

Ethnicity Pay Gap Reporting 2026

Background to the Trust

The Norfolk and Norwich University Hospital (NNUH) is a 1,200 bed teaching hospital with state of the art facilities for modern patient care. NNUH is one of the largest teaching hospitals in England serving predominantly the people of Norfolk and North Suffolk.

Ethnicity Pay Gap Reporting – Introduction

The UK government has been reviewing whether to create the statutory requirement for employers to measure pay discrepancies between ethnic groups ever since the introduction of the requirement for employers to record the gender pay gap in 2017. Previously, several reports and consultations failed to establish mandatory ethnicity pay gap standards.

Despite this, last year our Trust decided to report on its ethnicity pay gap as part of its Caring with Pride Corporate strategy, People and Culture strategy and Diversity, Inclusion and Belonging Strategy as well as its commitment to being an anti-racist organisation. While we welcome the announcement of mandatory ethnicity pay gap standards in 2026, the Trust is still currently working in the absence of a mandatory framework for this and have had to select our own reporting measures.

As a Trust we have chosen to align our calculations with the gender pay gap but also take into account the complexity of ethnicity pay reporting compared with gender pay reporting. We have chosen to replicate the measure used in gender pay gap reporting with some changes, to account for the different data sets. The gender pay gap report compares two distinct groups – male and female – whereas ethnicity recorded on ESR can fall into one of four broad categories: white, Black, Asian and minority ethnic, blank (not recorded) and unspecified (chose not to answer). The way that gender is recorded on ESR means that there can be no blank or unspecified records. In calculating the mean and median differences, we have chosen to focus on those who have specified their ethnicity to give the most precise view of the ethnicity pay gap in the Trust, as people with blank or undeclared ethnicities could either be Black, Asian and minority ethnic or white. The blank and unspecified records are included in the Trust average.

We have presented the data using the following calculations:

- The mean and median ethnicity pay gaps
- The mean and median ethnicity bonus pay gap
- The proportion of Black, Asian and minority ethnic and white employees who received a bonus
- The proportions of Black, Asian and minority ethnic and white employees in each pay quartile

The ethnicity pay gap report shows the difference in the average pay between Black, Asian and minority ethnic staff in our workforce. Where there is a positive percentage, this means that the pay of white staff is higher than the pay of Black, Asian and minority ethnic employees. Where there is a negative percentage this means the pay gap is in favour of Black, Asian and minority ethnic employees.

All calculations relate to the pay period in which the snapshot day falls, which is 31 March 2025. This report is in line with the Equality Act 2010 regulations. The workforce of 10,162 employees were categorised as “relevant employees” for the purposes of the ethnicity pay calculations; the same data set as the gender pay gap was used.

Workforce Profile

The table below shows the proportions of the relevant workforce from a Black, Asian and minority ethnic background and a white background, as well as those who had not completed their ethnicity on Electronic Staff Record (ESR) and those who had indicated they did not wish to disclose their ethnicity (“Blank/Not Stated”).

Breakdown by:	All Staff	%
Ethnicity		
Asian or Asian British	957.1	10.7%
Black or Black British	571.0	6.4%
Blank/Not Stated	576.4	6.5%
Mixed	166.3	1.9%
Other	295.3	3.3%
White British	5,775.5	64.8%
White Other	572.7	6.4%

The Core Calculations

<u>The core calculations</u>		31 March 2025	31 March 2024
1.	The mean ethnicity pay gap for NNUH	-15.6%	-16.8%
2.	The median ethnicity pay gap for NNUH	-7.2%	-8.7%
3.	The mean ethnicity bonus* gap for NNUH	10.6%	11.9%
4.	The median ethnicity bonus* gap for NNUH	27.2%	11.8%
5.	The proportion of white staff receiving a bonus* payment	1.4%	2.2%
6.	The proportion of BAME staff receiving a bonus* payment	1.8%	4.0%
7.	The proportion ‘Not Stated’ staff receiving a bonus payment	1.6%	1.9%

Pay Quartiles by Ethnicity

Please note that the bracketed figures are from the EPGR 31 March 2024

Quartile	Hourly Rate Top of Quartile	BAME HC in Quartile	White HC in Quartile	'Not Stated' in Quartile	BAME % in the quartile	White % in the quartile	Not Stated % in the quartile
1	£14.36 (£13.44)	294 (244)	2,151 (2153)	115 (136)	11.5 % (9.6%)	84.0% (85.0%)	4.5% (5.4%)
2	£18.83 (£17.86)	569 (504)	1,840 (1856)	160 (177)	22.1% (19.6%)	71.6% (73.2%)	6.2% (7.0%)
3	£24.82 (£23.40)	636 (525)	1,711 (1837)	172 (182)	25.2% (20.6%)	67.9% (72.2%)	6.8% (7.2%)
4	£163.30 (£127.85)	639 (608)	1,794 (1763)	192 (177)	24.3% (23.9%)	68.3% (69.2%)	7.3% (6.9%)
Total		2,138	7,496	639	20.8%	73.0%	6.2%

Understanding the Ethnicity Pay Gap Data

A pay gap is not the same as unequal pay. Unequal pay means that employees performing equal work, or work of equal value, are not receiving equal pay. It is unlawful to discriminate both directly and indirectly against employees and people seeking work because of their race, including ethnicity. This includes paying an employee less or giving them terms and conditions which put them at a disadvantage because of their race.

An ethnicity pay gap is a measure of the difference between ethnic groups' average earnings across an organisation or the labour market over a period, regardless of role or seniority. It is not a like-for-like comparison of employees of different ethnicities. Even if an employer has a fair pay and reward policy, and even if it has equal pay, it could still have a pay gap.

For example, a company has 5 pay bands with equal numbers of employees in each. At each pay band, employees of all ethnicities doing equal work, or work of equal value, are paid the same. This means the employer has equal pay. However, a higher proportion of black and Asian employees are in the lowest pay bands, and a higher proportion of white British employees are in the highest pay bands. This means that the average hourly pay for black and Asian employees is lower than the average hourly pay for white British employees. As such, the employer would have a pay gap, despite having equal pay.

We have found it helpful to review the staffing profile across the NNUH and understand the 'ethnicity pay gap' within each 'pay band/ group'. Below is a table which reflects the pay bands in operation. The information in the table is sourced from the same data which provided the ethnicity pay gap figures, i.e. the staffing position as at 31 March 2025.

* Positive figures in the column 'Pay Gap by payband indicate a pay gap in favour of white staff

	31/03/2025	31/03/2025	31/03/2025	31/03/2025	31/03/2025	31/03/2025	31/03/2024	31/03/2024	31/03/2024	31/03/2024	31/03/2024	31/03/2024
Pay Band	BAME Headcount	BAME Avg Hourly Rate £	White Headcount	White Avg Hourly Rate £	Pay Gap by payband	Total headcount	BAME Headcount	BAME Avg Hourly Rate £	White Headcount	White Avg Hourly Rate £	Pay Gap by payband	Total headcount
Apprentice	2	£6.4	32	£6.8	6.2%	38	1	£5.3	34	£5.7	7.6%	38
Band 1	0	-	1	£12.1	-	1	0	-	1	£11.4	-	1
Band 2	92	£13.7	701	£13.0	-5.1%	830	348	£14.7	1713	£13.2	-11.2%	2,203
Band 3	410	£15.2	1677	£13.9	-9.3%	2221	71	£13.1	879	£12.8	-2.4%	985
Band 4	63	£14.5	811	£14.7	0.8%	901	98	£14.2	796	£13.9	-1.6%	939
Band 5	677	£19.4	1179	£18.6	-4.0%	2,037	556	£18.5	1190	£17.8	-3.8%	1,949
Band 6	233	£21.9	1242	£22.4	2.2%	1,525	179	£20.9	1229	£21.4	2.2%	1,456
Band 7	66	£25.6	754	£26.0	1.8%	852	57	£23.9	718	£24.8	3.7%	801
Band 8a	25	£30.0	269	£29.7	-1.0%	306	24	£27.8	265	£27.7	-0.5%	300
Band 8b	<10	£32.9	110	£33.9	3.0%	120	<10	£32.1	99	£31.6	-1.5%	109
Band 8c	<10	£37.4	35	£39.8	6.0%	42	<10	£35.4	37	£37.4	5.2%	44
Band 8d	<10	£50.9	24	£49.0	-3.8%	27	<10	£45.1	18	£45.7	1.5%	21
Band 9	<10	£58.9	19	£56.5	-4.3%	21	<10	£52.6	19	£52.7	0.2%	20
Non Consultant Medical	347	£32.3	274	£32.6	1.0%	729	343	£28.2	257	£29.7	5.0%	709
Consultant	207	£59.7	347	£62.9	5.1%	598	187	£53.9	333	£56.7	5.0%	562
Exec/Non-Exec Directors	<5	£41.8	14	£74.6	44.0%	17	<5	£67.1	12	£72.4	7.3%	14
Trust Contract	<5	-	7	£56.6	-	8	<5	£16.5	9	£54.5	69.6%	11
Total	2,138	£24.9	7,496	£21.6	-15.6%	10,273	1,881	£23.3	7,609	£20.0	-16.8%	10,162

On face value, the above data indicates that for AfC bands the ethnicity pay gap is in favour of Black, Asian and Minority Ethnic staff within bands; 2,3,5, and 8a and 8d and Band 9. These figures contribute to the mean ethnicity pay gap of -15.6%.

To help further explain this, 15.1% of our workforce are from a Black, Asian and Minority Ethnic background. Of 15.1% we have clustered the pay brackets as follows; 27% of BAME staff are within Bands 1-4, 47% are within Bands 5-9 and 28% are within the medical pay bracket.

Band Grouping	White	BAME
Band 1-4	43%	27%
Band 5-9	48%	47%
Medical staff	8%	26%

Further breakdown of average hourly rates by ethnic group

Following our 2023 reporting, the NNUH Together Staff Network recommended that we should provide further analysis on each ethnic group so that we have a wider understanding of the pay gap(s).

The following table shows that the average mean hourly pay for white employees is £1.00 less than ethnically diverse employees, which still shows a mean pay gap in favour of ethnically diverse employees. The largest mean pay gap when comparing with White British staff appears to be Asian or Asian British where there is a -31.0% gap in favour of Asian or Asian British. The reasoning behind this may be due to our previous explanation that a higher proportion of our Asian and Asian British staff work within the medical roles.

	Headcount	Avg Hourly Rate	Median Hourly Rate	Hourly Rate Difference to White British	Pay Gap to White British
Asian or Asian British	989	£27.5	£21.3	−£6.3	−29.8%
Black or Black British	639	£20.7	£18.6	£0.4	2.1%
Mixed	188	£23.6	£19.2	−£2.4	−11.3%
Other ethnic group	322	£26.2	£21.4	−£5.0	−23.6%
White British	6,846	£21.2	£18.4	-	-
White Other	650	£25.6	£20.2	−£4.4	−20.7%
Blank/Not Stated	639	£24.2	£20.0	−£3.0	−14.1%
Total	10,273	£22.4	£18.8	−£1.2	−5.9%

Understanding the Bonus Gap data

Within the Gender Pay Gap Reporting Regulations, ‘bonus pay’ means any remuneration that is the form of money relating to profit sharing, productivity, performance, incentive or commission. It is clear within the regulations that bonus pay does not include ordinary pay, overtime pay, redundancy pay or termination payments. In the absence of a mandatory

framework we have chosen to align our reporting of the Ethnicity Bonus Pay Gap with the Gender Bonus Pay Gap standards.

Our bonus pay gap data has been calculated on the basis of the national Clinical Improvement Awards and National Clinical Excellence Awards (CEA) and Local CEA Awards. The CEA scheme is intended to recognise and reward those Consultants who perform 'over and above' the standard expected for their role. Awards are given for quality and excellence, acknowledging exceptional personal contributions towards the delivery of safe and high quality care to patients and to the continuous improvement of NHS services.

The local CEA awards were made 'non-competitive' in 2024, meaning that any CEA bonus pay awarded has been granted based on their eligibility rather than the requirement to apply for the award. This means that any bonus pay gaps reflected in our report may not show a fully accurate picture of any current bonus pay disparity in the Trust.

As at 31 March 2024, the NNUH had a total of 562 consultants. These individuals tend to undertake some of the highest paid roles in the Trust, and on top of their salary may receive a CEA award. Following the Gender Pay Gap Reporting regulations, we have provided a reporting of bonuses as a percentage of the entire workforce by Black, Asian and Minority Ethnic staff, White staff and those who have not stated their ethnicity.

The proportion eligible consultants receiving a CEA award is:

As a % of:	BAME		As a % of:	White		As a % of:	Not Stated	
Entire workforce	38 of 10,273	0.4%	Entire workforce	107 of 10,273	1.0%	Entire workforce	10 of 10,273	0.1%
BAME workforce	38 of 2,138	1.8%	White Workforce	107 of 7,496	1.4%	Not stated workforce	10 of 639	1.6%
All consultants	38 of 598	6.4%	All consultants	107 of 598	17.9%	All consultants	10 of 598	1.7 %
BAME consultants	38 of 207	18.4%	White consultants	107 of 347	30.8%	Not stated consultants	10 of 44	22.7%

Conclusions/Recommendations

Our overall mean ethnicity pay gap is in favour of our Black, Asian and Minority ethnic staff however, through many discussions within our networks we recognise that this reported favourable pay gap may not always reflect the lived experiences of our Black, Asian and Minority Ethnic staff within the Trust. It is also important to note that this is not the outcome

we are aiming for as we are looking to achieve a proportionate balance between our White and Black, Asian and Minority Ethnic staff and so more improvement initiatives are required.

It is also of note that staff data on ESR does not currently capture ethnicity information for all staff. Whilst this may not significantly impact onto our ethnicity pay gap, we will continue to encourage staff to update this data to give increased confidence in our reporting.

It is important that the Trust continues to focus on further improvements against both the WRES and the Diversity, Inclusion and Belonging strategy objectives to continue with progress. Such objectives include:

- Implement balanced interview panels in respect of ethnicity for Band 8a and above roles and introduce positive action statements onto job adverts for Band 8a and above roles.
- Review our divisional governance framework for EDI. Work with divisions to embed EDI objectives/ initiatives for each division.
- Review our recruitment policy and process to ensure a de-bias approach and governance of unfair practices.
- Work with managers to undertake meaningful career conversations with all staff. Monitor the progression of BAME/international nursing staff specifically.
- Implement a clear process to enable staff to be able to shadow senior leaders or be coached by them.

We will also look to regularly engage with system partners and initiatives that promote best practices in diversity and pay equity.

Continuously monitoring progress will ensure that efforts to reduce the pay gap are effective and sustainable. It's crucial to recognise that this is an ongoing process that requires long-term commitment, resources, and cultural change at all levels of the organisation.