

Pay gaps report and Workforce Race Equality Standard (WRES) Survey **2024**

Published March 2025

What are pay gaps?

Pay gaps are an equality measure that show the difference in average and median earnings for different groups of people in an organisation. At the NMC we publish our gender, ethnicity and disability pay gaps each year. Publishing our gender pay gap is a legal requirement, and we voluntarily publish our ethnicity and disability pay gaps as part of our commitment to transparency and improvement in these areas.

We don't award bonuses at the NMC, so we don't report a bonus gap.

Gender pay gap

As an employer with more than 250 employees, we have had a legal duty since 2017 to publish our gender pay gap data and a written statement on our website. We report our data to the online government pay gap reporting service.

The gender pay gap measures the gap between the average pay for women against the average pay for men.

Ethnicity pay gap

The ethnicity pay gap measures the difference between the average pay for Black, Asian and ethnic minority colleagues, and the average pay for white colleagues. We choose to publish our ethnicity pay gap using the same methodology as the gender pay gap, as recommended by CIPD (Chartered Institute of Personnel and Development). We do this to be transparent and to help us set actions to tackle race inequality.

Disability pay gap

We also publish our data on the average pay for disabled and non-disabled colleagues using the same criteria. This is to help us understand where gaps may exist, and what action we need to take to improve disability equality in our workforce.

What's the difference between mean and median?

The mean pay gap measures the average pay for one group against another, for example the average pay for women in an organisation compared to the average pay for men.

The median pay gap compares the 'middle' pay for one group against another, when all values are ranged from low to high. The median is less affected by outliers when compared to the mean.

What's the Workforce Race Equality Standard?

The NHS Workforce Race Equality Standard (WRES) is a framework that measures workforce race equality. The NMC voluntarily started to report against the standard in 2020 and we have used it to support our equality, diversity and inclusion (EDI) work for colleagues since then.

This year we have taken a slightly different approach to gathering information about our performance against the standard. We have incorporated the questions into our annual employee engagement survey called 'Your Voice'. We did this to improve participation by colleagues and strengthen how we benchmark all of our data to help understand colleagues' experience at work. We also used it to build on learning from the Independent Culture Review which was commissioned by the NMC from Nazir Afzal OBE and Rise Associates and published in July 2024.

More than 80 percent of colleagues completed a detailed survey as part of the Independent Culture Review. The survey ran from March to May 2024 and informed the report. The publication of the [Independent Culture Review](#) was a humbling moment for the NMC. Colleagues spoke up about racism and other forms of discrimination, bullying and harassment. You can read more, including the full [review](#), on our website.

The following summarises data from the Your Voice survey and analysis, alongside our pay gap data.

What does our data show?

The data in this report show our pay gaps as of 31 March 2024, and include data from our Your Voice survey which closed on 27 September 2024. We normally publish this earlier in the year, but we decided to delay publication to March 2025 to allow time to reflect on the recommendations from the Independent Culture Review. There were also practical reasons, such as the need to align with the timing of the annual Your Voice survey for the Workforce Race Equality Standard.

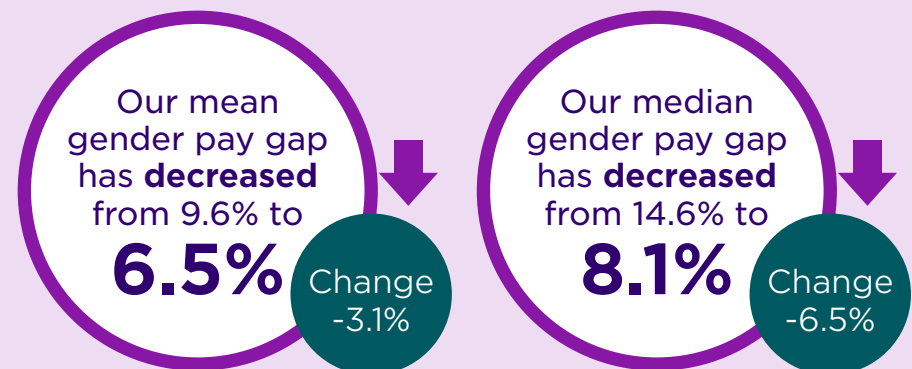
One of the key changes we made in 2024 was to start publishing pay gap data internally every two months alongside other EDI and workforce data for greater transparency. In 2025 we will make further additions to this internal information sharing, following recommendations from the Independent Culture Review.

While context and data are important and show we have strengths to build on, we must also understand and consider the lived experience of colleagues. Our overarching message and commitment are that we need and want to go further to reduce our pay gaps. This report sets out how we will achieve that aim.

Gender

We have seen a decrease in our mean and median gender pay gaps.

This was due to an increase in the number of female colleagues working in both upper and upper middle quartiles increasing by 21 and 14 employees respectively, whereas the number of male colleagues in these quartiles only increased by three and two colleagues respectively. We also saw an increase in the distribution of male colleagues working in our lower quartile.



Ethnicity

There has been an increase in our median ethnicity pay gap while the mean is unchanged.

Overall, the number of Black, Asian and ethnic minority colleagues working at the NMC increased by 32 colleagues, meaning 40.3 percent of employees at the NMC now come from a Black, Asian and ethnic minority background.

The main reason for the increase in our median pay gap was the increase in Black, Asian and ethnic minority colleagues working in our lower middle quartile and a decrease in white colleagues working in our lower and lower middle quartiles. In the upper middle quartile, there was a 0.6 percent increase in Black, Asian and ethnic minority colleagues and a 1 percent increase in white colleagues. In the upper quartile (where turnover is very low) there was no change. Our mean has remained the same due to actions in our annual pay review which gave greater percentage pay increases to colleagues in lower and lower middle quartiles.



Disability

We have seen a decrease in our mean and median disability pay gaps.

The NMC has a negative disability pay gap, meaning that the average pay for disabled colleagues is higher than for non-disabled colleagues. This gap has widened since our last report. The main reason for the change is an increase in the number of colleagues in our upper and upper middle quartile declaring a disability.

Since our last report the number of colleagues who have told us about their disability status has increased by 0.9 percentage points. This means the number of disabled colleagues working at the NMC increased by seven, according to the data we hold, but we still need to do more, so that all colleagues feel comfortable sharing their disability status with us.



Workforce Race and Equality Standard (WRES)

When looking at the WRES indicators, four have improved, two have worsened and one has stayed the same:

In past years we have reported against nine WRES indicators. In the 2024 reporting period we moved the WRES survey to a new platform - our employee engagement survey Your Voice - to increase participation rates in the survey. The result was not like-for-like to WRES but has helped to improve take up of the WRES questions (this is the first WRES indicator, known as the engagement score) from 34.3 percent to 57 percent.

The platform we use does not allow for “yes/no” questions so we needed to reframe our approach and include key responsive questions specifically relating to bullying, harassment, and discrimination, for example - “I believe the Nursing and Midwifery Council would respond appropriately to instances of bullying, harassment and discrimination” which are like the WRES indicators.

The WRES indicators not covered by Your Voice were however, covered in detail by the Independent Culture Review and make up a significant part of the recommendations from that report. Our new approach combined with the questions and responses captured in the Independent Culture Review provide invaluable learning and the opportunity to add focused questions to future surveys to enable us to assess progress and take further immediate actions.

Another area of improvement was in the overall Black, Asian and ethnic minority representation across the NMC’s workforce. This indicator increased by 0.5 percentage points in 2024. The proportion of colleagues from a Black, Asian and ethnic minority background now stands at 40.3 percent in 2024 compared to 39.8 percent in 2023, which is 13.9 percentage points higher than the NHS average.

In 2023, 0.7 percent of Black, Asian and ethnic minority employees went through a formal disciplinary process compared to 0.2 percent of white employees. In 2024, 0.9 percent of Black, Asian and ethnic minority colleagues went through a formal disciplinary process compared to 0.4 percent of white employees. This means there was a decrease in the likelihood of Black, Asian and ethnic minority employees going through a formal disciplinary process in 2024 compared to 2023. However, given how small the figures are (numbers between one and four people involved), it is difficult to see this as meaningful progress. More relevant is the feedback from colleagues going through a formal process.

On the indicator of people's perceptions of equal opportunities for career progression, this improved for both white and Black, Asian and ethnic minority colleagues, but again we feel there is learning from the Independent Culture Review that can be applied as it is clear that the indicator at this level does not tell a complete story.

Two indicators worsened. These were the likelihood of Black, Asian and ethnic minority candidates for roles being appointed and employees having fair opportunity in accessing non-mandatory training. In 2023, shortlisted white applicants to the NMC were 1.84 times more likely to be appointed compared to shortlisted Black, Asian and ethnic minority applicants which is an increase of 0.6 points from the last dataset and 0.25 higher than the NHS average. The relative likelihood of Black, Asian and ethnic minority colleagues receiving non-mandatory training has decreased since 2023. White colleagues are now 1.02 times more likely to receive non-mandatory training than Black, Asian and ethnic minority colleagues compared to 2023 when they were equally likely.

Within the reporting period, the make-up of the Board did not change, and so this indicator remained static. Subsequently, there have been positive changes that will be reported in next year's report.

What are we doing to tackle the issues raised?

We recognise that these data point to the need for improvement. Over the past year we have made some progress, but we know we have much more to do.

We have also learned from the past about the importance of aligning our ambitions with our resources, ensuring realistic and impactful goals. To that end we will prioritise the delivery of the actions from the Independent Culture Review to help address the issues that colleagues have clearly told us need to improve.

A step change in leadership and management capabilities

We have introduced a new approach to **appraisals** that means all colleagues have regular discussions with their managers about their performance, wellbeing and development. Completion rates have risen from around 60 percent to 97 percent of NMC colleagues having an appraisal. This now provides a solid foundation for starting to roll out individual learning and development and 360-degree feedback for managers, which began with Executive Directors in early 2025.

We have also seen progress on **senior recruitment**. For example, promotions at grades seven to 11 (the most senior grades apart from the executive team) are consistent at around four out of 10 being Black, Asian and ethnic minority colleagues in the 12 months to January 2025.

We have also published a new **behaviour framework** for employees with EDI principles embedded throughout. This will support all colleagues to understand what behaviours are expected at each stage of their career and how this links to our values. We will further develop the framework to address career progression and performance management within the organisation. We have more to do to embed these initiatives and introduce others such as reverse mentoring.

A workplace where everyone is afforded dignity

We have been consulting colleagues on how we can **improve key policies** such as 'Dignity at work' and 'Bullying, harassment and discrimination'. We are also strengthening our **EDI data** and sharing it transparently with colleagues. These projects will be completed by April 2025. Since the launch of our new intranet at the beginning of 2025, policies are more accessible to colleagues.

In moving towards a culture where **people feel safer to raise concerns**, we are seeing an expected increase in HR casework related to bullying, harassment and discrimination. While there are still issues which relate to trust and safety to speak up, it is encouraging to see some evidence that issues are being raised and dealt with and that leaders are tackling issues more consistently.

We have also started our '**Empowered to Speak Up**' service for colleagues, with the appointment of an external, independent 'Freedom to Speak Up' Guardian and designation of 13 colleagues as trained Empowered to Speak Up Ambassadors.

Equality, diversity and inclusion (EDI)

We have appointed an **EDI advisor** to the Executive Board and Council - Mac Alonge from The Equal Group. This work includes reviewing EDI learning and training and helping to improve our workplace policies (see above).

The **new NMC EDI plan** will be published in 2025, incorporating colleagues' feedback and recommendations from the Independent Culture Review, and including a strong focus on an **anti-racist plan**. We have also committed to signing up to UNISON's anti-racism charter.

We have made good progress in 2024- 2025 (since this reporting period) on increasing representation of Black, Asian and ethnic minority colleagues in **managerial and senior roles** which we hope to demonstrate in our next pay gaps report.

Working with our **procurement** team we have also partnered with a greater variety of Black, Asian and ethnic minority-owned and managed organisations, who have helped us improve our approach to recruitment and our policies. We will continue to build on this.

We have **five employee networks** to support our colleagues and provide a safe space to learn and appreciate diversity: BeMe, LGBT+, Women's Network, Workaround and Parents and Carers. The newest of these is the Women's Network, established in 2024 to help improve women's experience, celebrate key dates and organise community events.

In December 2024, in collaboration with Workaround (a network set up by colleagues with different kinds of disabilities or long-term conditions) and external specialist provider Business Disability Forum (BDF), we signed up to the [**Disability Confident employer scheme**](#) which commits us to offering **paid employment** and **job shadowing** opportunities to people with disabilities. We aim to do more with BDF in 2025.

Summary

We are setting a new direction and transforming our culture so that our colleagues can thrive at work and deliver the best possible outcomes for the public we're here to protect and the professionals we regulate.

To deliver sustainable change, we're taking action to realise positive changes in our culture.

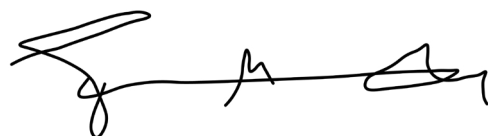
It may take some time before people see the impact of some of the decisions and actions we're taking forward, but we're putting in place ways to measure success and we're confident we're heading in the right direction. We recognise we have much more to do and will continue to report on these actions and the progress we make in 2025.

If you'd like to get in touch about anything raised in this report, please contact Equality@nmc-uk.org.

I confirm that the information in this report is accurate and in line with government reporting requirements

Gavin Kennedy

Interim Executive Director of People and Organisational Effectiveness



March 2025

The terminology used throughout this document is 'Black, Asian and ethnic minority.' This aligns with terminology recommended in government good practice guidelines. The NMC recognises that language in this area is constantly changing and that the people included within such broad terms encompass diverse ethnic groups. We regularly keep the language that we use under review.



23 Portland Place,
London W1B 1PZ

+44 20 7637 7181

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