in a median pay difference of -£0.14 and a median pay gap of -0.44%. The median pay gap narrowed significantly to -0.44% in 2025 from -19.80% in 2024, meaning that while disabled employees earned 19.80% more than non-disabled employees at the median, they earned only 0.44% more in 2025. This sharp decrease suggests a substantial shift in pay distribution, with disabled and non-disabled employees receiving more comparable median hourly rates in 2025 than in 2024.
- 4.3 Employees who did not share their disability status had significantly higher pay rates in 2025, with a mean hourly rate of £41.60 and a median hourly rate of £37.31, which may reflect a concentration of senior or specialist roles within this group and warrants further exploration to understand the underlying factors.
- 4.4 Overall, the DPG data highlights a complex picture: while the mean or average pay gap widened, the median figures indicate progress toward parity between disabled and non-disabled employees. Ongoing monitoring and targeted interventions may be required to address the structural factors contributing to the mean pay gap.

## 5 **BLMK ICB's Workforce by Disability, Pay Band and Quartiles**

- 5.1 The table below shows a comparative analysis of the pay scale distribution for disabled, non-disabled and not declared employees, with the DPG data segmented across various pay bands and classifications, showing the proportions of employees allocated to each category.
- 5.2 Disability representation is lowest in the lower pay bands, with undeclared disability status in Band 3 and only 0.25% and 0.51% respectively in Bands 4 and 5. Mid-level bands (6 and 7) show a noticeable increase, with 2.03% and 2.28% of employees with a disability. In higher bands, disability declaration rates fluctuate, peaking at 1.01% in Band 8d and dropping to 0.25% in Band 9. The 'other/non-AfC' category have the highest proportion of employees with undeclared disability status at 3.29%, indicating varied disability declaration rates.

Band	Disabled		Non-disabled		Not Declared	
	2025	2024	2025	2024	2025	2024
Band 2	-	0.00%	-	100.00% (-)	-	0.00%
Band 3	0.00%	0.00%	0.51%	100.00% (-)	0.00%	0.00%
Band 4	0.25%	4.00% (-)	4.56%	84.00% (21)	0.51%	12.00% (-)
Band 5	0.51%	8.33% (-)	5.06%	91.67% (22)	0.25%	0.00%
Band 6	2.03%	18.64% (11)	11.90%	79.66% (47)	0.25%	1.69% (-)
Band 7	2.28%	11.32% (6)	11.39%	81.13% (43)	1.01%	7.55% (-)
Band 8a	1.01%	5.56% (-)	16.96%	90.28% (65)	0.51%	4.17% (-)
Band 8b	1.27%	10.34% (6)	10.89%	84.48% (49)	0.76%	5.17% (-)
Band 8c	0.51%	0.00%	9.11%	100.00% (38)	0.25%	0.00%
Band 8d	1.01%	25.00% (-)	3.04%	68.75% (11)	0.25%	6.25% (-)
Band 9	0.25%	9.09% (-)	2.53%	81.82% (9)	0.25%	9.09% (-)
Other / Non-AfC	0.51%	5.88% (-)	7.09%	60% (41)	3.29%	33.82% (23)
<b>Total</b>	<b>9.62% (38)</b>	<b>9.13% (39)</b>	<b>83.04% (328)</b>	<b>81.73% (349)</b>	<b>7.34% (29)</b>	<b>9.13% (39)</b>

### 5.3 Quartiles

Quartile	Disabled	Non-disabled	Not Declared
Upper	2.95%	19.41%	3.93%
Upper Middle	0.98%	25.06%	1.23%
Lower Middle	3.44%	20.64%	0.98%
Lower	1.97%	15.48%	3.93%

- 5.3.1 The pay gap data reveals varied disability declaration rates across pay quartiles. In the upper quartile, 2.95% of employees have a disability, 19.41% are non-disabled and 3.93% with undeclared disability status.
- 5.3.2 The upper middle quartile has the highest proportion of non-disabled employees at 25.06%, but a notably lower disability declaration rate of just 0.98%. In contrast, the lower middle quartile shows a slightly higher disability representation at 3.44%, alongside 20.64% non-disabled and 0.98% undeclared.
- 5.3.3 The lower quartile has the lowest proportion of non-disabled employees (15.48%) and a disability declaration rate of 1.97%, with 3.93% not declaring. These figures suggest that disability representation is more prominent in the lower middle quartile, while the upper middle quartile has the least representation of disabled employees.

- 5.3.4 The consistent rate of undeclared status in the upper and lower quartiles (both at 3.93%) may indicate similar levels of hesitancy or privacy concerns around declaring a disability at both ends of the pay scale.

## 6 **Conclusion**

- 6.1 The mean disability pay gap widened to 3.76% in 2025 from 2% in 2024, indicating a need to close or narrow the average earnings between disabled and non-disabled employees. 'Mean' or average mainly used to measure pay gap.

## 7 **Next Steps**

- 7.1 Improving disability declaration rates at all levels of the ICB's workforce require ongoing concerted efforts.
- 7.2 The previous year's pay gaps' improvement action plan would be reviewed.
- 7.3 Benchmarking would be undertaken, where possible, to understand how the ICB compares with other neighbouring ICBs and/or ICBs of a similar workforce size.
- 7.4 Actions to address the areas for improvements will be affected or stalled by the changing ICB landscape, specifically the transfer of the operations of BLMK ICB alongside two other East of England ICBs (NHS Hertfordshire and West Essex ICB and NHS Cambridgeshire & Peterborough ICB) into a new legal entity, NHS Central East ICB, with effect from 1 April 2026. In effect, BLMK ICB closes down and a new ICB will open.