

NHS Frimley

Gender Pay Gap

Update
January 2025



Gender Pay Gap – context

Legal Context: The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 require public sector organisations employing 250 staff and over to publish their Gender Pay Gap Report by end of March annually, providing ‘snapshot data’ for 31 March of the previous year. This is part of our Public Sector Equality Duty.

This report has been prepared in accordance with guidance published by the Government Equalities Office and the ‘snapshot’ information includes staff holding an employment contract on 31 March 2024, based on our Employee Staff Records (ESR).

Why is Gender Pay Gap reporting important? Gender pay gap reporting highlights differences in the average (mean or median) earnings of men and women - expressed as a percentage of men’s earnings. For example, women earn 15% less than men.

How does it help? It helps to understand equality gaps at the workplace, female and male participation at different levels and if talent is maximised and rewarded fairly and effectively. Gender Pay Gap reporting promotes accountability and transparency and informs actions to minimise equality gaps.

How is Gender Pay Gap different from Equal Pay: Equal pay deals with pay differences between men and women carrying out same jobs, similar jobs or work of equal value. Failure to ensure equal pay for roles of equal value between men and women is unlawful.

Gender Pay Gap reporting shows the average hourly pay differences between men and women and whether any one gender is disproportionately over-represented at a particular salary band. Individual component calculations (mean, median, bonus and by pay quarter) help identify what is causing the difference and inform action plans to minimise the gaps.

Data from the Kings Fund in 2024 shows that three-quarters (74%) of NHS England staff are female and 31% are from an ethnic minority background – higher than the population average in England; but disability rates among staff in NHS England are 7%, which is below the England average. These rates vary by role; for example, the proportion of female staff ranges from nearly 100% of midwives to 46% of doctors. In Frimley ICB, 75% of staff are female (1% higher than the national rate of 74%).



Gender Pay Gap – Requirements of the organisation

A yearly update report must be reported and published within a year of the snapshot date of 31st March. It is against the law to fail to report our gender pay gap data by the deadline.

The update must also be published on our website and should be kept online for 3 years. Our employees should be told where to find the information.

Alongside the report, best practice from the Government Equalities Office suggests including the following:

- A supporting narrative to help people to understand why we think we have a gender pay gap and what action we have taken to analyse and close it. The narrative could include:
 - a more detailed analysis of our gender pay gap, and explanations for each of the figures in our report
 - information about what we have already done to close our gap
 - reasons why some actions may take a while to affect our gap
 - workforce statistics, to give a clearer picture of why our gap exists
- An action plan

This report has been prepared in accordance with guidance published by the Government Equalities Office and the 'snapshot' information includes staff holding an employment contract on 31 March 2024, based on our Employee Staff Records (ESR).



Our commitment to EDI



NHS Frimley is committed to and actively promotes a fair and inclusive environment where everyone feels valued and respected. Our aim is to create a workplace where every individual has a sense of belonging and is empowered to reach their full potential. We recognise that diversity is our strength, and inclusion is essential to achieving our mission of providing high-quality healthcare and addressing health inequalities. We work closely with our strategic partners to promote equality of access and treatment and by addressing health inequalities, we ensure that all individuals receive the care and support they need. Throughout 2024/25, as an Integrated Care System, we have introduced several anti-racism commitments with our partners.

Our Commitment to EDI:

- We strive to create an environment where everyone, including patients, visitors and community members feel welcomed and included.
- We celebrate the diverse backgrounds and perspectives of our people and communities
- We aim to empower everyone to achieve their best, recognising that each person's contribution is essential to our success.
- Ensuring that all members of our community have equal access to healthcare services.
- Promoting fair treatment in all aspects of our work.
- Actively working to reduce inequalities in health

Our EDI ambition is to:

- Ensure staff fully understand equality and diversity issues
- Make staff feel empowered to challenge prejudice and make reasonable adjustments in their own work areas
- Include equality and diversity training for all staff
- Ensure all staff promote the cultural and behavioural changes to ensure equality and diversity is demonstrated in all aspects of NHS Frimley's work
- We are currently setting our objectives for 2025-2027. This process includes reviewing our latest workforce data and collaborating with staff across the Integrated Care Board.



The Remuneration Committee (RemCom) reviewed the Gender Pay Gap report in March 2024. Feedback included the need for a refined EDI action plan with clear milestones, details of staff networks to be added and a lead named Executive Sponsor within the ICB. Work continues in Q4 to provide further assurance to RemCom.

The ICB has undergone a significant change programme and ensuing restructure which has impacted progress on streams of work including this one. The areas we have prioritised and focussed on are shown on slide 7

During 2023/2024;

- On 1st July 2023, 50 staff members (39 Pharmacy, Ophthalmic and Dentistry and 11 Complaints) TUPE transferred from NHSE to Frimley ICB under a host arrangement
- On 1st February 2024 Frimley ICB in housed 25 staff members of staff from South, Central and West Commissioning Support Unit from Commissioning Performance (Contracting) and Financial Services departments

The organisational change programme has seen a change in the ICB Directorates formation and structure.



During the organisation change programme

To ensure we positively promoted gender equality through our organisational change process:

- The original consultation report was reviewed through an inclusion lens, to support use of inclusive language and to highlight the ICS ambition to improve workforce and health inequalities.
- Inclusion messages were embedded into the 'managing change sessions' that were delivered to line managers and drew out key equality themes from the post-consultation responses to ensure they were amplified.
- Created a consistent template to ensure that job descriptions for new roles were developed with inclusivity and accessibility in mind including inclusive language that did not have a negative impact on women.
- Completed ongoing Equality & Health Inequality Assessments (EHIAAs), ensuring that at each decision-making point, anonymised ESR data was reviewed and any impact on gender equality was highlighted including through an intersectional lens
- Job matching and potential job interview processes were reviewed from an equality perspective – constantly asking whether we are doing enough to ensure that people will feel equally and fairly treated and that their needs will be considered.
- Equality Advocates were recruited, trained and formed part of the interview panels to challenge any bias decisions.



Work undertaken and in progress

- Frimley ICB, has signed up to the Sexual Safety in Healthcare Charter and has dedicated resource to meet the requirements under the 10 commitments.
- We have actively ensured that women were not adversely affected within the organisational change programme through ongoing EHAs and analysis of workforce data at each stage.
- Inclusive approaches have been developed within the recruitment process including the inclusive recruitment toolkit. We continue to ensure these practices are embedded and will further upskill our line managers.
- A System-wide Women's network commenced in March 2024 and will be relaunched in conjunction with International Women's day on 8th March 2025.
- Benchmarking against regional data has been reviewed, and actions will form part of the action plan.
- The following policies have been launched which all support women in the workplace
 - Flexible Working
 - Working Carers
 - Pregnancy and Baby Loss



Comparison of data

31/03/23 against 31/04/24

Metric	2023		2024		
Headcount	339 25% men (78) 75% women (261)		438 25% men (111) 75% women (327)		Increased numbers due to intake of NHSE and SCW staff * ref slide 6 for details
Median hourly rate	£34 per hour – men £26 per hour - women		£36 per hour – men £27 per hour - women		Women have consistently earned 25% lower- 75p for every £1 that men earned
Mean hourly rate	£39 per hour – men £31 per hour – women		£41 per hour – men £32 per hour – women		Women have consistently earned 20% lower; men had a 5% mean increase, while women had a 3.2% increase from 2023 to 2024
Quartiles (1 being lowest paid) Percentage of women	4	65.9%	4	61.8%	As at 31/03/23 women were over-represented in the lower pay quartiles (1st and 2nd) and men were over-represented in the 4 th . As at 31/03/24 the position had improved in the 2nd but declined in the others
	3	75.8%	3	72.5%	
	2	85.0%	2	80.1%	
	1	82.7%	1	83.5%	



Gender by quartile

The Proportion of men and women in each pay quartile (%) is calculated by ranking all employees from highest to lowest paid, dividing the workforce into four numerically equal parts ('quartiles') and working out the percentage of men and women in each of the four parts. (The lowest paid jobs are in quartile one).

31/03/2023				
Quartile	Female	Male	Female %	Male %
4 Upper	56	29	65.88	34.12
3 Upper middle	75	24	75.76	24.24
2 Lower middle	68	12	85.00	15.00
1 Lower	62	13	82.67	17.33

31/03/2024				
Quartile	Female	Male	Female %	Male %
4 Upper	91	18	61.82	38.18
3 Upper middle	89	21	72.48	27.52
2 Lower middle	79	30	80.91	19.09
1 Lower	68	42	83.49	16.51

Gender by AFC pay grade

31/03/2023				
Band	Female	Male	Female %	Male %
2	1	0	100%	0%
3	2	1	67%	33%
4	12	3	80%	20%
5	26	5	84%	16%
6	38	6	86%	14%
7	48	13	79%	21%
8A	61	9	87%	13%
8B	26	10	72%	28%
8C	31	9	78%	23%
8D	14	7	67%	33%
9	6	3	67%	33%
Other	29	22	57%	43%

31/03/2024				
Band	Female	Male	Female %	Male %
2	0	0	0%	0%
3	2	0	100%	0%
4	17	6	74%	26%
5	30	3	91%	9%
6	42	8	84%	16%
7	56	18	76%	24%
8A	67	12	85%	15%
8B	32	16	67%	33%
8C	29	9	76%	24%
8D	16	6	73%	27%
9	3	5	38%	63%
Other	33	28	54%	46%

*Does not include FTCs/ Secondments or acting up arrangements during Organisational Change process



Regional comparison

as of 1st March 2023



During 2024/25 Frimley and Buckinghamshire Oxfordshire and Berkshire West (BOB) ICBs were working collaboratively with an interim joint Chief People Officer.

The team at BOB reviewed the regional statistics available on the Government Equalities Office website and prepared the data on the following 2 slides

Further analysis will be carried out post 31st March 2025 when the recent data will be available



Comparison of South - East ICBs

as of 1st March 2023

Mean and Median

Integrated Care Board	Mean Pay Gap %	Median Pay Gap %	Bonus Pay Gap %
Buckinghamshire Oxfordshire and Berkshire West	24.9%	13.6%	No bonuses were paid.
Surrey Heartlands	6.9%	2.8%	No bonuses were paid.
Kent and Medway	25.6%	17.3%	No bonuses were paid.
Sussex	20.6%	14.2%	No bonuses were paid.
Hampshire and Isle of Wight	26.8%	24.7%	No bonuses were paid.
Frimley	20%	25%	No bonuses were paid.

The above information is drawn from the Government Equalities Office website. ICBs with the highest Pay Gap are in Red, whilst those with the lowest Pay Gap are in Green. Surrey Heartlands ICB had the lowest Mean and Median Pay Gap, while Hampshire and Isle of Wight ICB had the highest Mean Pay Gap and Frimley ICB had the highest Median Pay Gap.



Comparison of South - East ICBs

as of 1st March 2023

Pay Quartile

Integrated Care Board	Quartile 1	Quartile 2	Quartile 3	Quartile 4 (highest paid)
Buckinghamshire Oxfordshire and Berkshire West	86.1%	73.5%	78.7%	57.3%
Surrey Heartlands	83.5%	81.5%	78.5%	74.3%
Kent and Medway	89%	79%	74%	62%
Sussex ICB	81.4%	87.2%	75.1%	66%
Hampshire and Isle of Wight	88.4%	84.8%	74.7%	64.7%
Frimley	82.7%	85%	75.8%	65.9%

This Table highlights comparisons across pay quarters – focussing on the lowest pay quarter (Quartile 1) and highest pay quarter (Quartile 4). The ICBs with the lowest representation at Quartile 4 and highest representation at Quartile 1 are highlighted Red. BOB ICB had the lowest representation at Quartile 4 in March 2023.



Actions to be built into Task and Finish project plan:

Action	Timescale	Delivery Group
1. Establish a Task and Finish group reporting to EDI Group	April 2025	EDI Group / OD Group
2. Use data from 31/03 to inform action plan into 2025/26 (ensuring actions have clear timescales and benefit realisation – how we are closing the pay gap and how long it may take)	April 2025	Gender Pay Task and Finish Group
3. Publication of Sexual Misconduct Policy	April 2025	EDI Group / OD Group
4. Review Staff survey data from gender equality perspective and derive actions	April 2025	Gender Pay Task and Finish Group
5. Roll out OD plan (including inclusive talent strategy) across the ICB	Quarter 1	OD Group
6. Violence and aggression workstream through People Board	Quarter 1	People Board
7. Comparison of ICB's Gender Pay Gap results with ICB comparator groups.	Quarter 2	Gender Pay Task and Finish Group



Next steps in 2025/26

- Establish a Task and finish group, reporting to the EDI working group and onward to SLT
- Use the data at 31/03/25 to pull together an action plan which will be monitored within the Organisation Development delivery plan
- Engage with stakeholders and interested individuals identified through a variety of routes, such as all staff communications, Staff Partnership Forum, Line Manager Forum and the EDI Working Group
- Provide quarterly progress reports back to RemCom
- Publish our Sexual Misconduct policy alongside a full communications plan to inform and educate all staff. An e-learning module will be completed by all staff and more detailed training will be made available for those staff who may need to support an employee making a report of misconduct. Continued progress against the 10 commitments will be led and monitored by the steering group and reported on the to EDI working group
- Review our Staff survey from a gender equality perspective and report on key themes
- Gender focused sessions will be held with staff networks to identify intersectionality issues
- Relaunch of women's network in conjunction with International Women's Day
- Continue to promote ICB's flexible working arrangements to support work life balance and reduce need for part-time hours
- Review appraisals process to ensure all staff have career conversations and are supported to develop their personal development plans.
- Compare the ICB's Gender Pay Gap results with ICB comparator groups.
- The Organisation Development delivery plan as signed off by SLT includes the development of an inclusive talent strategy to create career development opportunities for everyone both internally and at system level.
- A dedicated violence and aggression workstream will be established through our system People Board

