

# Bridging the gender pay gap

April 2025

# About us

NHS Employers is the employers' organisation for the NHS in England. We support workforce leaders and represent employers to develop a sustainable workforce and be the best employers they can be. We also manage the relationships with NHS trade unions on behalf of the Secretary of State for Health and Social Care.

# Use this guide to:

- Learn about the six steps to gender pay gap reporting.
- Conduct a self-assessment to identify the causes which are specific to your organisation and are influencing your pay gap.
- Develop measurable actions to tackle your pay gap.
- Address challenges, including the importance of developing a narrative and explaining your figures.

# Testing testing



Danny Mortimer  
Chief Executive

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not sure where this will appear

# What is the gender pay gap

In 2019, gender pay gap reporting was introduced as mandatory for organisations with over 250 employees. Additionally, under the [NHS England EDI Improvement Plan](#) published in June 2023, NHS organisations have a target to eliminate pay gaps for both ethnicity and gender. Disability and other protected characteristics will be introduced from 2026 and beyond.

- Over the last five years, the [UK gender pay gap](#) has fallen by a fifth to 14.3 percent for all employees in 2023 and this includes the health and care sector.
- However, the gender pay gap still persists, with male health professionals, on average, still paid [10.2 per cent more](#) than their female counterparts in 2023.

Inequality continues to exist for many women working in the NHS and there are additional factors at play that should be acknowledged:

- [A British Medical Association survey](#) found that 91 per cent of women doctors had experienced sexism.
- The [2024 NHS Staff Survey](#) indicated that almost 9 per cent of staff have experienced sexual harassment, which increases to a quarter of staff working in the ambulance sector.
- [A British Medical Journal report](#) found that nearly a third of female surgeons had been sexually assaulted by a colleague.

In addition, [women](#) are experiencing [health inequalities](#), carry the majority of [caring responsibilities](#) at home and struggle to

progress in the workplace in comparison to their male peers. Intersectionality must also be acknowledged as a factor, with BME, disabled and LGBTQ+ women all facing additional challenges.

All of the above factors should not be seen in isolation from the persistent gender pay gap and should be considered when drafting your narrative and creating action plans.

### **Understanding the difference between equal pay and gender pay**

As set out in the Equality Act 2010, equal pay means that men and women in the same employment who are performing equal work or work of equal value, must receive equal pay. The gender pay gap is a measure that shows the difference in average earnings between men and women across an organisation or the labour market. It is expressed as a percentage of men's earnings and includes bonus and additional pay supplements, such as clinical excellence awards.

Ensuring equal pay is a fundamental responsibility for employers and in the NHS, the job evaluation scheme is used to measure job value or job weight in a consistent, equality proof way. While it is different to gender pay gap, ensuring good job evaluation practice will give confidence that staff are being paid appropriately for the jobs they are doing. If there is pay inequality, the gender pay gap will be exacerbated.

# Six steps to gender pay gap reporting

## Step one - planning the report

There is an annual snapshot date of 31 March for reporting and an annual deadline of 30 March the following year for organisations to submit their figures.

The [government guidance on gender pay gap reporting for employers](#) provides detailed information which includes:

- the types of pay to include in your calculations
- how to calculate the mean and median hourly rate differences between ordinary pay of male and female employees and when to include bonus and additional pay awards
- how to calculate the proportions of male and female employees in the lower, lower middle, upper middle and upper quartile pay bands by number of employees, rather than rate of pay.

## Step two - use ESR reports to produce the figures

There are specially designed reports produced by the NHS Electronic Staff Record (ESR) team that will help you calculate your gender pay gap data. These are accessible through the dashboard of ESR. You should direct any queries on this facility to your ESR contact. [Access this guide on the ESRBI national returns dashboard](#) and [on gender pay gap reporting in ESR from the NHS Electronic Staff Record](#) team. (Note to access these you will need a login for ESR.)

## Step three - enter the data into the government website

Once you have completed the analysis using the ESR reports, you are ready to enter the information on to the [government gender pay gap reporting website](#).

## Step four - analyse the reasons behind the figures

The narrative behind the figures is more important than the figures themselves. Without the narrative or an action plan, your gender pay gap reporting becomes a tick-box exercise. We advise that you include the following in your narrative:

- Separate out the various staff groups, for example Agenda for Change employees, medical and dental and very senior managers. This should demonstrate the effect that the pay of certain groups has on the whole picture across an organisation.
- Include any mitigating circumstances which may affect the gender pay gap figures.
- Include any reasons why the highest quartile for your organisation includes a smaller percentage of women than the other three. If your workforce is 80 per cent female, ideally, women should make up 80 per cent of each quartile.
- Include narrative around the progression of women within your workforce and analysis of the impact of part-time or flexible working.
- Consider intersectionality when looking at your figures. For example, do BME or disabled women have a larger pay gap than their white/non-disabled peers?
- Work in partnership with your staff side representatives and equality staff groups to gain a deeper understanding of some of



the qualitative reasons behind the figures.

## Step five - write a narrative

Using the information in step four to write a narrative for your own website and link from the narrative to the government website. For help writing your narrative, see the next section of the guide on addressing the challenges.

## Step six - create an action plan to the narrative

The most important part of gender pay gap reporting is the action plan created from the figures and the narrative. This will help you to address the reasons behind your gap and make meaningful change in your organisation.

Below we detail examples of key actions you can take to change the narrative.

# Addressing the challenges

## **Producing a narrative and explaining your figures**

The issues that surround the gender pay gap are complex and the causes are a mix of work, family and societal influences. The support provided by employers can influence all these factors and have wide-reaching implications on an employee's wellbeing, personal life and even on wider society, as well as solely on those associated with their work.

We strongly advise adding a supporting narrative to the gender pay gap information that you publish. This should be posted on both the government website and your organisation's website. This narrative should explain the figures you have published and help anyone reading the statement understand the organisation's view of why there is a gender pay gap (if one exists) and what the organisation intends to do to address it.

Publishing data without a narrative will not allow anyone looking at that data to fully understand the context and backdrop against which that data is being reported.

## **Examples of good practice from NHS organisations**

Take a look at these examples of gender pay gap reports published by four NHS organisations. They provide detail alongside good narratives to explain their gaps. You may wish to use these to guide you in developing your own narrative.

- [North London Mental Health Partnership](#)
- [Lancashire and South Cumbria NHS Foundation Trust](#)
- [Pennine Care](#)

- Yorkshire Ambulance Service

# Self assessment checklists and key actions

Our self-assessment checklists highlight some of the key considerations that may affect your organisations' gender pay gap. Completing the checklist will enable you to assess your progress against different areas and understand those which require focus and should be addressed in your action plan.

All organisations should also, in line with good practice, develop and publish a robust action plan that explains how it intends to tackle its gender pay gap. This plan should include targets and clear actions. This action plan should be reported to, discussed and endorsed by the board and be a vehicle for sending a strong signal of commitment to the workforce about their commitment to tackle gender equality in the workplace.

Taking evidence from existing analysis and guidance in relation to gender pay gap reporting, we have identified six areas in which organisations might want to focus their attention in terms of addressing and redressing a gender pay gap. It must be stressed however that each organisation will use their own combination of approaches and strategies according to their own data and the issues that it reveals.

## Checklist - Branding, communication and transparency



## Actions

- Analyse your data to see who is applying for and being appointed to particular roles - especially those where there is a gender pay gap. See whether you can change that pattern through better communication, the language you use, gender neutral adverts and branding to attract a different audience.
- Be transparent about processes, policies and criteria for decision making. Transparent promotion, pay and reward processes can help to reduce pay inequalities.
- Remember that perceptions are formed early on and perhaps target schools and colleges to ensure that people understand the range of roles available in the NHS and that they are open to both men and women.
- Make a bold, public commitment to reducing your gender pay gap, taking time to communicate and connect internally and

externally.

## Checklist - Recruitment and promotion processes

### Actions

- Regularly monitor and report on the gender profile for applicants, shortlisted candidates and appointments, at all levels and across all occupations and working patterns.
- Ensure that every requirement listed is something that is necessary for the job and skills that can be acquired on the role are not included as a pre-requisite.

- When shortlisting qualified candidates make sure more than one female applicant is considered.
- Provide recruiting managers with training around good recruitment practices and interviewing techniques and skills. Use diverse interview panels with women throughout the process, to ensure a variety of perspectives are involved and scrutiny is applied at all stages.
- Review your recruitment practices to see if you could do things in a different way that allows candidates to better demonstrate their ability to do the job. For example, use skill-based assessment tasks and structured interviews in recruitment rather than relying on unstructured interviews.
- Have clear and transparent job evaluation processes and procedures that allow staff to be appropriately paid for the work they do.

## Checklist – Parental, adoption and carers leave policies



## Actions

- Develop and promote good parental and adoption leave policies and encourage the uptake of shared parental leave, as per section 15 of the [NHS Terms and Conditions of Service Handbook](#). For example, inform future fathers that it's their legal right to request shared parental leave and provide future parents with guidance and personal support to understand the scheme.
- Offer enhanced shared parental pay at the same level as enhanced maternity pay.
- Share and promote examples of senior leaders, particularly male senior leaders, who have taken shared parental leave or have taken time off for caring responsibilities.
- Ensure you have a leave policy that facilitates staff to take leave to care for dependants that is separate to sickness or other



types of absence.

- Start parental leave conversations early, from the point you are notified of the pregnancy or intention to take parental/ adoption leave and encourage open conversations with your staff to ensure they feel supported in their journey. These should be led by the staff member and what they feel they need, don't make assumptions.
- Provide staff with robust information around free childcare hours, tax-free childcare scheme, flexible working options and examples of how staff have effectively utilised their keeping in touch days.
- Make sure your organisation and managers are trained to effectively support staff on parental leave and make the most of their keeping in touch days. Ensure staff are informed of events, job opportunities and key changes throughout their parental leave and are provided with support. Invest in a returners scheme, reaching out to those who went on parental leave and didn't return, offer them a structured support package to encourage them back. Consider how you can make the workplace a more appealing environment for these staff.
- Have open conversations and support women with caring responsibilities. This could be offering flexible working or providing carers leave when required. Create carers networks within your organisations where staff can find support.

## Checklist – Wellbeing and retention



## Actions

- Flexible working is an excellent way to both recruit and retain staff and support them to create a better work-life balance and under the Employment Relations (Flexible Working Act) 2023, employees now have the right to request flexible working arrangements. This is also covered under section 33 of the NHS Terms and Conditions of Service Handbook.
- Ensure you fully consider the benefits of these arrangements when dealing with these requests.
- Offer flexible working options for all staff. Encourage men to work flexibly, so that it isn't seen as a female-only benefit and supports both men and women to undertake childcare and other caring responsibilities.
- Where possible consider home or hybrid working patterns. This can be a permanent measure or as and when required by the

staff member.

- Provide training and support for all staff on supporting women's health. This should include the impact of the menopause, menstruation and conditions like endometriosis.
- Develop a menopause and menstruation policy and be prepared to make changes to support women continuing to work through this period.
- Encourage your senior leaders to role model working flexibly, taking time off work and, where possible, only working within working hours to allow for commitments outside of work.

## Checklist - Supporting female staff



## Actions

- Create female-led networks within your organisation or champion other similar networks that your female staff can be part of.
- Offer mentoring, coaching and sponsorship opportunities within your organisation that target women's development.
- Share and promote examples of senior female leaders and their career journeys.
- Join and encourage female colleagues to join the [Health and Care Women Leaders Network](#), a free network for women in the NHS and broader health and social care sector. The network is a diverse community of talented professional women who connect through events, networking and shared learning.

## Checklist - Tackling sexism, misogyny and sexual misconduct in the workplace

## Actions

- Develop a clear policy based on the [NHS England national people sexual misconduct policy framework](#) and encourage staff to complete the [e-learning](#).
- Educate all staff on sexism and sexual misconduct including students, with a focus on responding to reports of sexual violence for managers, culture change, allyship and preventing sexual misconduct.
- Create [psychologically safe workspaces](#) which create a culture where it is safe to speak up about inequity, harassment and misogyny and to ask questions and able to work without fear of retribution or retaliation.
- Sign up to the British Medical Association's [sexism in medicine pledge](#) to tackle gender discrimination in the medical profession.

# Checklist - Data analysis



## Actions

- Scrutinise your data closely. Understanding the drivers of your gender pay gap will allow you to target your actions to achieve effective results. Identify those departments, services and occupations where the gaps are bigger, or where the number of female appointments is lowest, and investigate why.
- Disaggregate your data in different ways, don't just look at the data by gender. Also, consider the differences in terms of age, disability, race and other minority groups and see if this gives you any better insights. Consider the impact of intersectional identities and if one group of interacting identity categories has a larger pay gap than others.

- Consider if there is a gap between part-time and full-time staff in rates of progression, promotion or within the organisation. This could indicate inadequate levels of support being provided to women with caring or childcare responsibilities.
- Analyse your NHS Staff Survey data, particularly focusing on the experience of women.

# Further resources

## Blogs

- In this King's Fund blog, Danielle Jefferies shares insights on [Why there's still work to be done to close the gender pay gap in the NHS and social care.](#)

## Guides

- Learn about the gender pay gap, find out which employers need to report and understand why it's important in this CIPD report [Gender pay gap reporting: Understand what it is, if you need to report and why.](#)
- Access the government's [Gender pay gap service](#) for essential information on gender pay gap reporting.
- [Published by the Equality and Human Rights Commission, find out about Gender pay gap: enforcement and the action that will be taken against organisations don't follow the rules.](#)
- Visit NHS Employers' page on [pay gaps](#) and learn about the different types and the significance of pay gap data.
- Read [ACAS guidance on managing employees maternity leave, pay and other rights.](#)
- Published by the government's equalities office, [Women's Progression in the Workplace](#) shares evidence-based actions employers can take to support women to progress, to help to close the gender pay gap and increase gender equality in the workplace.

## Reports



- Published by The Fawcett Society and the Runnymede Trust, Broken Ladders: The Myth of Meritocracy For Women of Colour in the Workplace is the first report of its kind to focus explicitly on the experiences and perspectives of women of colour in the workplace.
- Take a look at Mend the Gap: The Independent Review into Gender Pay Gaps in Medicine in England.
- Deloitte's Women @ Work 2024: A Global Outlook examines some of the critical workplace and societal factors that can profoundly impact women's careers.
- Published by Surviving in Scrubs, Surviving Healthcare: Sexism and Sexual Violence in the Healthcare Workforce provides analysis of 150 survivor stories. It contains recommendations for healthcare organisations to better support survivors and end these behaviours.
- The BMA's Sexism in medicine report is based on a survey of nearly 2,500 doctors and highlights an issue of sexism in the medical profession.

### **Case studies**

- Read how Dorset Healthcare is supporting working carers to stay in work.
- Learn about the Worker Protection Act 2023 and access new Equality and Human Rights Commission guidance around employers' legal duty to prevent sexual harassment.



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