



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

Gender 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 Gender Pay Gap (GPG) report has been produced as required under the [Equality Act 2010 \(Specific Duties and Public Authorities\) Regulations 2017](#) that came into force on 31 March 2017, and made it a statutory requirement for public sector employers with 250 employees or more to measure and publish on their website their GPG data annually by 30 March on all employees who are employed under a contract of employment, a contract of apprenticeship or a contract to personally undertake work. This includes employees under the NHS' Agenda for Change (AfC) terms and conditions, Medical and Dental Conditions as well as Very Senior Manager (VSM)'s pay conditions.
- 1.3 We are also 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 reference to the ICB's 2024-25 GPG data for comparison. We intend to use our GPG data to monitor workforce diversity, check whether disparities exist and inform improvement actions to address inequalities, if any.

2. Gender Pay Gap Reporting Requirements

- 2.1 The ICB's GPG data must be published within one year of the 2025 snapshot date, with the publishing deadline of 30 March 2026 for data extract as of 31 March 2025.
- 2.2 It must be published on a publicly accessible website to employees and members of the public free of charge. These should remain on the website for a period of at least three years beginning with the date of publication. Moreover, employers have the option to provide narratives that will help people to understand why there is a gender pay gap and what the organisation intends to do to close it.

- 2.3 In addition to publishing the GPG report on the employer's website, they are required to annually upload their GPG results to the Government Equality Office's Online Reporting Service via www.gov.uk/genderpaygap. Employers will have registered on the Government's website in their first reporting year.
- 2.4 GPG report must include:
- percentage of females and males in each hourly pay quarter
 - mean (average) gender pay gap using hourly pay
 - median gender pay gap using hourly pay
 - percentages of employees in each hourly pay group by gender
- 2.5 There are two additional measures that do not apply to BLMK ICB as bonus is not paid and there is no data on this to report. These are:
- mean bonus gender pay gap
 - median bonus gender pay gap
3. **Definitions and Scope**
- 3.1 'Pay gap' is the difference in the average pay between two groups.
- 3.1.1 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 gender. Nationally agreed pay and conditions for the NHS workforce reduces the risk of equal pay issues arising.
- 3.2 Gender Pay Gap measures the difference in the average pay of male and female in an organisation's workforce irrespective of role.
- 3.3 'Mean' is the sum of the values divided by the number of values. A mean (average) 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 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.
- 3.4 '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 individuals at the top or bottom of the range.

- 3.5 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 female and male representation at different levels of an organisation. For GPG, pay quartiles show the percentage of relevant full-time employees by gender, i.e., female and male, in four equal-sized groups based on their hourly pay.
- 3.5.1 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. For GPG, the percentage of males and females in each of the 4 quartiles is then calculated.
- 3.6 '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.
- 3.6.1 The relevant pay period that this report focuses on is 1 April 2024 - 31 March 2025, with the snapshot date, 31 March 2025.
- 3.7 Bonus pay relates to performance, productivity, incentive, commission or profit-sharing, but excludes:
- remuneration referable to overtime
 - remuneration referable to redundancy
 - remuneration referable to termination of employment.

4. **Gender Pay Gap Calculations**

- 4.0 The calculations in this report are for the relevant pay period in which the snapshot date falls and based on the Government Equalities Office's methodology for measuring mean and median gender pay gap across pay quartiles.
- 4.1 **Calculation 1: Percentage of Females and Males in each Hourly Pay Quartile**
- 4.1.1 Pay quarters show the percentage of full-time female and male relevant employees in four equal sized groups based on their hourly pay. The pay quartiles are created by ranking each full-time employee in order from lowest earning (first quartile) to highest earning (fourth quartile). Pay quarters give an indication of women's representation at different levels of the organisation.
- 4.1.2 In each of the ICB's pay quartile in 2024-25 as tabulated below, females made up:
- 66.36% of the upper hourly pay quartile (highest paid jobs) - a decrease of over 2% compared to last year.
 - 82.88% of the upper middle hourly pay quartile - a 2.2% decrease year-on-year.
 - 86.29% of the lower middle hourly pay quartile - a 1.5% increase since last year.

- 85.06% of the lower hourly pay quartile (lowest paid jobs) - a 1.35% decrease from the previous year.

Quartile	Female	Male
Upper	66.36%	33.64%
Upper Middle	85.11%	14.89%
Lower Middle	85.96%	14.04%
Lower	83.13%	16.87%

4.1.3 If the pay quartiles were representative of the ICB workforce’s gender composition, each quartile would be approximately 80% female and 20% male. However, the data shows that female representation in the upper quartile is significantly lower than 80% at 66.36%, while the male representation in the upper quartile is significantly higher than 20% at 33.64%.

4.2 Calculation 2: Mean (Average) Gender Pay Gap for Hourly Rate

4.2.1 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 gender pay gap is calculated based on the difference between mean male pay and mean female pay.

4.2.2 As of 31 March 2025, the mean difference between female and male’s hourly pay narrowed by 2.41% to 22.07% compared with 24.48% as of 31 March 2024. The GPG analysis reveals that the mean hourly rate for females is £31.69, compared to £40.66 for males, resulting in a mean gender pay gap of 22.07%, meaning that, using mean, women are paid 22.07% less than men and for every £1 a man earns, a woman earns 78p.

Gender	Mean (Average) Hourly Rate	
	2024-25	2023-24
Female	£31.69	£40.76
Male	£40.66	£30.78
Difference	£8.97	£9.98
Mean Gender Pay Gap %	22.07%	24.48%

4.3 Calculation 3: Median Gender Pay Gap for Hourly Rate

4.3.1 The median is the figure that falls in the middle of a range when the wages of all relevant employees are lined up from the smallest to largest. The median gap is calculated based on the difference between the employee in the middle of the range of males’ pay and the middle employee in the range of female.

Gender	Median Hourly Rate	
	2024-25	2023-24
Female	£28.87	£26.05
Male	£33.88	£32.71
Difference	£5.01	£6.66
Median Gender Pay Gap %	14.78%	20.34%

4.3.2 The median hourly rate stands at £28.87 for females and £33.88 for males, equating to a median gender pay gap of 14.78%, compared to 20.34% in 2024. This means that, based on median values, women are paid 14.78% less than men and for every £1 a man earns, a woman earns 85p.

4.3.3 In comparison to 2024's mean gender pay gap of 24.68% and the median gender pay gap was 13.60%, this year shows a slight improvement in the mean pay gap, indicating a narrowing of the average earnings disparity. However, the median pay gap has increased, suggesting that the typical earnings difference between men and women has grown slightly.

4.3.4 This shift highlights nuanced changes in pay equity, where progress at the higher end of the pay scale may not be mirrored across the broader workforce.

4.4 Calculation 4: Percentage of BLMK ICB's Employees in each Hourly Pay Group by Gender

4.4.1 The ICB uses the NHS' AfC grading structure ranging from Bands 2 to 9 and Very Senior Managers (VSM). The ICB The table below shows the percentage of employees in each pay band.

Band	Female (%)	Male (%)	Total (%)
AfC Band 3	0.00%	0.51%	0.51%
AfC Band 4	5.06%	0.25%	5.32%
AfC Band 5	5.06%	0.76%	5.82%
AfC Band 6	13.42%	0.76%	14.18%
AfC Band 7	12.15%	2.53%	14.68%
AfC Band 8a	15.44%	3.04%	18.48%
AfC Band 8b	9.87%	3.04%	12.91%
AfC Band 8c	7.34%	2.53%	9.87%
AfC Band 8d	3.54%	0.76%	4.30%
AfC Band 9	2.28%	0.76%	3.04%
Other / Non-AfC	6.08%	4.81%	10.89%
Total	80.25%	19.75%	100.00%

- 4.4.2 The gender distribution across pay bands continues to reflect a predominantly female workforce, with women comprising 80.25% of the overall workforce as of 31 March 2025, which is virtually unchanged from 79.75% as of 31 March 2024 and indicates a stable gender composition overall. Notable shifts are observed within specific bands, for instance, female representation decreased in Band 8a to 15.44% as of 31 March 2025 from 19.44% as of 31 March 2024 and decreased to 9.87% from 14.73% in Band 8b.
- 4.4.3 Male representation remains significantly lower across all bands, with the highest proportion in the Other/Non-AfC category, which increased from 3.60% in the previous year to 4.81% in the current year. Interestingly, Band 3 shows a small male presence (0.51%) but no female representation. Women continue to be over-represented in more junior grades, where pay is lower, and under-represented in more senior grades. These year-on-year comparisons highlight areas of stability and subtle shifts, offering a useful lens through which to assess progress and identify opportunities for further gender balance, particularly in senior and entry-level roles.

5 Conclusion

- 5.1 The ICB's 2024-25 GPG analysis highlights both progress and ongoing challenges. While the overall workforce remains predominantly female, women continue to be underrepresented in the highest pay quartile and senior grades, which contributes to a mean gender pay gap of 22.07% and a median gap of 14.78%. Although there has been a slight improvement in the mean gender pay gap compared to 2024, the median gap has widened, indicating that pay equity progress is not uniform across all levels. These findings underscore the importance of sustained efforts to promote gender balance, particularly in senior roles and to ensure that talent is maximised and rewarded fairly throughout the organisation.
- 5.2 **Progress since 2021-22:** Between 2021 and 2025, the gender distribution across AfC bands reveals contrasting trends for women and men. In the senior pay band (Band 8a and above), the proportion of women increased steadily from 52.5% to 55.52%, indicating a positive shift towards greater female representation in leadership roles. In contrast, male representation in the same band showed volatility - dropping from 74.3% to 65.4% before rising sharply to 75.64% in 2024-25. This recent spike suggests a resurgence in male appointments or retention at senior levels, potentially offsetting earlier gains in gender balance.
- 5.2.1 In the mid-level Bands 5-7, female representation remained relatively stable, with a slight decline from 39.4% to 38.17%. Male representation, however, fluctuated more significantly, rising from 21.4% to 28.4% in 2022-23 before falling back to 20.51% in 2024-25. This suggests that while women maintained a consistent presence, men experienced more variable movement in and out of these roles.

5.2.2 At the lower Bands 2-4, both genders saw a decline. Female representation dropped from 8.1% to 6.31%, and male representation decreased from 4.3% to 3.85%, following a brief increase in 2022–23. This downward trend may reflect a reduction in lower-band roles or successful progression of staff into higher bands. Overall, the data highlights a gradual upward mobility for women, particularly in senior roles, while male representation has been more erratic, especially at the top.

5.3 **Comparison with other ICBs:** In the 2023-24 reporting year, BLMK ICB’s mean gender pay gap was 24.5% and median gender pay gap was 20.3%, indicating a significant disparity in average earnings between male and female employees. Compared to other regional ICBs in the period, the ICB’s GPG figures stand out as notably higher. For instance, North-West London ICB reported a much lower mean gap of 9.3% and a median of 8.9%, suggesting more equitable pay practices. Cambridge and Peterborough ICB had a mean gap of 20.6% and a median of 9.7%, while Hertfordshire and West Essex ICB showed a mean gap of 20.16% but a significantly lower median of just 2.93%. These comparisons highlight that while some ICBs are making strides toward pay equity, BLMK ICB still faces challenges in closing the gender pay gap, particularly in terms of average earnings across its workforce.

ICB	2023-24	
	Mean (%)	Median (%)
BLMK	24.5%	20.3%
NW London	9.3%	8.9%
C&P	20.60%	9.70%
HWE	20.16%	2.93%

6 Next Steps

- 6.1 The previous year’s pay gaps’ improvement action plan would be reviewed.
- 6.2 Benchmarking would be undertaken, where possible, to understand how the ICB compares with other neighbouring ICBs and/or ICBs of a similar workforce size.
- 6.3 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.