

# **Ethnicity Pay Gap Report 2023-24**

(based on redacted 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 Ethnicity Pay Gap data, which was extracted from the NHS' Electronic Staff Record (ESR) as of 31 March 2024.
- 1.3 Ethnicity pay gap data from the [Office for National Statistics](#) (ONS) has shown that there are wide variations in gross earnings between ethnic groups. Some ethnic minority groups earn less per hour than White British employees on average, while others earn more.
- 1.4 The ICB is voluntarily reporting on ethnicity pay gap (EPG) for transparency and to ensure continuous improvement to equity, equality, diversity, inclusion and belonging, as there is currently no mandatory or statutory reporting requirement specifically on ethnicity pay gap. That notwithstanding, the King's Speech in July 2024 cited that a Draft Equality (Race and Disability) Bill will enshrine in law the full right to equal pay for ethnic minorities and disabled people, and introduce mandatory ethnicity and disability pay reporting for organisations with more than 250 employees. It is already a statutory requirement for employers with at least 250 employees to measure and report gender pay gaps.
- 1.5 In addition to taking action to understand the ICB's ethnicity pay information, this is aligning with the [NHS Equality, Diversity, and Inclusion Improvement Plan's](#) High Impact Action 3 (HIA3): to "develop and implement an improvement plan to eliminate pay gaps". The ICB is also committed to the [NHS Long Term Workforce Plan](#), which emphasises the need for a diverse and inclusive workforce to meet the needs of diverse patients and communities.
- 1.6 EPG reporting is not only integral to both Plans (para 1.5), it also provides critical insights into the ICB's progress towards achieving equitable working conditions. Moreover, ensuring equitable pay across all ethnic groups is imperative to recruiting and retaining a diverse workforce that, in turn, is key to delivering high quality patient care.
- 1.7 The ICB's EPG results would be used to monitor diversity, ascertain whether disparities or inequities exist and inform decision-making on improvement actions to address inequities, if any.

1.8 EPG measures the difference in the average earnings between ethnic minority and White employees across an organisation's workforce irrespective of role, and this report includes the mean (average) as well as median ethnicity pay gap (para 4.4) and the number of ethnic minority and White employees in each pay quartile (para 5.1).

## 2. Context

2.1 In April 2023, the Government provided guidance on how to develop a consistent, methodological approach to ethnicity pay gap reporting that could culminate in meaningful, albeit proportionate, action.

2.2 With effect from April 2024, the ESR provided a template to NHS organisations for calculating the ethnicity pay gap.

2.3 The data referenced in this report has therefore been compiled using the Government's 2023 guidance as well as the 2024 ESR template.

2.4 Utilising the new ESR template brings BLMK ICB in line with other NHS organisations and will allow for comparisons and benchmarking.

2.5 Consequently, there are differences in how the EPG data is now collected compared with BLMK ICB's first EPG report in 2023, which was simply binary encompassing in terms of pay by the workforce's ethnic mix, i.e., between ethnic minority and White colleagues. The ethnic groups for ethnic minority as well as White colleagues have been broadened to include additional categories on the 2024 ESR template.

2.6 To this end, it is not possible to make like-for-like comparison of the ICB's 2023/24 EPG data with 2022/23's. Henceforth, the 2023/24 EPG data will therefore be the ICB's baseline data.

## 3. Definitions and Scope

3.1 'Pay gap' is the difference in the average pay between two groups.

3.2 'Ethnicity Pay Gap' measures the difference in the average pay of ethnic minority and White employees in an organisation irrespective of role. The ONS defines [Ethnicity Pay Gap](#) as 'the difference between the median hourly earnings of the reference group (White or White British) and other ethnic groups as a proportion of average hourly earnings of the reference group'. When people from ethnic minority

backgrounds are paid less, overall, than White British people, they experience a pay gap. When they are paid more, they experience a pay advantage.

- 3.3 EPG is different from ‘equal pay’. By law, people from different ethnic groups performing equal work or work of equal value must receive equal pay. It is unlawful to pay people unequally based on ethnicity. The NHS’ nationally agreed pay and conditions for its workforce reduces the risk of equal pay issues arising.
- 3.4 Ethnic pay disparities are not primarily about employees who are White and other ethnic groups being paid differently for the same job. The Equality Act 2010 made it unlawful to discriminate, directly and indirectly, against employees (and people seeking work) because of their race/ethnicity. Hence, unless there is a failure to comply with existing law, pay disparities between ethnic groups are likely to be due to other factors that are disadvantageous to employees from ethnic minority backgrounds.
- 3.5 ‘Relevant pay period’ means the pay period within which the ‘snapshot date’ falls, which for monthly-paid employees would be the month in which the date is included. The relevant pay period that is the focus of this report is 1 April 2023 to 31 March 2024, and the snapshot date is 31 March 2024.
- 3.6 Pay quartiles or quarters describe how an organisation is split into four equally sized portions of employees based on their hourly pay/earnings. They give an indication of ethnic representation at different levels of an organisation. For EPG, pay quartiles show the percentage of relevant full-time employees by ethnicity in four equal-sized groups based on their hourly pay. 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. For EPG, the percentage of ethnic minority and White employees in each of the 4 quartiles is then calculated.
- 3.7 ‘Mean’ 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 useful because they place the same value on every number they use, giving a good overall indication of the ethnicity 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.
- 3.8 ‘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 individuals at the top or bottom of the range.

#### 4. **BLMK ICB’s Ethnicity Pay Gap Data - Methodology**

4.1 All the calculations in this report relate to the relevant pay period in which the snapshot date falls, which is 31 March 2024 (para 3.5).

4.1.1 BLMK ICB has adopted the same methodology used for gender pay reporting, with some changes to account for the different datasets. This report therefore aligns with the Equality Act 2010 provisions. While gender pay gap compares two distinct groups, female and male, ethnicity recorded on ESR can fall into one of 6 broad categories:

1. White	2. Asian	3. Black
4. ‘Mixed’	5. ‘Other’ Ethnic Group	6. ‘Prefer not to Say’.

4.1.2 To calculate the mean and median differences, this report focuses on employees who have specified their ethnicity to give the most precise view of the EPG in the ICB, as employees who have recorded their ethnicity as ‘prefer not to say’ could be either White, White Other, Black, Asian, ‘Mixed’ or ‘Other’ minority ethnic.

4.1.3 For EPG calculations, the following measures are recommended by the Government to help understand aspects of differences between ethnic groups including:

- ethnicity representation at different pay levels in an organisation and across an organisation as a whole.
- differences in average pay between ethnic groups.
- levels of engagement with ethnicity questions.

4.1.4 The measures recommended are:

- percentage of each ethnic group in each hourly pay quarter.
- mean (average) ethnicity pay gap using hourly pay.
- median ethnicity pay gap using hourly pay.
- percentages of employees in different ethnic groups in BLMK ICB.
- percentage of employees who did not disclose their ethnicity - either answered ‘prefer not to say’ or provided no response.

4.1.5 In addition, the ICB have provided information on the mean and median hourly rate. This forms part of the national reporting included in ESR and provides a useful context to understanding pay within BLMK ICB. Pay band headcount percentages have also been included to help us depict the pay gap.

## 4.2 BLMK ICB Workforce

4.2.1 The ICB's workforce had 400 employees during the pay period that this EPG report covers, i.e., as of 31 March 2024, however 392 employees were categorised as "relevant employees" for the purposes of the ethnicity pay gap calculations.

## 4.3 Ethnicity

4.3.1 The proportion of BLMK ICB employees who had disclosed their ethnicity as 31 March 2024 is 96%. This is 1 per cent lower than last year at 97%.

### 4.3.2 Ethnic Groups Included in the ethnicity pay measures.

4.3.2.1 It is recognised that the group referred to as "Black, Asian and minority ethnic" is not homogeneous, and that there is the need to ensure that the EPG data analysis considers the significant differences in pay gaps between the ICB workforce from within the groups otherwise defined as Black, Asian and minority ethnic in this report.

### 4.3.3 Aggregated Groups

4.3.3.1 There are 18 ONS ethnicity categories that could be used to provide a detailed granular pay analysis, however the ICB is a relatively small organisation. The 2024 ESR template allows for EGP calculations that does not disclose person-identifiable information about individual employees, and to ensure statistical robustness, these ethnicity categories have been aggregated to the six broad groups below, including the 'prefer not to say' option:

• Asian	• Black	• 'Mixed'
• White British	• White 'Other'	• 'Other' Ethnic Group
• 'Prefer not to Say' / 'Not Stated'		

## 4.4 Mean and Median Hourly Rate

Ethnic Origin Grouping	Mean Hourly Rate	Median Hourly Rate
Asian	45.1477	29.3286
Black	27.4711	26.0571
'Mixed'	24.0787	25.5988
Not Stated	34.9268	26.0571
'Other'	28.2007	27.4982
White British	31.6180	26.0573
White Other	29.9261	23.5226

4.4.1 The group(s) that have not stated their ethnicity has a high mean hourly rate, i.e., it is not possible to understand this group in terms of ethnicity and it highlights the importance of employees declaring their equality and diversity information. The figure at 34.92 is high, suggesting these are employees in the higher pay bands. 16 employees have not declared their ethnicity, 10 of whom are in Band 8a and above.

## 5 Ethnicity Pay Gap Calculations

### 5.1 Calculation 1: Percentage of employees in different ethnic groups in each hourly pay quarter

Quartile	Asian %	Black %	Mixed %	Not Stated %	Other %	White British %	White Other %
Upper	4.34%	0.77%	0.26%	0.77%	0.26%	18.11%	1.28%
Upper Middle	3.57%	3.32%	0.51%	0.77%	0.26%	15.05%	0.51%
Lower Middle	2.55%	1.79%	0.51%	1.28%	0.51%	20.92%	1.53%
Lower	1.53%	2.55%	1.02%	0.51%	0.00%	14.54%	1.02%

### 5.2 Calculations 2 and 3: Mean (average) and Median EPG for Hourly Pay

5.2.0 The calculation for the mean and median ordinary pay includes only 'full pay relevant' employees, i.e., BLMK ICB employees on full pay in March 2024.

#### 5.2.1 Mean Calculation

5.2.1.1 The mean (average) is calculated by adding up the wages of all relevant employees and dividing the figure by the number of employees. The mean ethnicity pay gap is calculated based on the difference between mean pay of White employees and the mean pay of each of the ethnic groups.

#### 5.2.2 Median Calculation

5.2.2.1 The median is the figure that falls in the middle of a range when the wages of all relevant employees are lined up from smallest to largest. The median gap is calculated based on the difference between the employee in the middle of the range of White employees' wages and the middle employee in the range of each ethnic groups' wages.

5.2.2.2 Using the 6 aggregated groups, 12 calculations have been made, each for the mean and median pay gap.

### 5.3 Calculation 2: Mean (Average) EPG for Hourly Pay

5.3.1 The analysis below highlights the differences between the 6 ethnic groups as defined by the ONS, compared against the White ethnic group. Employees who “prefer not to say” are included in the charts below showing the ICB’s workforce composition, the mean and median hourly rate table, and the pay band headcount percentage tables. However, the ‘prefer not to say’ group is not included in the pay gap analysis below.

5.3.2 The table below shows the mean pay gap (the difference in the average hourly pay for each ethnic group compared to the White ethnic group).

- Where there is a positive percentage, this means that the average pay of a White employee is higher than that of an employee from an ethnic minority group. The higher the percentage, the greater the ethnicity pay gap.
- Where there is a negative percentage, this means that the average pay of staff within the relevant cohort is higher than the pay of White staff at the same grade.

5.3.3 The mean hourly pay gaps between each of the ethnic groups is tabulated below.

Ethnic Group	White Other	Asian	Black	Mixed	Other
White	Gap between White and White 'Other' ethnic groups 5.3512	Gap between White and Asian ethnic groups <b>-42.7912</b>	Gap between White and Black ethnic groups 13.1158	Gap between White and Mixed ethnic groups 23.8450	Gap between White and 'Other' ethnic groups 10.8080
White Other		Gap between White 'Other' and Asian ethnic Groups <b>-50.8640</b>	Gap between White 'Other' and Black ethnic groups 9.2842	Gap between White 'Other' and Mixed ethnic groups 19.5395	Gap between White 'Other' and 'Other' ethnic groups 5.7655
Asian			Gap between Asian and Black ethnic groups 39.1528	Gap between Asian and Mixed ethnic groups 46.6668	Gap between Asian and 'Other' ethnic groups 37.5368
Black				Gap between Black and Mixed ethnic groups 12.3490	Gap between Black and 'Other' ethnic groups <b>-2.6559</b>
Mixed					Gap between 'Mixed' and 'Other' ethnic groups <b>-17.1189</b>

### 5.3.4 Key Highlights from Calculation 2

- There is a mean ethnicity pay advantage between Asian ethnic groups and all other ethnic groups including White.
- There is a mean ethnicity pay gap between the White ethnicity group, and White Other, Black, 'Mixed', and Other Ethnicity groups.
- There is no mean ethnicity pay gap between the White and Asian ethnicity groups.

### 5.4 Calculation 3: Median EPG using Hourly Pay

5.4.1 The table below shows the median pay gap (the hourly pay figure that falls in the middle for each ethnic group compared to the White ethnic group).

- Where there is a positive percentage, this means that the median pay of a White employee is higher than that of an employee from an ethnic minority group. The higher the percentage, the greater the median ethnicity pay gap.
- Where there is a negative percentage, this means that the median pay of staff within the relevant cohort is higher than the median pay of White staff at the same grade.

5.4.2 The median pay gap calculation for each combination of ethnic groups being analysed.

Ethnic Group	White Other	Asian	Black	Mixed	Other
White	Gap between White and White 'Other' ethnic groups 9.7277	Gap between White and Asian ethnic groups -12.5539	Gap between White and Black ethnic groups 0.0010	Gap between White and 'Mixed' ethnic groups 1.7596	Gap between White and 'Other' ethnic groups -5.5296
White Other		Gap between White 'Other' and Asian ethnic groups -19.7964	Gap between White 'Other' and Black ethnic groups -9.7267	Gap between White 'Other' and 'Mixed' ethnic groups -8.1105	Gap between White 'Other' and 'Other' ethnic groups -14.4577
Asian			Gap between Asian and Black ethnic groups 11.1546	Gap between Asian and 'Mixed' ethnic groups 12.7173	Gap between Asian and 'Other' ethnic groups 6.2410
Black				Gap between Black and 'Mixed' ethnic groups	Gap between Black and 'Other' ethnic groups

				1.7588	-5.2407
Mixed					Gap between 'Mixed' and 'Other' ethnic groups  -6.9073

### 5.4.3 Key Highlights from Calculation 3

- There is a median ethnicity pay advantage between Asian ethnic groups and all the other ethnic groups including White. This group have a high hourly rate with a large proportion of this group employed at Band 8a and above.
- There is a median ethnicity pay gap between the White ethnicity group, and White Other, Black, and 'Mixed', groups.
- There is no median ethnicity pay gap between the White and Asian and White and 'Other' ethnicity groups.
- The White 'Other' group is small with 17 employees. This group have a low median hourly rate at 23.52 and are employed in the lower bands. This results in a median pay gap where all other groups have a pay advantage against the White 'Other' group.

## 5.5 Calculation 4: Representation of Ethnic Groups in BLMK ICB

5.5.1 In the ICB, the representation of Black and Minority Ethnic (BME) employees is 24%; slightly short of the local population of BME communities, which averages at 27.3% across the ICS (ONS census data 2021 - 70.7% White British, 16.4% Asian, 6.9% Black, 'Other' ethnic group 2%, 'Mixed' or multiple ethnic group 4%). However, there is a large variation across the population of the 4 boroughs covered by the ICB:

Bedford Borough: 22.5% BME	Bedford Central: 8.9% BME
Luton: 51.4% BME	Milton Keynes: 26.2% BME
<b>Averages at 27.3% across the ICS</b>	

## 5.6 Ethnicity of BLMK ICB's Workforce by Pay Band as of 31 March 2024

5.6.1 The ICB's workforce had 400 employees during the pay period that this EPG report covers, with only 392 included in the EPG data (para 4.2.1). The table below shows the number of employees in each pay group of the NHS Agenda for Change (AfC) and other/non-AfC):

Band	White	%	White Other	%	Asian	%	Black	%	Mixed	%	Other	%	Prefer not to say	%
Band 2	-	0.50%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Band 3	-	0.25%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Band 4	15	3.75%	-	0.75%	0	0.00%	-	0.50%	-	0.50%	0	0.00%	-	0.25%
Band 5	14	3.50%	0	0.00%	5	1.25%	-	0.75%	-	0.50%	0	0.00%	0	0.00%
Band 6	41	10.25%	-	0.50%	-	0.75%	9	2.25%	0	0.00%	-	0.25%	-	0.75%
Band 7	39	9.75%	-	1.00%	-	1.00%	-	0.50%	-	0.25%	-	0.25%	-	0.50%
Band 8a	47	11.75%	-	0.75%	15	3.75%	-	0.75%	-	0.50%	0	0.00%	-	0.50%
Band 8b	41	10.25%	0	0.00%	-	1.00%	9	2.25%	-	0.25%	-	0.50%	-	0.25%
Band 8c	31	7.75%	-	0.25%	-	0.25%	-	0.75%	-	0.25%	-	0.25%	0	0.00%
Band 8d	14	3.50%	-	0.25%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	-	0.25%
Band 9	9	2.25%	-	0.25%	-	0.25%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other/ Non-AfC	17	4.25%	-	0.50%	16	4.00%	-	0.50%	0	0.00%	0	0.00%	6	1.50%
<b>Total</b>	<b>271</b>	<b>67.75%</b>	<b>17</b>	<b>4.25%</b>	<b>49</b>	<b>12.25%</b>	<b>33</b>	<b>8.25%</b>	<b>9</b>	<b>2.25%</b>	<b>5</b>	<b>1.25%</b>	<b>16</b>	<b>4.00%</b>

5.6.2 Some data in this report has been redacted due to low numbers. Where the numbers of employees for a category are below five, this has been redacted to ensure anonymity and that individual employees cannot be easily identified. The numbers that are less than 5 are represented by the symbol '-', which does not mean that these are zeros or zero numbers, rather that they are less than 5. Where there is no count at all, the number, zero, would be shown.

## 5.7 Calculation 5: Percentage of Employees whose Ethnicity is 'Prefer not to Say'

5.7.1 The percentage of employees whose ethnicity is 'prefer not to say' is 4% and is included in the above table. The majority of those who 'prefer not to say' are Band 8a and above. This impacts and skews parts of the data and presents a slight misrepresentation at the upper quartiles and higher pay bands making it difficult to gain a full picture of the ethnicity pay gap.

## 6 BLMK ICB's Ethnicity Pay Gap Data

### 6.1 White

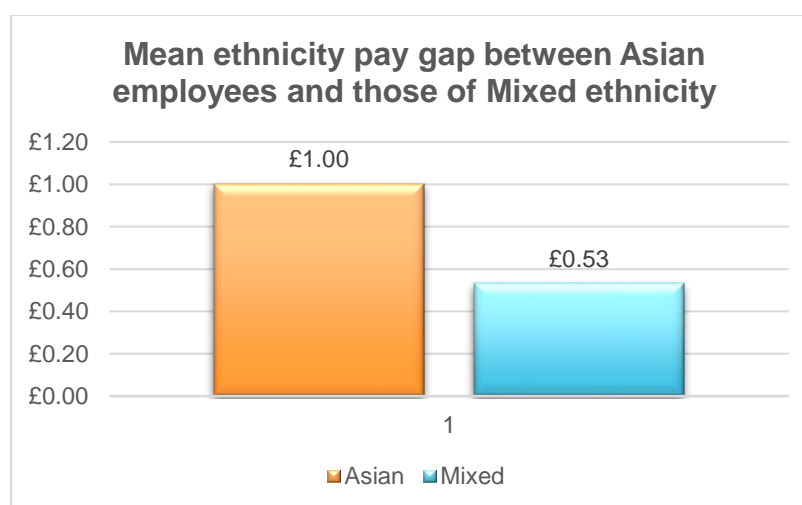
- There is a pay advantage between White and Asian employees, with a mean ethnicity pay advantage of 42.79%. This means that on average for every £1 that an Asian employee earns a White employee earns 57p.
- There is a mean (average) pay gap between the White ethnic group and all the remaining ethnic groups; Black, 'Mixed', and other ethnicities.
- The biggest mean ethnicity pay gap for this group is between White employees and those of mixed ethnicity with a mean ethnicity pay gap of 23.85%. This

means that on average for every £1 that a White employee earns, a 'Mixed' employee earns 76p.



## 6.2 Asian

- The mean (average) pay is highest for the Asian ethnic group.
- There is a pay advantage between the Asian and White ethnic groups.
- There is a mean (average) pay gap between the Asian ethnic group and the White, White Other, Black, 'Mixed', and 'Other' ethnic groups.
- The biggest mean ethnicity pay gap is between Asian employees and those of 'Mixed' ethnicity, with a mean ethnicity pay gap of 46.66%. This means that on average for every £1 that an Asian employee earns, a 'Mixed' employee earns 53p.



### 6.3 Black

- The Black staff group experience a pay gap in all areas, except between Black and 'Other' ethnic groups where there is a slight pay advantage of 2.6%. This means that for every £1 a Black employee earns, an employee from 'Other' ethnic group earns 97.5p.
- The pay gap between Asian and Black employees is 39.15%. This means that, on average, for every £1 that an Asian employee earns, a Black employee earns 61p.



- The pay gap between White and Black employees is 13.11%. This means that, on average, for every £1 that a White employee earns, a Black employee earns 87p.



### 6.4 'Mixed'

- The 'Mixed' staff group experience a pay gap in all areas except between 'Mixed' and 'Other' ethnic groups where there is a pay advantage of 17.11%. This

means that for every £1 a 'Mixed' employee earns, an employee from 'Other' ethnic group earns 83p.

- The biggest mean ethnicity pay gap is between Asian employees and those of 'Mixed' ethnicity, with a mean ethnicity pay gap of 46.66%. This means that, on average, for every £1 that an Asian employee earns, a 'Mixed' employee earns 53p.
- The second biggest mean ethnicity pay gap is between White and 'Mixed' employees, with a mean ethnicity pay gap of 23.84%. This means that, on average, for every £1 that a White employee earns, a 'Mixed' employee earns 76p.
- The mean ethnicity pay gap between Black and 'Mixed' staff groups is 12.34%. This means that, on average, for every £1 that a Black employee earns, a 'Mixed' employee earns 88p.

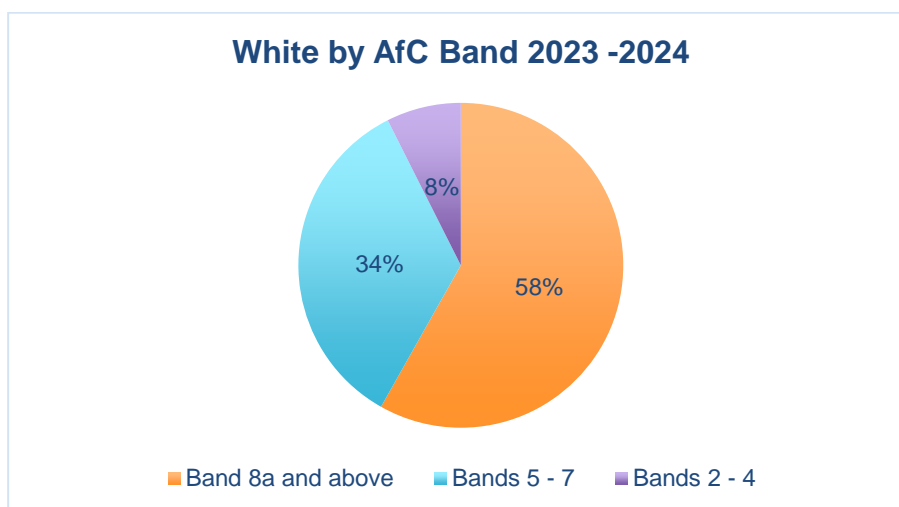


### 6.5 'Other' Ethnic Group

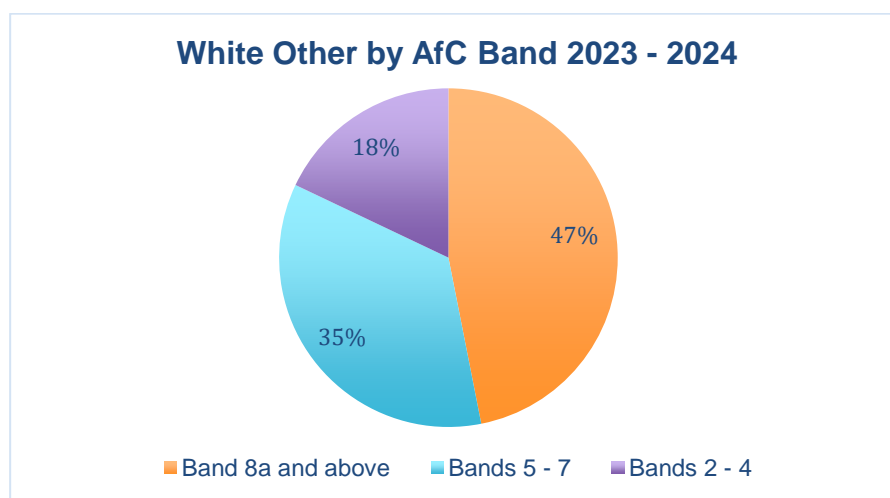
- This group experiences a mean pay gap in all areas. It is a small group consisting of 5 employees.

### 6.6 Pay Band Headcount Percentage

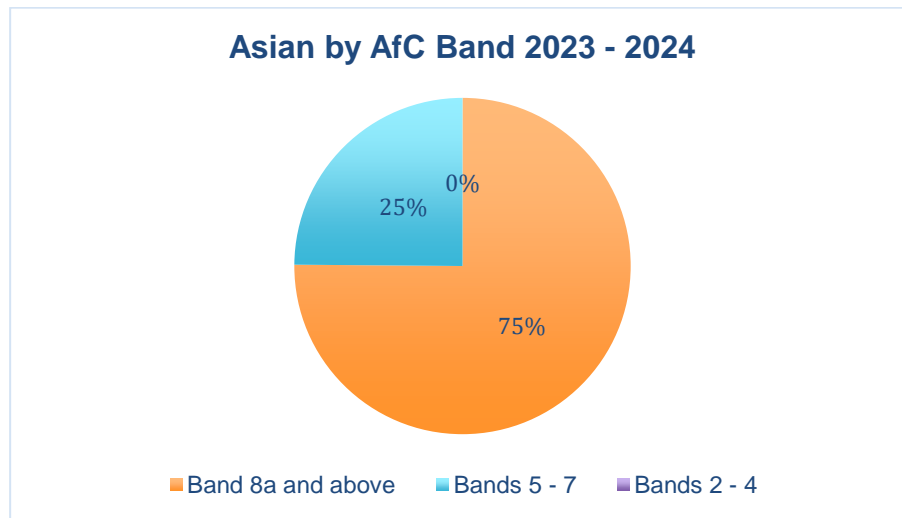
- The pay gap is depicted through the pay band headcount percentage tabulated above.



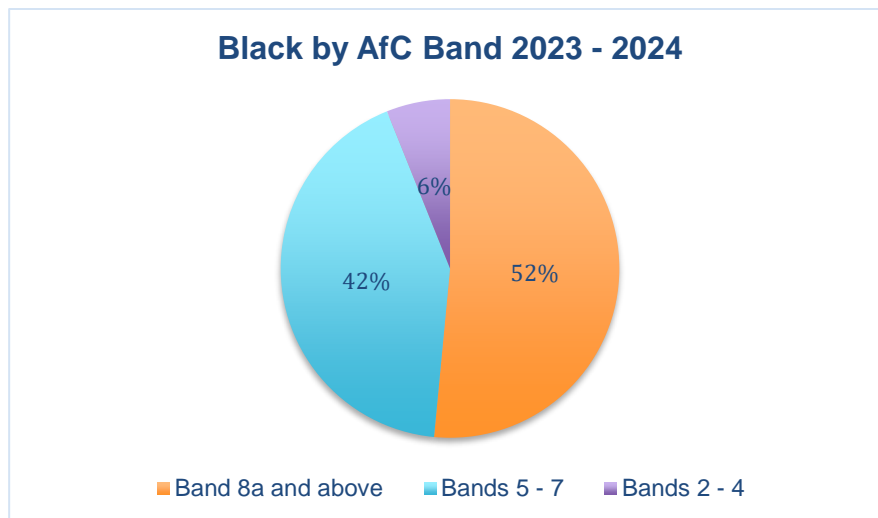
- The White ethnic group makes up 67.75% of the ICB’s workforce and the majority (58%) of the White ethnic group are at AfC Band 8a and above. Only a small percentage (8%) are Bands 2-4.



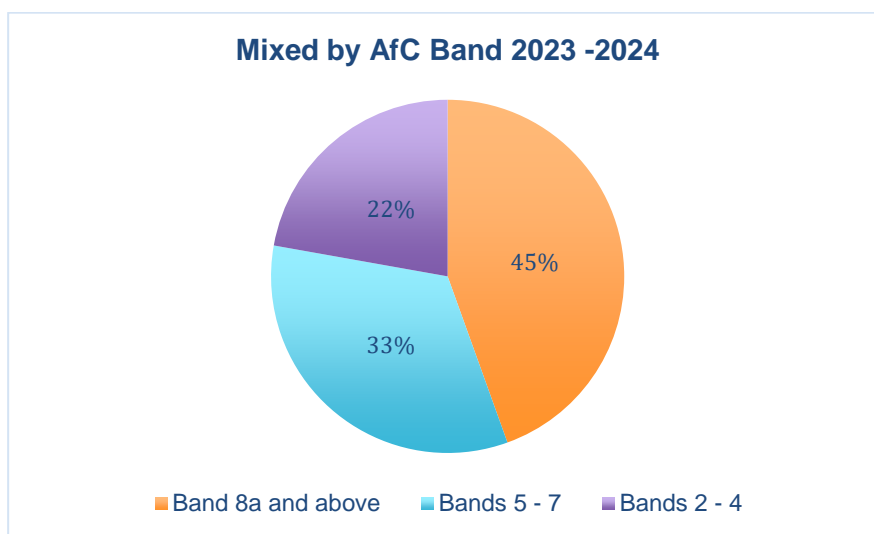
- White ‘Other’ employees are spread across Bands 5-7 (35%) and Band 8a and above (47%) and a significant percentage (18%) are Band 2-4.



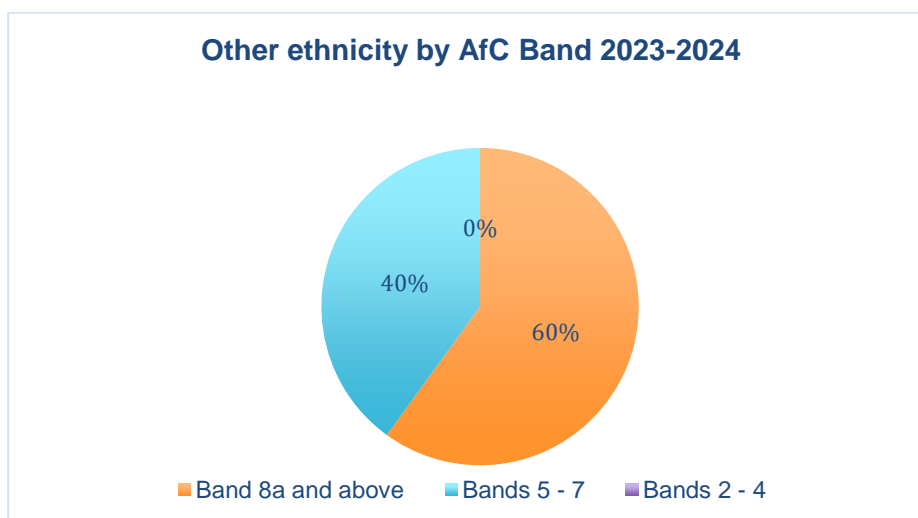
- The second largest ethnic group is the Asian ethnic group who make up 12.25% of our workforce. 75% of Asian employees are at AfC Band 8a and above. By contrast, there are no Asian employees at Bands 2-4.



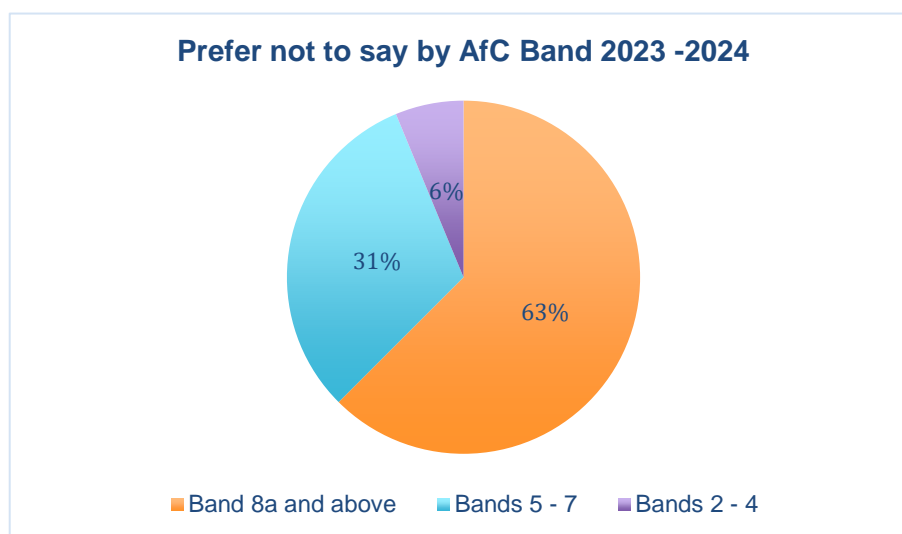
- The Black ethnic group are spread across Bands 5-7 (42%) and Band 8a and above (52%). Only a small percentage (6%) are Bands 2- 4.



- The ethnic group with the most staff at Bands 2-4 is 'Mixed' at 22%. The 'Mixed' ethnic group consists of 6 employees.



- The majority (60%) of the 'Other' ethnicity group are at AfC Band 8a and above, and there are no employees at Bands 2-4.



- The ‘prefer not to say’ group have 63% at bands 8a and above. This group comprises 16 employees and having this gap in ethnicity data impacts on the overall understanding of the ethnicity pay gap in the ICB.

6.7 It might be useful, in future, to break down the data further into clinical and non-clinical roles, however as the ICB has a relatively small workforce, this might lead to very low numbers that do not contain enough information to derive statistical conclusions.

## 7. Conclusion

7.1 The ICB’s ethnicity pay gap is driven through having a higher representation of employees from White ethnic groups and some ethnic minority backgrounds at higher grades, notably Asian employees. The pay gap is also driven by the ICB’s higher representation of employees from some ethnic minority backgrounds in junior/lower banded roles, particularly those from ‘Mixed’ and ‘Other’ ethnic minority backgrounds, relative to the overall BLMK ICB population. In addition, the ICB have lower ethnic minority representation at senior levels, particularly Black, Mixed and Other ethnicities.

7.2 Concerted efforts are needed to close the ethnicity pay gap by addressing the imbalance highlighted through supporting the development and progression of ethnic minority colleagues from Black, ‘Mixed’ and other ethnicities, and through a continued focus on ensuring that BLMK ICB is an attractive place to work and progress for ethnic minority talent.

## 8. Next Steps

- 8.1 The ICB would endeavour to benchmark this pay period's EPG data after March 2025 to understand how the organisation is doing compared to other neighbouring ICBs and/or ICBs of a similar workforce size. This is because they might not yet have published their EPG data. Benchmarked EPG data for the 2023/24 pay period would be available if other organisations publish their results.
- 8.2 Targeted interventions aimed at closing the ethnicity 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, etc.
- 8.3 There would be ongoing monitoring to check for any racial bias in recruitment information and selection processes, including negotiation of salaries on appointment. Job advertisements would carry positive action statements about underrepresentation of ethnic minority employees in higher banded/senior roles.
- 8.4 Opportunities that support the career progression, promotion and leadership development of colleagues from ethnic minority backgrounds would be encouraged, for example through the appraisal process. This would be to ensure that there is equitable access to and uptake of non-mandatory training and development opportunities.
- 8.5 There would be campaigns to increase improve the ethnicity declaration rates of employees, particularly colleagues at higher bands.
- 8.6 Monitoring of racial bias in the applications of employment policies and procedures, such as flexible working, needs to be undertaken.
- 8.7 Appropriate responses must be formulated to any behavioural concerns raised through feedback mechanisms such as the Staff Survey, Freedom to Speak Up Guardian/Ambassadors, exit interviews, etc.
- 8.8 An action plan is to be developed to incorporate the NHS EDI Improvement Plan's HIA3 (para 1.5). NHS organisations are required to:
  - implement the 'Mend the Gap' review recommendations for medical staff and develop a plan to apply those recommendations to senior non-medical workforce (March 2024).
  - analyse data to understand pay gaps by protected characteristic and put in place an improvement plan. This will be tracked and monitored by NHS

boards. Reflecting the maturity of current data sets, plans should be in place for gender and race, disability by 2025 and other protected characteristics by 2026.

- implement an effective flexible working policy, including advertising flexible working options on organisations' recruitment campaigns

8.9 BLMK ICB employees, particularly those from some of the ethnic minority backgrounds, would be engaged to inform the work required to address the ethnicity pay gap.