

# Gender pay gap report

## What is a gender pay gap report?

Gender pay reporting legislation requires employers with 250 or more employees to publish statutory calculations every year showing the pay gap between their male and female employees.

The gender pay gap is the difference in the average pay between all men and women in a workforce.

It is important to note that gender pay reporting is different to equal pay - equal pay deals with the pay differences between men and women who carry out the same jobs, similar jobs or work of equal value. It is unlawful to pay people unequally because they are a man or a woman.

As an NHS organisation, pay and conditions at the ICB are determined by Agenda for Change and job evaluation. This ensures that roles of equal value receive equal remuneration. The ICB is confident therefore that its gender pay gap does not stem from paying men and women differently for the same or equivalent work.

## The gender pay gap indicators

An employer must publish the following six calculations:

- Average gender pay gap as a mean average
- Average gender pay gap as a median average
- Average bonus gender pay gap as a mean average
- Average bonus gender pay gap as a median average
- Proportion of males and females receiving a bonus payment
- Proportion of males and females when divided into quartiles from lowest to highest pay.

# NHS Devon ICB – 31 March 2024

## Average gender pay gap

| Hourly rate    | Male   | Female | Difference (%) |
|----------------|--------|--------|----------------|
| Mean average   | £37.57 | £25.83 | 31.24%         |
| Median average | £30.16 | £22.95 | 23.89%         |

## Average bonus gender pay gap

NHS Devon did not make any payments to staff which meet the bonus criteria. The average bonus gender pay gap is zero. The proportion of males of females receiving a bonus payment is zero.

## Gender proportions by quartile pay band

|              | Male   | Female |
|--------------|--------|--------|
| Lower        | 9.37%  | 90.63% |
| Lower middle | 17.36% | 82.64% |
| Upper middle | 22.63% | 77.37% |
| Upper        | 39.53% | 60.47% |

## NHS Devon ICB workforce composition

| Band        | Male   | Female |
|-------------|--------|--------|
| Band 2      | 0%     | 100%   |
| Band 3      | 11.76% | 88.24% |
| Band 4      | 6.82%  | 93.18% |
| Band 5      | 10.17% | 89.83% |
| Band 6      | 14%    | 86%    |
| Band 7      | 21.67% | 78.33% |
| Band 8      | 30.25% | 69.75% |
| Band 9      | 50%    | 50%    |
| Clinical    | 34.88% | 65.12% |
| VSM & Board | 63.16% | 36.84% |
| Overall     | 23%    | 77%    |

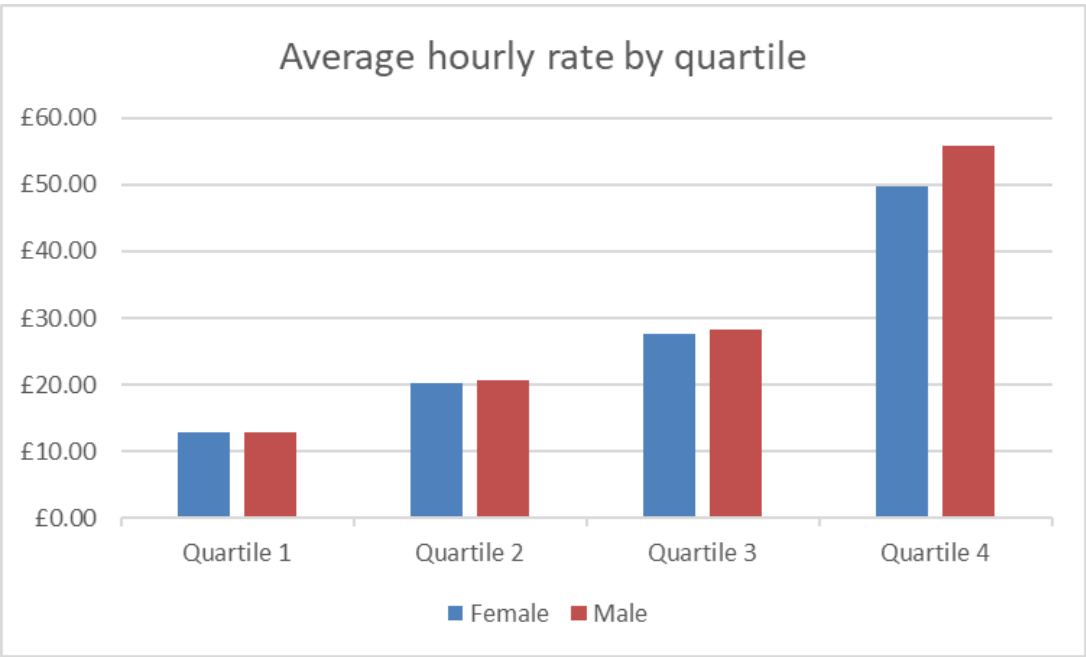
The current gender split within the overall workforce is 77% female and 23% male.

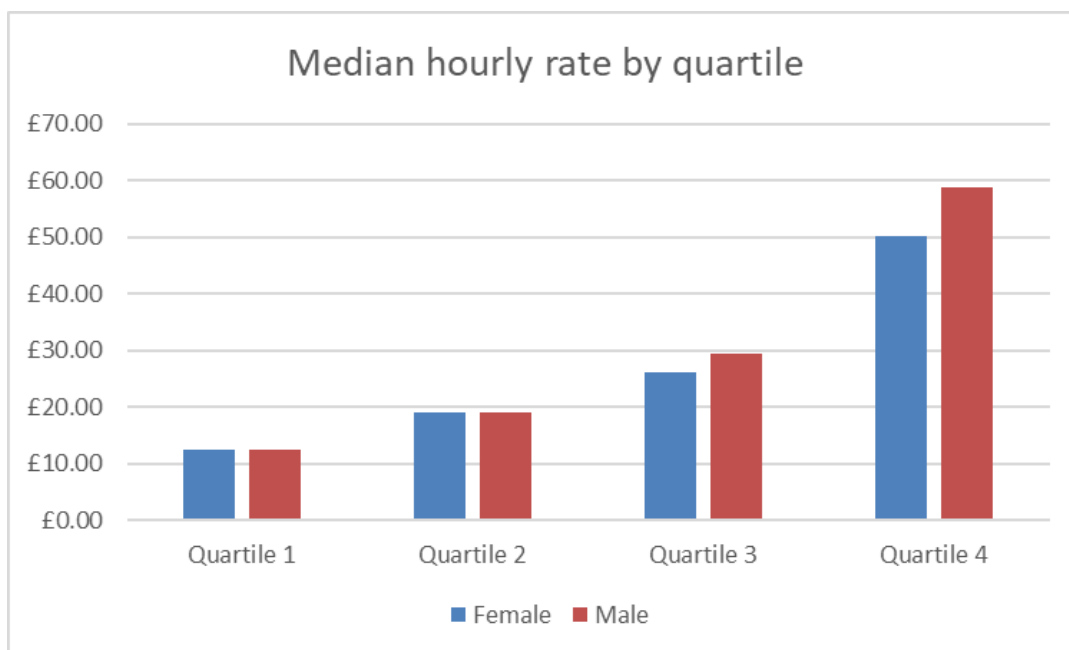
# Commentary

The table below shows how the gender pay gap at NHS Devon ICB, and its predecessor organisations, has fluctuated since 2017. In general, the gender pay gap has reduced over time.

| Organisation  | Year | Mean (%) | Median (%) |
|---------------|------|----------|------------|
| NEW Devon CCG | 2017 | 35.8     | 40.7       |
|               | 2018 | 33.6     | 39         |
|               | 2019 | 32.9     | 37         |
| NHS Devon CCG | 2020 | 30.0     | 30.2       |
|               | 2021 | 29.2     | 26.7       |
|               | 2022 | 25.5     | 23.2       |
| NHS Devon ICB | 2023 | 29.0     | 22.2       |
|               | 2024 | 31.2     | 23.9       |

In March 2024, both the mean and median gender pay gap increased. The following charts show average and median pay rates by gender and quartile.





The charts illustrate that, in the first three quartiles, pay rates are reasonably similar between men and women. The differential in pay rates is significantly higher in quartile 4 than the other quartiles. Quartile 4 is the highest paid staff in the organisation.

## Actions

Organisation change has been a key focus for the ICB in the past 12 months and resultantly, the proposed actions on gender pay were deliberately set at a modest level.

The following actions have been completed in 2024/2025:

- Provided recruitment training (including EDI training) for staff who are involved in recruitment decisions in the organisation change process. Ensured that selection panels are gender balanced as far as practicable.
- Continued to support and encourage flexible working for staff at all levels of the organisation. In 2024, HR has been notified of 20 formal flexible working applications. 3 are awaiting a response (e.g. waiting on occupational advice before decision is made) and the remaining 17 have been approved. Flexible working is also regularly discussed and considered as part of organisation change recruitment.
- Ensured that recruitment agencies the organisation works with are required to demonstrate their position on improving equality and diversity.

In the 2025/26 financial year, as we move out of organisational change, there is an opportunity to draw together different strands of work and deliver a more comprehensive and coherent plan for gender pay. The organisation change process will be largely finished and staff will be settled in roles after a long period of uncertainty.

In the forthcoming year, the ICB will commit to:

- In the 2025/26 financial year, as we move out of organisational change, there is an opportunity to draw together different strands of work and deliver a more comprehensive and coherent plan for gender pay. The organisation change process will be largely finished and staff will be settled in roles after a long period of uncertainty. The HR and workforce team will also have more capacity to devote to this area.
- A newly developed Women's Network has been established. Although this group is in the early stages of defining its focus and developing its priorities, there will be a strong overlap and natural alignment between priorities for the network and GPG considerations.
- The full GPG action plan is provided in the table below. You will notice that a key part of the action plan is to take the important step of gaining a deeper understanding of the experience of women, which will help to guide actions moving forward.
- Finally, and in addition to the action plan below, it is important to note that there is other work currently being progressed within the ICB that will likely have an impact on improved culture and equality, diversity and inclusion. For example, ICB also now has an approved Organisation Development (OD) plan and OD work is beginning to take place. Some elements of the OD plan, such as the work planned on leadership development, training and development, performance management, and developing a values and behaviour framework will support improved culture and have EDI embedded within them. Furthermore, the organisation has rolled out a programme of EQIA training to all staff which will further strengthen a cultural commitment to ensure the organisation considered EDI is all it does.

#### *GPG Action Plan 2025/26*

| Activity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Timescale  | Who                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|------------------------|
| <b>Women's Network - Experience Survey</b><br>Working with the newly established Women's Network, develop and implement a survey to understand the experience of women in the ICB. Areas include: <ul style="list-style-type: none"> <li>- Workplace culture and experience</li> <li>- Health and Wellbeing</li> <li>- Career progression and development</li> <li>- Mentoring and coaching</li> </ul> Results will be analysed to provide insight into experience and refine the focus of the Women's Network as required.<br>Furthermore, additional actions may be added to the GPG action plan following analysis and understanding gained from the results of this survey. These will be considered for the 2025 GPG report action plan (with a proposal to provide this report and action plan in the first quarter of 25/26 – see sections 16-19 of this report). | March 2025 | Women's Network and HR |
| <b>Perimenopause and menopause friendly workplace</b><br>Following lived-experience insights that will be gained through the Women's Network, the Women's Network Survey and best practice, identify and implement actions to make the ICB a more perimenopause and menopause-friendly workplace.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | March 2026 | Women's Network and HR |

|                                                                                                                                                                                                                                                                                                                                                                                                                      |                                  |                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|------------------------|
| <b>Pregnancy, maternity leave and return to work</b><br>Following lived-experience insights that will be gained through the Women's Network, the Women's Network Survey and best practice, identify and implement actions to improve colleague experience.                                                                                                                                                           | March 2026                       | Women's Network and HR |
| <b>HR policies and guidance documents</b><br>Following lived-experience insights that will be gained through the Women's Network, the Women's Network Survey and best practice, identify improvements to HR policies and guidance document. <i>Note, this action will need to consider the system ambition to have one set of Devon NHS HR policies and the development of a number of national people policies.</i> | March 2026                       | Women's Network and HR |
| <b>Exit Interviews</b><br>Review exit interview process and consider inclusion of questions focussed specifically on ICB experience for women.                                                                                                                                                                                                                                                                       | September 2025                   | Women's Network and HR |
| <b>Leadership, learning and development</b><br>Following lived-experience insights that will be gained through the Women's Network, the Women's Network Survey and best practice, inform the organisations' learning and development plan to ensure equality of opportunity for women in the organisation.<br><br>Co-ordinate 'lunch and learn sessions' with external speakers and training providers.              | September 2025<br><br>March 2026 | Women's Network and HR |
| <b>NHS Staff Survey</b><br>Work with the Women's Network to analyse NHS Staff Survey results from the perspective of Women's experience and identifying possible actions.<br><br>Consider expanding local questions to include questions about women's experience for 2025 staff survey.                                                                                                                             | April 2025<br><br>August 2025    | Women's Network and HR |

## Gender Pay Gap Reporting moving forward

GPG reports are based on information taken on 31st March of any year. Organisations then have until 31st March of the following year to publish their data and action plan.

NHS Devon currently produces its GPG report in January – March of any year but the data is reflective of the position as of 31st March of the previous year, and a lot can change in that time.

Therefore, moving forward, it is proposed that NHS Devon move its GPG reporting and action planning to April – July (1st quarter) of each year.

This would mean a report coming back through relevant committees in April – July 2025, showing our GPG data from 31<sup>st</sup> March 2025. This year, the action plan may be largely the same as the one shown in this report but there will be opportunity to add any further activity that is agreed following analysis of the local women's network survey and staff survey analysis.