



**Bedfordshire, Luton
and Milton Keynes**
Integrated Care Board

Ethnicity 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 Ethnicity Pay Gap (EPG) report has been produced voluntarily, 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:
- the 2024 Employee Staff Record (ESR) template provided to NHS organisations for EPG calculations with ethnic groupings for ethnic minority and White employees broadened to include additional categories.
 - data extracted from the ESR as of 31 March 2025 - the snapshot date, with the ICB's 2023-24 EPG data referenced for comparison.
 - data compiled using the Government's 2023 guidance on how to develop a consistent, methodological approach to EPG reporting that could culminate in meaningful action.
- 1.5 Ethnicity pay gap data from the [Office for National Statistics](#) (ONS) shows that there disability groups earn less per hour than White British employees on average, while others earn more.
- 1.6 We intend to use our EPG 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 Pay gap is the difference in the average pay between two groups.

2.1.1 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 ethnicity. Nationally agreed pay and conditions for the NHS workforce reduces the risk of equal pay issues arising.

2.1.2 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.

2.2 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.

2.2.1 '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 a 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.

2.2.2 Mean ethnicity pay gap measures the difference in the average earnings between the reference group (White or White British) and other ethnic groups of employees across an organisation irrespective of role. Mean EPG is the average difference in earnings between the reference group and other ethnic groups across all employees. Total earnings of the reference group and other ethnic groups of employees are added together and divided by the number of people. The total earnings of the reference group are added together and divided by the number of people from other ethnic groups. The mean pay gap is the difference between these two average salaries.

- 2.2.3 '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.
- 2.2.4 Median ethnicity pay gap is the difference in the middle salary (the median) between the reference group and other ethnic groups. The reference group's earnings 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 from other ethnic groups. The median pay gap is the difference between these two middle values.
- 2.3 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.
- 2.3.1 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.
- 2.4 '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 2024 to 31 March 2025, and the snapshot date is 31 March 2025.
3. **BLMK ICB Workforce by Ethnicity**
- 3.1 As of 31 March 2025, BLMK ICB employed 395 people, a decrease from 427 as of 31 March 2024. The proportion of employees who had shared their ethnicity as of 31 March 2025 is 96.71%, almost 1% lower than 97% in 2024.

3.1.1 The proportion of employees who shared their ethnicity as of 31 March 2025 was 96.71% - almost 1 percent higher than the previous reporting year, i.e., as of 31 March 2024, at 96% and similar as of 31 March 2023 at 97%.

3.2 Ethnic Groups included in the ethnicity pay measures

3.2.1 There is recognition that the group referred to as “Black, Asian and minority ethnic” is not homogeneous, hence the need to ensure that the EPG data analysis considers the significant differences in pay gaps within the ethnic groups described as Black, Asian and minority ethnic in this report.

3.3 Aggregated Groups

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:

1. White British
2. White ‘Other
3. Asian
4. Black
5. Mixed
6. Other Ethnic Group
7. Prefer not to say

4. BLMK ICB’s Ethnicity Pay Gap - Methodology

4.1 All the calculations in this report relate to the relevant pay period in which the snapshot date falls, 31 March 2025.

4.2 The 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 six broad categories:

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

- 4.3 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.
- 4.4 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.
- 4.5 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.
- 4.6 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.

4.7 Mean and Median Hourly Rates

Ethnic Origin Grouping	Mean Hourly Rate		Median Hourly Rate	
	2025	2024	2025	2024
White British	£33.4183	31.6180	£28.8718	26.0573
White Other	£31.3152	29.9261	£25.9116	23.5226
Asian	£39.2273	45.1477	£30.9424	29.3286
Black	£29.8198	27.4711	£27.4905	26.0571
Mixed	£28.4739	24.0787	£27.0068	25.5988
Other	£32.7391	28.2007	£37.2312	27.4982
Not Stated	£32.6534	34.9268	£22.9938	26.0571

- 4.7.1 In the 2025 ethnicity pay gap analysis, the Asian ethnic group continued to have the highest mean hourly rate at £39.23, despite a decrease of £5.92 from the previous year. The Black ethnic group saw a modest increase in both mean and median hourly rates, with the mean rising by £2.35 and the median by £1.43. The Mixed ethnic group experienced a notable increase in mean hourly rate of £4.40, and a median increase of £1.41.

4.7.2 The Other ethnic group had the largest increase in median hourly rate, rising by £9.73 to £37.23. Conversely, the Not Stated group saw a decline in both mean and median hourly rates, with the median falling by £3.06, the largest decrease among all groups. The White British and White Other groups showed moderate increases in both mean and median hourly rates.

4.7.3 Overall, the data indicates a general upward trend in pay across most ethnic groups, with some disparities still evident in both mean and median earnings.

5. Ethnicity Pay Gap Calculations

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

Quartile	White British		White Other		Asian		Black		Mixed		Other		Not Stated	
	2025	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025	2024
Upper	18.64%	18.11%	0.76%	1.28%	4.79%	4.34%	1.51%	0.77%	0.25%	0.26%	0.25%	0.26%	0.50%	0.77%
Upper Middle	19.14%	15.05%	0.50%	0.51%	4.53%	3.57%	2.27%	3.32%	0.76%	0.51%	0.25%	0.26%	0.50%	0.77%
Lower Middle	17.88%	20.92%	1.26%	1.53%	2.52%	2.55%	2.27%	1.79%	0.25%	0.51%	0.25%	0.51%	1.26%	1.28%
Lower	11.34%	14.54%	0.50%	1.02%	2.77%	1.53%	3.02%	2.55%	1.01%	1.02%	0.00%	0.00%	1.01%	0.51%

5.1.1 The above table presents the percentage distribution of various ethnic groups across four pay quartiles, Upper, Upper Middle, Lower Middle and Lower in the workforce.

5.1.2 **Upper Quartile:** The White British group has the highest representation at 18.64%, followed by Asian at 4.79%. Representation of Black, Mixed, Other, and White Other groups is below 2%, with Black at 1.51% and others ranging from 0.25% to 0.76%. Not Stated accounts for 0.50%.

5.1.3 **Upper Middle Quartile:** White British remains the most represented group at 19.14%, slightly higher than in the Upper Quartile. Asian representation is similar at 4.53%, while Black increases to 2.27%. Mixed, Not Stated, Other, and White Other all hover around 0.25% to 0.76%.

5.1.4 **Lower Middle Quartile:** White British representation slightly decreases to 17.88%. Asian drops to 2.52%, while Black remains at 2.27%.

5.1.5 **Lower Quartile:** Black representation increases to 3.02%, the highest across all quartiles. Asian is at 2.77% and Mixed at 1.01%.

5.1.6 White British employees consistently hold the highest representation across all quartiles, especially in the upper bands. Black representation increases in the lower quartiles, suggesting a potential disparity in pay band distribution. Mixed, Other, and

White Other groups show relatively low representation across all quartiles. The Lower Quartile shows the highest representation for the Black group, indicating a concentration in lower pay bands.

5.2 Calculation 2: Mean (Average) EPG for Hourly Pay

5.2.1 Mean Calculation

5.2.1.1 The mean (average) EPG 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 the difference between the average pay of different ethnic groups. The pay analysis reveals significant disparities between ethnic groups:

5.2.1.2 Mixed employees earn substantially less than all other groups, with a pay gap of 16.92% compared to White colleagues.

5.2.1.3 In contrast, Asian employees have the highest average pay, earning 16.94% more than White employees and an even greater 40.76% more than Mixed employees.

5.2.1.4 Black employees are paid 6.14% less than White employees but 12.97% more than Mixed employees, while those in the 'Other' ethnic category earn 3.74% less than White employees but 15.87% more than Mixed employees.

5.2.1.5 When comparing Asian employees to others, Black employees are paid 19.74% less and 'Other' ethnic groups 17.68% less.

5.2.1.6 Finally, 'Other' employees are paid 2.56% more than Black employees.

5.2.1.7 Overall, the data highlights that Mixed employees experience the largest pay disadvantage, while Asian employees have the highest relative earnings.

Ethnic Group	Mixed	Asian	Black	Other
White	<p>Gap between white and mixed ethnic groups</p> <p>'Mixed' employees are paid 16.92% less than white employees, which means that for every £1 a White employee earns, a 'Mixed' employee will earn 83p.</p>	<p>Gap between white and Asian ethnic groups</p> <p>Asian employees are paid 16.94% more than white employees, which means that for every £1 an Asian employee earns, a White employee will earn 83p.</p>	<p>Gap between white and black ethnic groups</p> <p>Black employees are paid 6.14% less than white employees, which means that for every £1 an White employee earns, a Black employee will earn 94p.</p>	<p>Gap between white and Other ethnic groups</p> <p>'Other' employees are paid 3.74% less than white employees which means that for every £1 a White employee earns, an 'Other' employee will earn 96p.</p>
Mixed		<p>Gap between mixed and Asian ethnic groups</p> <p>Asian employees are paid 40.76% more than 'Mixed' employees, which means that for every £1 an Asian employee earns, a 'Mixed' employee will earn 59p.</p>	<p>Gap between mixed and black ethnic groups</p> <p>Black employees are paid 12.97% more than 'Mixed' employees, which means that for every £1 a Black employee earns, a 'Mixed' employee will earn 87p.</p>	<p>Gap between mixed and other ethnic groups</p> <p>'Other' employees are paid 15.87% more than 'Mixed' employees, which means that for every £1 an 'Other' employee earns, a 'Mixed' employee will earn 84p.</p>
Asian			<p>Gap between Asian and black ethnic groups</p> <p>Black employees are paid 19.74% less than Asian employees, which means that for every £1 an Asian employee earns, a Black employee will earn 80p.</p>	<p>Gap between Asian and other ethnic groups</p> <p>'Other' employees are paid 17.68% less than Asian employees, which means that for every £1 an Asian employee earns, an 'Other' employee will earn 82p.</p>
Black				<p>Gap between black and other ethnic groups</p> <p>'Other' employees are paid 2.56% more than Black employees, which means that for every £1 an 'Other' employee earns, a Black employee will earn 97p.</p>

5.3 Calculation 3: Median EPG for Hourly Pay

- 5.3.1 The median refers to the value positioned at the centre of a set when all employees' wages are arranged from lowest to highest. The median gap is determined by comparing the middle employee's wage in each ethnic group.
- 5.3.2 The median pay gap analysis reveals significant disparities across ethnic groups. Employees identifying as 'Mixed' ethnicity face the largest disadvantage, earning

20.93% less than their White counterparts. In contrast, Asian employees earn 7.17% more than White employees, while those from 'Other' ethnic backgrounds earn 5.61% more. Black employees earn 4.79% less than White employees. When comparing ethnicities directly, Asian employees earn 35.53% more than 'Mixed' employees, and 'Other' employees earn 33.57% more than 'Mixed' employees. These figures highlight a persistent and concerning gap, particularly for 'Mixed' ethnicity staff, and underscore the need for targeted action to address pay equity across all groups.

Ethnic Group	Mixed	Asian	Black	Other
White	<p>Gap between White and Mixed ethnic groups</p> <p>'Mixed' employees are paid 20.93% less than White employees, which means that for every £1 a White employee earns, a 'Mixed' employee will earn 79p.</p>	<p>Gap between White and Asian ethnic groups</p> <p>Asian employees are paid 7.17% more than White employees, which means that for every £1 an Asian employee earns, a White employee will earn 93p.</p>	<p>Gap between White and Black ethnic groups</p> <p>Black employees are paid 4.79% less than White employees, which means that for every £1 a White employee earns, a Black employee will earn 95p.</p>	<p>Gap between White and Other ethnic groups</p> <p>'Other' employees are paid 5.61% more than White employees, which means that for every £1 and 'Other' employee earns, a White employee will earn 94p.</p>
Mixed		<p>Gap between Mixed and Asian ethnic groups</p> <p>Asian employees are paid 35.53% more than 'Mixed' employees, which means that for every £1 an Asian employee earns, a 'Mixed' employee will earn 64p.</p>	<p>Gap between Mixed and Black ethnic groups</p> <p>Black employees are paid 20.41% more than 'Mixed' employees, which means that for every £1 a Black employee earns, a 'Mixed' employee will earn 80p.</p>	<p>Gap between Mixed and Other ethnic groups</p> <p>'Other' employees are paid 33.57% more than 'Mixed' employees, which means that for every £1 an 'Other' employee earns, a 'Mixed' employee will earn 66p.</p>
Asian			<p>Gap between Asian and Black ethnic groups</p> <p>Black employees are paid 11.15% less than Asian employees, which means that for every £1 an Asian employee earns, a Black employee will earn 89p.</p>	<p>Gap between Asian and Other ethnic groups</p> <p>'Other' employees are paid 1.45% less than Asian employees, which means that for every £1 an Asian employee earns, an 'Other' employee will earn 99p.</p>
Black				<p>Gap between Black and Other ethnic groups</p> <p>'Other' employees are paid 10.92% more than Black employees, which means that for every £1 an 'Other' employee earns, a Black employee will earn 89p.</p>

5.4 Calculation 4: Representation of Ethnic Groups in BLMK ICB

5.4.0 In the ICB, the representation of Black and Minority Ethnic (BME) employees is 26.62%; slightly short of the local BME population, 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 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
Averages at 27.3% across the ICS	

5.4.1 Ethnicity of BLMK ICB's Workforce by Pay Band as of 31 March 2025

5.4.1.1 The table below shows the percentage of employees in each AfC and other/non-AfC pay group.

Band	White British	White Other	Asian	Black	Mixed	Other	Prefer not to say
Band 3	0.25%	0.00%	0.25%	0.00%	0.00%	0.00%	0.00%
Band 4	4.30%	0.25%	0.00%	0.51%	0.25%	0.00%	0.00%
Band 5	3.80%	0.00%	1.01%	0.25%	0.76%	0.00%	0.00%
Band 6	7.85%	0.25%	1.27%	3.04%	0.00%	0.25%	1.52%
Band 7	10.63%	1.27%	1.77%	0.25%	0.25%	0.00%	0.51%
Band 8a	12.15%	0.51%	3.54%	1.52%	0.51%	0.00%	0.25%
Band 8b	9.11%	0.00%	1.77%	1.52%	0.25%	0.00%	0.25%
Band 8c	8.10%	0.25%	0.51%	0.51%	0.00%	0.51%	0.00%
Band 8d	3.80%	0.25%	0.00%	0.25%	0.00%	0.00%	0.00%
Band 9	2.78%	0.00%	0.00%	0.25%	0.00%	0.00%	0.00%
Other/ Non-AfC	4.56%	0.25%	4.30%	0.76%	0.25%	0.00%	0.76%
Total	67.34%	3.04%	14.43%	8.86%	2.28%	0.76%	3.29%

5.4.2 The ethnic diversity across pay bands shows a predominance of White British employees particularly in Bands 6 to 8a where representation peaks at 12.15% in Band 8a. Asian employees have a notable presence in Bands 6 and 8c. Black employees are mostly visible in Band 6 (3.04%), while Mixed employees are sparsely represented across all bands, peaking at 0.76% in Band 5. The 'Other' category remains consistently low, with a slight increase in Band 8c (0.51%). The proportion of employees who prefer not to share their ethnicity is highest in Band 6 (1.52%).

5.4.3 Overall, the workforce is predominantly White British at 67.34%, with Asian 14.43% and Black 8.86% employees forming the next largest ethnic groups, indicating some diversity but with clear disparities in representation across seniority levels.

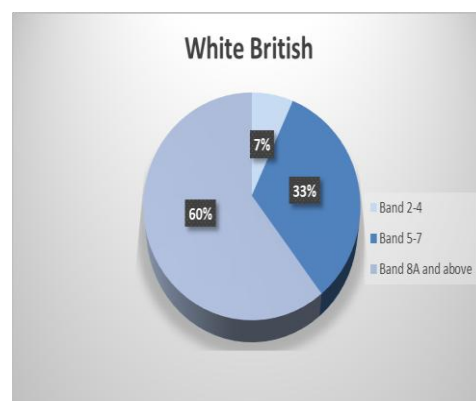
5.5 Calculation 5: Percentage of Employees whose Ethnicity is ‘Prefer not to Say’

5.5.1 The percentage of employees whose ethnicity is ‘prefer not to say’ is 3.29% and is included in the above table. The majority of those who ‘prefer not to say’ are Bands 6-8a and non-AfC employees. 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 by Ethnic Groups

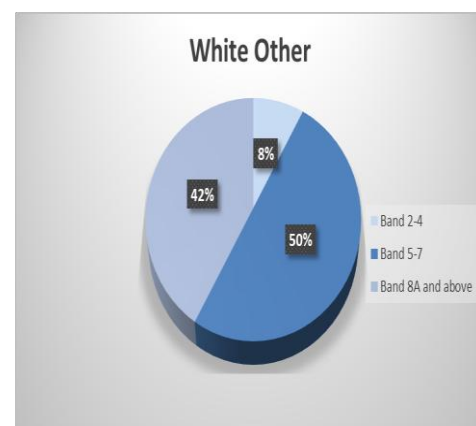
6.1 White British

White-British employees make up 67% of the ICB’s workforce. Only a small percentage, 7%, are in Bands 2-4, which typically represent entry-level or support roles. A larger portion, 33%, are in Bands 5-7, indicating mid-level professional or supervisory positions. The majority, 60%, are in Band 8A and above, suggesting strong representation in senior or leadership roles. This distribution highlights a significant presence of White British individuals in higher pay bands.



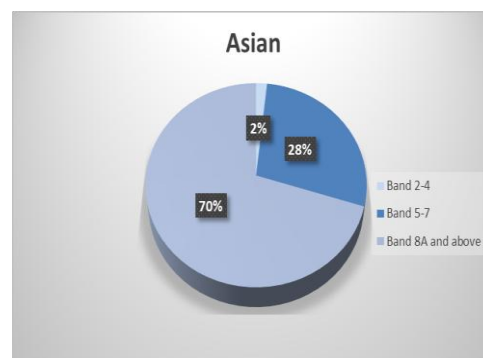
6.2 White Other

White Other employees reveals a workforce distribution where half fall within Bands 5–7, suggesting a strong presence in mid-level roles. A substantial 42% are positioned in Band 8A and above, indicating notable representation in senior or leadership roles. In contrast, only 8% are in Bands 2-4. There’s been a clear shift compared to last year, when most White Other staff (47%) were in Band 8A and above, while 35% held roles in Band 5-7, and a higher proportion (18%) were in entry-level positions within Bands 2-4.



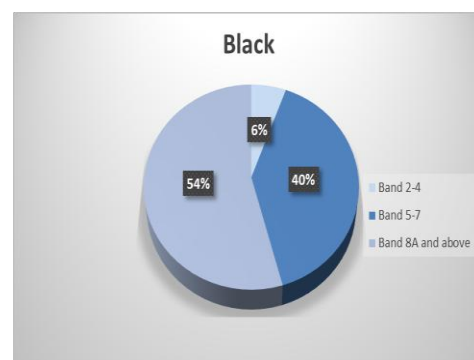
6.3 Asian

Asian employees are the second largest ethnic group, making up 14% of the workforce, with only 2% in Bands 2-4, 28% in Bands 5-7 and the majority (70%) in Band 8A and above, reflecting strong representation in senior or leadership roles. This distribution indicates that Asian employees are predominantly concentrated in higher pay bands.



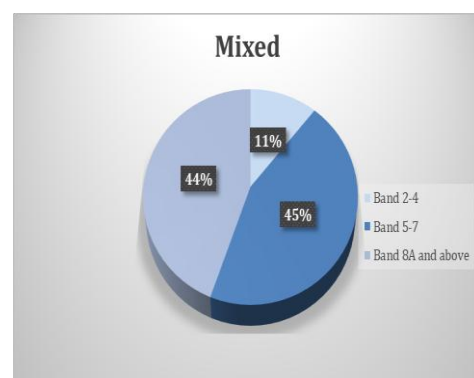
6.4 Black

Black employees are spread across Band 5-7 (40%) and Band 8A and above (54%), only a small proportion of the group are Band 2-4 (6%).



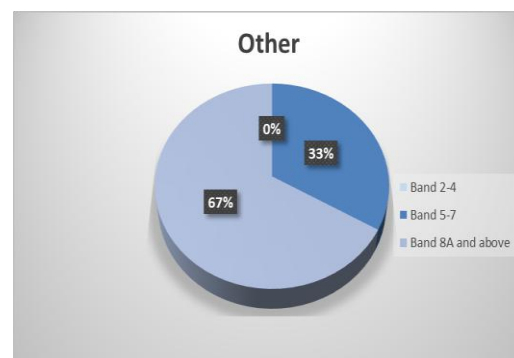
6.5 'Mixed'

Mixed employees make up a relatively small segment of the organisation, with their representation primarily concentrated in Band 5–7 roles at 45% and Band 8A and above at 44%. Notably, their presence in entry-level roles has dropped from 22% last year to just 11%, while their share in Band 5–7 has risen from 33% to 45%, marking a significant upward shift in senior roles.



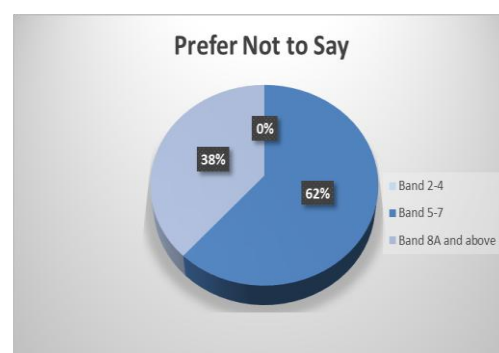
6.6 Other Ethnic Group

The representation of the 'Other' ethnic group in senior roles has grown by 7% this year. Although this group accounts for a small portion of the overall workforce, they are predominantly found in Band 8A and above positions. Their presence in mid-level roles stands at 33%, indicating a continued concentration in higher pay bands with limited distribution across lower bands.



6.7 Prefer not to say Ethnic Group

Employees who prefer not to share their ethnicity are predominantly in Band 5-7 roles, making up 62% of this group. Notably, their presence in entry-level Bands 2-4 has dropped from 6% last year to none this year. Additionally, while they were mostly represented in senior roles last year at 63%, this figure has declined to 38%, indicating a marked shift in their distribution across pay bands.



7. Conclusion

7.1 The ICB's 2024-25 ethnicity pay gap analysis reveals both progress and persistent disparities in pay and representation across ethnic groups. While the overall trend shows an increase in mean and median hourly rates for most groups, significant gaps remain, particularly for staff from Mixed ethnic backgrounds who continue to experience the largest pay disadvantage compared to their White and Asian counterparts. Conversely, Asian employees have the highest average earnings, with a notable concentration in senior roles, while Black and Other ethnic groups also show some improvement in pay and representation in higher bands.

7.2 White British employees remain the majority within the workforce and are strongly represented in senior positions, however there is evidence of positive movement for other ethnic groups such as the increased presence of the 'Other' ethnic group in

higher pay bands and the upward shift of employees in the Mixed ethnicity group into mid-level and senior roles. However, the underrepresentation of some ethnic groups in entry-level and mid-level roles, and the continued pay gap for certain ethnic minority groups highlight the need for ongoing targeted action.

- 7.3 The findings underscore the importance of sustained efforts to address structural barriers, the need to promote equitable progression and ensure that pay and opportunities are fairly distributed across all ethnic groups.

8. **Next Steps**

- 8.1 Improving ethnicity declaration rates at all levels of the ICB's workforce require ongoing concerted efforts.
- 8.2 The previous year's pay gaps' improvement action plan would be reviewed.
- 8.3 Benchmarking would be undertaken, where possible, to understand how the ICB compares with other neighbouring ICBs and/or ICBs of a similar workforce size.
- 8.4 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.