

Disability Pay Gap Report Period— 31st March 2024

Publication March 2025

NHS Greater Manchester

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Foreword Janet Wilkinson, Chief People Officer

It is somewhat paradoxical that disabled people often encounter challenges within health and care workforce sectors fundamentally dedicated to health and well-being. However, the latest Workforce Disability Equality Standard (WDES) report offers encouraging insights. It highlights that disabled candidates are slightly more likely to be appointed from shortlisting compared to non-disabled candidates, and around 83% of staff reported that reasonable adjustments had been adequately implemented. While these are positive developments, there is still work to be done to ensure a fully inclusive and supportive working environment.

For example, broader challenges remain, particularly in tackling bullying and harassment and enhancing disability awareness among managers. Strengthening leadership capability in this area will be key to improving the overall workplace experience for disabled colleagues. The introduction of the Workplace Adjustment Passport is an important step in ensuring reasonable adjustments are applied consistently and effectively, supporting disabled staff in their roles. Additionally, since the last WDES report, work has continued to improve declaration rates, enabling a clearer picture of the workforce and informing further improvements.

Furthermore, the physically and emotionally demanding nature of many health and care roles can add to these challenges. Ironically, the very work we do can sometimes contribute to disability and long-term health conditions. However, given our expertise in health and clinical care, we are uniquely positioned to provide the best possible support for our disabled colleagues, ensuring they can thrive in the workplace.

Ultimately, we should set the standard as an inclusive and supportive employer of choice for disabled professionals. There should be no barriers only solutions.

PURPOSE OF REPORT:

Whilst there is no legal requirement to report on disability pay gaps, we are not driven by compliance, we are choosing to do so because tackling inequality is not only the right thing to do, both for our people and the communities, but it helps us to create a much more positive and stronger relationship with our existing and future employees, to help attract, develop and retain diverse talent from across our communities. Transparency is also important; it helps to ensure accountability, highlight where progress has been made, and encourage efforts to recognise and act on unwarranted disparities.

We are hoping this report will also go some way towards continuing to encourage more staff to feel comfortable enough to disclose their disability status so we can better address and remove barriers that may be impacting our people in their day-to-day lives. The report highlights that 162 (9.4%) employees have either chosen not to disclose their disability status, not specify or we don't have details of whether they are disabled, and this could have a bearing on the pay gap insights and the action we take. We will continue to encourage and support people to self-declare on ESR through our concerted actions to create an inclusive culture.

As of the latest data, approximately 23% of working-age adults in the UK are disabled ¹ which translates to around 5.1 million disabled people in employment as of Q2 2023 ² Disabled people in Greater Manchester as defined under the Equality Act, slightly higher than the national average. Given the high prevalence of poor health in Greater Manchester, we know our data is likely to be somewhat higher. It would be absurd for any employer not to address the disparities experienced by a quarter of their workforce or potential workforce, but given the challenging staff shortages in our sector, this evidence is really important to enable us to act

This report itself gives us a snapshot of our disability pay gap figures, taking into account all colleagues that were employed by NHS GM on the 31st of March 2024. We have produced our analysis using the same data set and approach that we've used to produce our 2024 Gender Pay Gap and ethnic pay gap analysis.

¹ [Disability facts and figures | Disability charity Scope UK](#)

² [Employment of disabled people 2023 - GOV.UK](#)

Declaration

I confirm the Disability pay gap data and information contained in this is accurate.

Note: The Mean figures will give a very good overall picture of the disability pay gap but can be distorted by very large or small pay rates or bonuses.

The Median figures, however, indicate the “typical” gap as it is not distorted by very large or small pay rates or bonuses. However, this means that not all disability pay gap issues will be picked up. They could also fail to pick up as effectively where the disability pay gap issues are most pronounced in the lowest paid or highest paid employees.

1. Mean Disability Pay Gap in Hourly Pay

The difference between the mean* hourly rate of pay of staff who are disabled, not disabled, and those who have stated “not declared” their Disability where hourly pay includes basic pay, bonuses, and allowances *average pay for all employees.

2. Median Disability Pay Gap in Hourly Pay

The difference between the median* hourly rate of staff who are disabled, not disabled, those “prefer not to answer” “not declared” “unspecified” their Disability *middle rate of pay (when listed in order) for all employees, as listed.

3. Mean Disability Pay Gap in Bonus Pay

The difference between the mean* bonus paid to staff are disabled, not disabled, those “prefer not to answer” “not declared” “unspecified” their Disability where bonus refers to a variety of bonus payments (see Point 4 below) *average bonus for all employees, as listed.

4. Median Disability Pay Gap in Bonus Pay

The difference between the median bonus pay paid to staff who are disabled, not disabled, those “prefer not to answer” “not declared” “unspecified” their Disability as middle value of bonuses paid to all employees, as listed.

5. Bonus proportions

The proportion of staff who have declared their disability who were paid a bonus.

6. Quartile bands

The proportions of staff who are disabled, not disabled, those “prefer not to answer” “not declared” “unspecified” their Disability in the lower, lower middle, upper middle, and upper quartile pay bands.

Introduction

At NHS Greater Manchester (NHS GM), our Health and Care People & Culture Strategy sets out how we plan to be an employer of choice, providing a great place to work that supports colleagues to develop their career aspirations, to recruit and retain the right talent with the wide range of knowledge, skills and capabilities we need, from the widest pool. We are committed to a diverse and inclusive culture which supports the fair treatment and reward of all colleagues, irrespective of who we are, and our pay framework is based on the principles of fairness, transparency, and consistency.

As we delve into the findings of this report, it is important to acknowledge the inherent dignity and worth of every individual, regardless of their background. Every person deserves the opportunity to participate fully in society, to pursue their passions and aspirations, and to be fairly compensated for their contributions, in work and outside of it.

The disability pay gap is just one indicator of disparities our disabled colleague face in the workplace. Please see our published WDES to better understand the compounded impact of structural barriers disabled people are facing in our health and care workforces in GM.

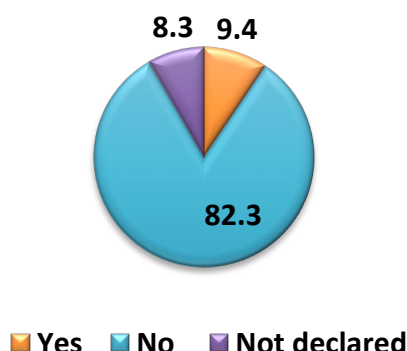
For context, the national disability pay gap remains a significant and stubborn issue, with little progress over the last few years. As of 2023, the national pay gap between disabled and non-disabled employees was 12.7%. This means that, on average, disabled employees earned £13.69 per hour, while non-disabled employees earned £15.69 per hour.

Summary of Workforce by Disability

NHS GM uses NHS Agenda for Change pay bands for the vast majority of staff. Bands vary by levels of responsibility and each band has a set pay range with increments. In the main colleagues move up the increments in their band on a length of service basis so that generally those who have spent longer in the same grade would be expected to earn more, regardless of disability. In addition, we have a small group of employees who are on pay scales other than Agenda for Change (AfC). These are our most senior employees who receive NHS Executive and Very Senior Manager salaries.

The pie chart below indicates that in 2024, 82.3% of the staff reported having no disability, 9.4% reported having a disability and 8.3% did not declare. This remains a significant way from the 24% of working age disabled people in our population. It is difficult to determine how much of this is down to lack of disclosure and how much is related to structural inequalities, but we know that both factors are at play.

Breakdown of NHS GM staff - self reported disability status 2024



Workplace declaration rates for disability are still problematic, and in line with national WDES findings, we see disparities in people who declare themselves as disabled on our ESR system (visible and identifiable) with our staff surveys (anonymous) indicating fear and mistrust of what harm declaration may have on careers.

Put simply, we have an under representation of disabled staff in our employment that gets worse the higher up the organisation you work. We are not alone in this, and we know nationally the employment rate of disabled people is 53.7%, against an employment rate of non-disabled people of 82.7%, an employment gap of around 29%. This has remained stubbornly the case for over a decade and beyond. However, the public sector – the largest employer of disabled people - has an employment rate of 26% disabled people, so there is plenty of exemplar practice for us to build and learn from.

In addition, we have a small group of employees who are on pay scales other than Agenda for Change (Afc). These are our most senior employees who receive NHS Executive and Very Senior Manager salaries.

Summary of Workforce by self-declared disability status

Table 1: Percentage of employees by self-reported disability status 2024

Table 1 highlights that 22.00% of staff are in Band 7 making it one of the largest staff categories

Are you a disabled person?				
Pay Grade	No	Yes	Not declared	Proportion of overall
AfC2	0.60%	0.60%	0	0.50%
AfC3	4.70%	4.70%	5%	5.00%
AfC4	7.40%	7.55%	7.10%	7.00%
AfC5	11.40%	10.70%	12.80%	11.00%
AfC6	14.00%	13.20%	15%	14.00%
AfC7	22.10%	22.60%	16.40%	22.00%
AfC8a	13.20%	16.35%	15.70%	14.00%
AfC8b	10.00%	9.40%	7.90%	10.00%
AfC8c	4.50%	4.40%	2.10%	4.00%
AfC8d	3.70%	5.00%	2.10%	4.00%
AfC9	1.20%	1.90%	2.10%	1.00%
Apprentice	0.10%	0.60%	0	0.50%
Other	7%	0.60%	13.60%	7%
Grand Total	82.30%	9.40%	8.30%	100.00%

Table 1: Percentage of employees by self-reported disability status in each pay band 2023 and 2024.

The evidence in table 2 below shows the highest numbers of declared disabled colleagues in band 7 and 8a with a sharp tail off as the grades increase. There has been slight improvement in the rate of no declaration which has decreased from 9.30% in 2023 to 8.30 in 2024. There is also a marked decrease in some of the very early grades. This insight assists us in being able to target disclosure campaigns and address the potential barriers to progression into more senior roles.

Are you a disabled person?								
Pay Grade	NO		YES		Not Declared		Proportion of Overall	
	2023	2024	2023	2024	2023	2024	2023	2024
AfC2	0.40%	0.60%	0.00%	0.60%	0.00%	0	0.30%	0.50%
AfC3	5.70%	4.70%	5.30%	4.70%	18.40%	5%	5.80%	5.00%
AfC4	7.60%	7.40%	8.30%	7.55%	26.70%	7.10%	7.70%	7.00%
AfC5	11.30%	11.40%	9.10%	10.70%	34.40%	12.80%	11.30%	11.00%
AfC6	13.20%	14.00%	17.40%	13.20%	35.30%	15%	13.50%	14.00%
AfC7	22.00%	22.10%	21.20%	22.60%	56.90%	16.40%	21.60%	22.00%
AfC8a	14.20%	13.20%	15.90%	16.35%	42.00%	15.70%	14.20%	14.00%
AfC8b	8.40%	10.00%	10.60%	9.40%	24.40%	7.90%	8.50%	10.00%
AfC8c	4.10%	4.50%	2.30%	4.40%	7.40%	2.10%	3.80%	4.00%
AfC8d	2.90%	3.70%	3.80%	5.00%	6.60%	2.10%	2.90%	4.00%
AfC9	1.10%	1.20%	0.80%	1.90%	0.00%	2.10%	1.00%	1.00%
Apprentice	1.60%	0.10%	1.50%	0.60%	0.00%	0	1.50%	0.50%
Other	7.50%	7%	3.80%	0.60%	47.70%	13.60%	7.90%	7%
Grand Total	83.20%	82.30%	7.50%	9.40%	9.30%	8.30%	100%	100.00%

Table 2: Comparison of Self Declaration Rates

Notable progress has been observed with percentage of disabled employees in Band 8a, 8c and 8d which increased by 1-1.5% in 2024 compared to previous year. However, it remains important to consider the overall significant underrepresentation of disabled staff in workforce. This evidence will also us to review the impact of the work we undertook to address workforce disparities last year and hone down what is working and what is not working further.

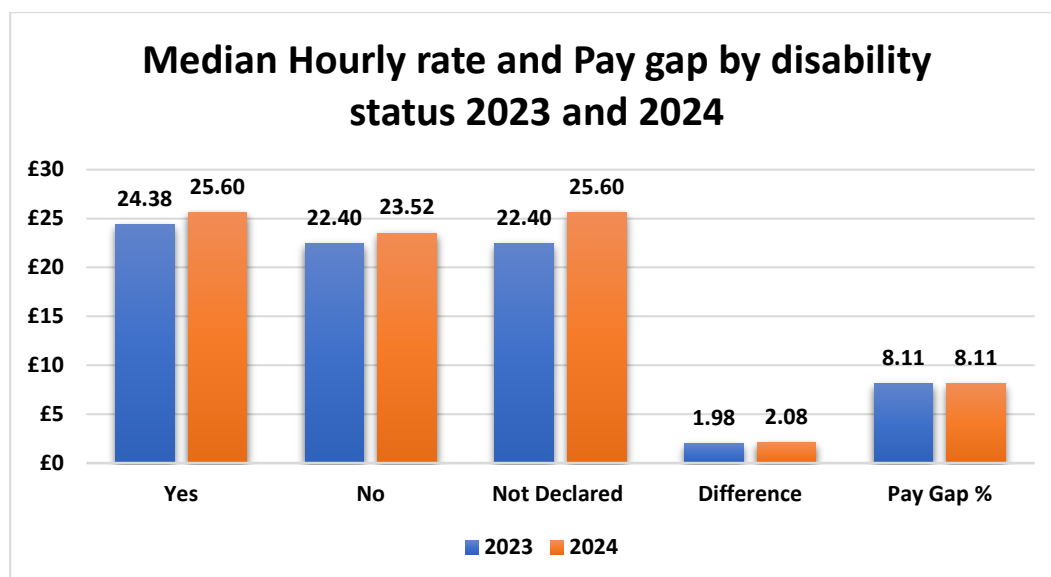
Calculation 1 and 2: Median Calculation

Table 3 below shows the overall median and mean disability pay gap based on hourly rates of pay as at the snapshot date of 31 March 2024 and compared with data as at 31 March 2023, **highlighting no change** in median hourly rate.

	2023	2023	2024	2024
Disability	Mean Hourly Rate	Median Hourly Rate	Mean Hourly Rate	Median Hourly Rate
Yes	£24.65	£24.38	£26.64	£25.60
No	£26.64	£22.40	£27.73	£23.52
Not declared	£29.62	£22.40	£31.13	£25.60
Difference	£1.62	£1.9	£1.09	£1.8
Pay gap	6.18%	8.11%	4.09%	8.11%

Table 3: Hourly rates and disability pay gap 2023 and 2024

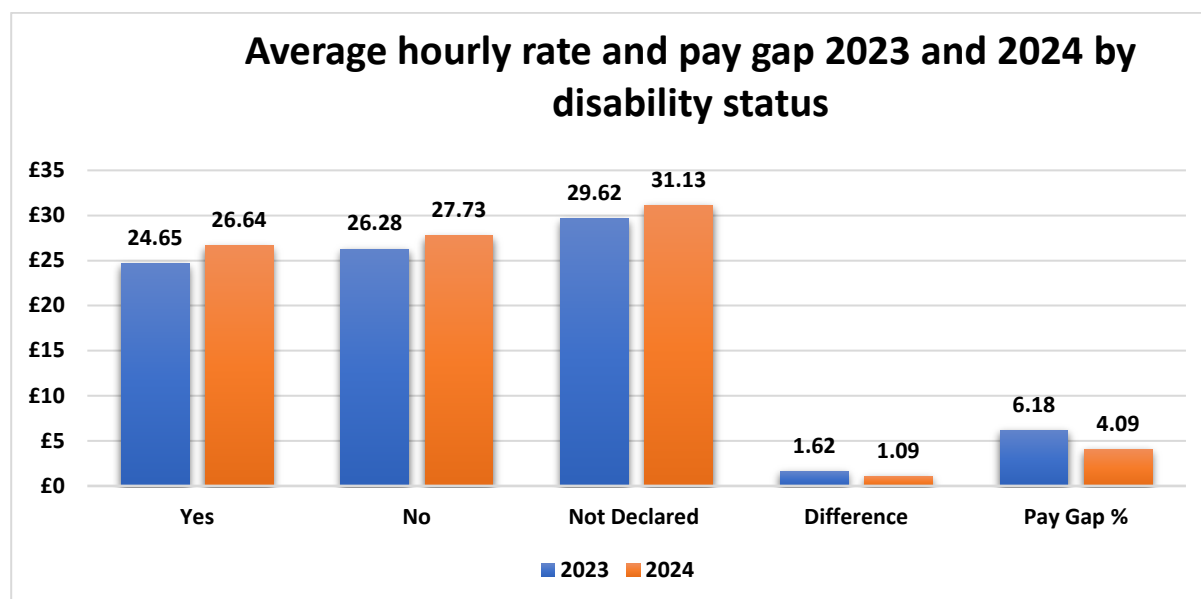
Bar graph 1: Median Hourly rate and pay gap by disability status 2023 and 2024.



Bar Graph 1 highlights that the median hourly difference against no disability in 2024 was £2.08 compared to £1.98 in 2023. Despite this increase, the overall pay gap difference in both years remained consistent at 8.11%. This is a concerning finding and one we should focus on to ensure we can turn this upwards trend in the right direction and at the right pace next year.

Bar Graph 2: Mean hourly rate and pay gap 2023& 2024 by disability status.

Bar Graph 2 illustrates that on average disabled staff earned £1.09/ hour less compared to those staff with no reported disability in 2024. This represents a slight improvement from 2023 where the difference stood at £1.62/hour. The improvement was reflected in pay gap for 2024 which decreased to 4.09 from 6.18 in 2023. However, there is still more work to do.



Our disability pay gap evidence indicates we have work to do to remove disparities in pay for our disabled staff. We know from well documented evidence that barriers to disabled people in recruitment practices, access to work and career progression are all contributing towards our pay disparities for disabled staff – something we can and should readily tackle and remove.

Table 4: Number of employees | Q1 = Low, Q4 = High) Disability Data by Quartiles

Quartile	Disability			Disability %		
	Yes	No	Not Declared/ Prefer Not to Answer	Yes %	No %	Not Declared/ Prefer Not to Answer %
1	37	344	36	8.87%	82.49%	8.63%
2	40	358	30	9.35%	83.64%	7.01%
3	44	334	33	10.71%	81.27%	8.03%
4	37	356	41	8.53%	82.03%	9.45%

Table 4 shows the number of staff who declared their disability status as Yes, No or Not declared in each pay quartile. It also highlights that the highest rates of declaration of disability status is in quartile 3. The highest rate of non-disclosure is in quartile 4.

Conclusion

We have reported on our disability pay gap for the second time and are gaining important insights into the data and intersectional issues which will form part of our reporting in the future.

The widest disability pay gap is primarily driven by a lack of representation.

Our aim is to create an inclusive, safe, and empowering environment, so that our people and our inclusive culture thrives, individually and collectively, so actions need to be prioritised to where action is most needed and, of course, to continue to ensure that our culture is always inclusive and underpinned by respect and dignity for all.

Like with any other protected and/or disadvantaged group of staff; in order to better understand the root causes of these pay disparities we will need more granular data to better understand the sorts of barriers that exist for potential and actual disabled employees – be that in relation to mobility and dexterity, sensory, neuro-diverse, long term ill health, mental ill health or cognitive impairment groups. This will form part of the ongoing analysis that will help us achieve improved conditions that will reduce our disability pay gaps.

We will also benefit from a more sophisticated intersectional perspective across pay gap disparities to understand those staff at multiple disadvantages in our workplaces as a result of institutional or systemic discrimination. This will form part of our cross-referenced pay gap and working conditions analysis that will assist us to better understand and address the intersectional disparities faced by our staff in relation to sex, ethnicity and disability.

The examination, understanding and publication of pay gaps is a key milestone in our ongoing commitment to transparency, fairness, and equity within NHS GM. We are therefore pleased to be sharing our annual Gender Pay Gap Report, this will shortly be followed by Ethnicity and Disability Pay Gap reports.

By fostering transparency and accountability, we are not only ensuring fairness for our employees but also strengthening our organisation's ability to attract a future workforce that broadly represents the communities we are part of and so proudly serve.

Overall, the Pay gap reports provide a comprehensive overview of the pay landscape within our organisation, by presenting comprehensive data and valuable insights into the distribution of pay across different demographics, we can identify any variations and take appropriate action to rectify them.

The publication of these reports is just the beginning of our journey. Our pay gap analysis and wider equality data are vital in driving change, but they are just one part of the picture. What is equally important is how these insights go on to improve the lived experience of our colleagues.

We must go beyond numbers and statistics, delving deeper into the systemic factors that perpetuate inequality. By acknowledging inequalities wherever they exist it is only then we can move onto committing to and delivering concrete action, and can create workplaces where everyone, regardless of background is valued and rewarded equitably for their contributions.

It is essential to remember that creating a truly inclusive workplace requires ongoing commitment, collaboration, and action from all of us. Each one of us plays a crucial role in upholding our values and driving positive change within NHS GM.

We welcome this opportunity to use pay reporting to hold us to account and to ensure we are always striving to do better and commit ourselves to fostering a culture of openness and dialogue. It is only through this transparency and dialogue that we can confront the root causes of pay disparities and drive meaningful change.

In publishing the report, we want to use this opportunity to reaffirm our commitment to building and sustaining an inclusive culture. Together, let us chart a course towards a future where pay gaps are consigned to history, and equity is a reality for everyone.

The findings of the 2024 Disability Pay Gap Report reaffirm the pressing need for systemic change at NHS GM. While incremental progress has been made, the persistence of the 8.11% median pay gap highlights structural challenges that require pressing intervention.

Addressing the disability pay gap is not just about pay it is about an inclusive culture where all employees, regardless of disability status, have equal access to opportunities, career growth, and fair pay.

Through proactive policy review, leadership accountability, and a commitment to workforce equity, NHS GM aspires to be a model employer for disability inclusion within the NHS and beyond. We remain resolute in our goal to eliminate barriers, increase representation, and ensure that all employees are valued and rewarded equitably for their contributions.

NHS GM Action Plan for 2025 to address Disability pay gaps.

Since the NHS WDES was introduced in 2019, we are starting to see relevant patterns and trends that are contributing towards the conditions limiting potential for disabled people to develop their careers in our NHS workforces, allowing us to develop best practice to address our disability pay gaps.

We have also started our community co-produced Foundations for Change programme to start to learn and address the barriers to our disabled employees to flourish in the workplace. This framework provides the foundational building blocks of an inclusive system that uses the social model of disability as the standard for workplaces across Greater Manchester's health, social care and locality sectors.

We expect to continue to invest in this programme alongside drawing evidence from our inclusion staff networks, staff surveys and Workforce Disability Equality Scheme data and intelligence to set out robust evidence-based actions to redress the systemic imbalances that are holding back our employees for unwarranted and unfair reasons.

The table below summarises the progress made from actions included in last year's disability pay gap report.

Action No.	February 2024	February 2025 Update
1	How we harmoniously and consistently record disability in the workplace – this action is in progress as part of a comms campaign to encourage colleagues to disclose and record any disability they may have by recording it on ESR>	In Progress
2	How we encourage greater disclosure rates – current comms campaign to increase self-declaration rates.	In Progress
3	How we understand and address multiple disadvantages in our workforces as a result of intersectional discrimination and disadvantage	In Progress
4	Need to address an inconsistent offer of access to work and reasonable adjustments in the workplace, including training for line managers of disabled staff	In Progress
5	Continue to roll out the workplace adjustment passport (WAP) for employees and their line managers to facilitate conversations, to help identify the support needs of colleagues with disabilities and long-term health/neurodivergent conditions to ensure they are understood and accommodated in the workplace.	In Progress
6	A review of flexible working and job carving opportunities	In Progress

7	HR Policy and procedure reviews to impact assess for disability inclusion.	In Progress
8	The sharing of and easily available resources for best practice for becoming an exemplar employer for disabled people	Not Started
9	Co-production with disabled employees and disabled peoples' organisations such as Breakthrough UK for cultivating an inclusive cultural environment for disabled staff.	In Progress
10	Work closely with the newly formed disability peer support network to raise awareness around the definitions of disability and promote sign up of workplace adjustment passport via events advertised in our internal newsletter.	New action for 2025

Summary of Key Findings and actions for 2025

Workforce Representation

Underrepresentation of Disabled Employees

Only **9.4%** of the NHS GM workforce has declared a disability, significantly lower than the **24%** of working-age disabled people in the UK. This discrepancy suggests barriers to recruitment, progression, and disclosure.

Leadership and Senior Role Disparities

Disabled employees are disproportionately represented in lower pay bands, with a sharp decline beyond Band 7. In Bands 8a and above, representation is critically low, limiting influence in decision-making and policy-shaping.

Pay Disparities

Median Disability Pay Gap

8.11% (2024), indicating that disabled employees continue to earn significantly less than their non-disabled counterparts.

Mean Disability Pay Gap

Improved from **6.18% in 2023** to **4.09% in 2024**, reflecting some progress but still highlighting existing inequities.

Barriers to Disclosure

Many employees with disabilities may choose not to disclose their status due to stigma, fears of discrimination, or uncertainty about organisational support.

A lack of trust in workforce data collection mechanisms hinders accurate reporting and the effectiveness of inclusion strategies.

Enhanced Action Plan for 2025 and Beyond

- To close the disability pay gap and improve workplace equity, NHS GM is committed to implementing a strategic, data-driven, and accountability-focused action plan.

Increasing Disability Disclosure and Data Accuracy

- Continue work on the awareness campaign highlighting the benefits of self-declaration and how workforce data informs policy improvements.

Addressing Recruitment and Career Progression Barriers

- Establish targeted development opportunities for disabled employees, particularly in Bands 6–8a, to support career progression into leadership roles, this could be in the form of stretch opportunities on transformation programmes/projects, mentoring etc.
- Disability-inclusive recruitment training for hiring managers, ensuring bias-free selection processes.
- Set aspirational representation targets to increase the number of disabled employees in senior positions by 2030.
- Collaborate with external disability organisations (e.g., Breakthrough UK) to improve inclusive hiring strategies.

Enhancing Workplace Adjustments and Support

- Ensure full implementation and tracking of WAPs to provide consistent, timely support for employees requiring adjustments.
- Ensure managers receive targeted training on supporting disabled employees effectively.

Fostering an Inclusive Organisational Culture

- Embed co-production with disabled employees in policy development and workplace

decision-making, particularly where it affects disabled people.

Leveraging Intersectional Data Analysis

- Cross-analyse disability pay gap data with ethnicity, gender, and age metrics to identify compounding inequalities.
- Develop tailored interventions for employees facing multiple barriers to equitable pay and progression.

Accountability, Monitoring, and Reporting

- NHS GM is committed to transparency and measurable impact. We will:
- Publish an annual Disability Pay Gap Report tracking progress, challenges, and next steps.
- Work with the Inclusion Staff Network and Trade Union Colleagues to assist in monitoring action plans.
- Introduce KPIs to ensure accountability in reducing the disability pay gap

Useful Resources

[Disabled people in Employment 2023 House of Commons report](#)

[Foundations for Change report 2023](#)

[ONS Disability Pay Gaps 2021](#)

The committee is invited to:

1. Note the contents and discuss the report/make suggestions for further improvement.
2. Approve the data, as set out in the report, to be published on the NHS GM website.
3. Support the next steps and actions to reduce the NHS GM's Disability pay gap.
4. Report back to the People and Culture Committee with progress on the Disability Pay gap as part of ongoing reporting.