

## People and Resources Committee

<b>Meeting Date</b>	13 March 2025
<b>Title</b>	Pay gap reports
<b>Author(s)</b>	Fatma Ali, Head of HR and OD
<b>Executive Sponsor</b>	Alastair Bridges, Executive Director of Resources

### Executive Summary

Enclosed are the HCPC 2024 gender, ethnicity and disability pay gap reports, a mandatory annual disclosure for employers with 250 or more employees under legislation enacted in April 2017. While there is not yet a legal obligation to report ethnicity pay gaps, for the past 5 years the HCPC has voluntarily disclosed this information in alignment with our commitment to placing equality, diversity, and inclusion at the core of our organisational values. In addition, this year, the HCPC has decided to report on its disability pay gap reporting ahead of potential changes to the legislation.

### Gender Pay Gap (GPG)

The gender pay gap is the hourly pay difference between female and male colleagues. It can be measured in different ways.

The HCPC's **mean pay gap is 16.5% (15.6% in 2023)**, demonstrating that male employees, on average, receive higher compensation than their female counterparts. The **median is 13.4%** moving from **14.3%** in 2023.

### Ethnicity Pay Gap (EPG)

The **mean ethnicity pay gap is 28% (26.1% in 2023)**, with a **median gap of 21.1% (18.6% in 2023)**.

The main factor contributing to the ethnicity pay gap is the uneven distribution of employees from ethnic minority backgrounds across different pay bands, resulting in a higher concentration in lower bands and a lower representation in higher bands.

### Disability Pay Gap (DPG)

The mean disability gap is 12.8%, with a median gap of 10.2%. According to the Office of National Statistics, the disability pay gap in the UK was 12.7% in 2023. The disability pay gap has remained broadly stable between 2014 and 2023.

<b>Action required</b>	The Committee is asked to consider and approve the proposal or recommendation.
<b>Previous consideration</b>	Previous <a href="#">annual reports</a> have been noted by the committee prior to them being published.
<b>Next steps</b>	<p>The report will be published on the government <a href="#">website</a> prior to 4 April 2025.</p> <p>Further actions on how to reduce the HCPC pay gaps have been planned for and these will be reviewed in line with the People Strategy, EDI action plan and departmental workplans.</p>
<b>Financial and resource implications</b>	Actions for this year have been included in 2025-2026 work plan and associated budget.
<b>Associated strategic priority/priorities</b>	<p>Build a resilient, healthy, capable and sustainable organisation</p> <p>Be visible, engaged and informed</p> <p>Continuously improve and innovate</p>
<b>Associated strategic risk(s)</b>	<p>5.b Our organisational values are not reflected at all levels of the organisation, leading to staff not feeling supported/trusted/listened to</p> <p>5.a The resources we require to achieve our strategy are not in place or are not sustainable</p> <p>4. We are unable to effectively build trust, engage with and influence our stakeholders, reducing our ability to understand their perspectives and regulate effectively</p>
<b>Risk appetite</b>	<p>People - open</p> <p>Compliance - measured</p>
<b>Communication and engagement</b>	<p>The report will be published on the government <a href="#">website</a> prior to 4 April 2025.</p> <p>The report will also be published on the HCPC website.</p>
<b>Equality, diversity and inclusion (EDI) impact and Welsh language standards</b>	N/A
<b>Other impact assessments</b>	

<b>Reason for consideration in the private session of the meeting (if applicable)</b>	Not applicable
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# HCPC gender, ethnicity and disability pay gaps report 2024

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# Foreword

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Welcome to the HCPC's gender, ethnicity and disability pay gaps report using data in April 2024. Our commitment to equality, diversity, and inclusion (EDI) is integral to our vision of being recognised as an actively anti-discriminatory organisation that champions best practices in equality, diversity, and inclusion. This vision aligns with our corporate strategy 2021-26 and our values, which have EDI at their core.

EDI is fundamental to the HCPC's role as a high-performing compassionate regulator, ensuring public protection through evidence-based regulation. In this report, we provide an analysis of our gender, ethnicity and disability pay gaps. This data is presented for the snapshot date of 5 April 2024, covering 293 employees. We adhere to the government's gender pay gap reporting requirements for all HCPC employees.

Additionally, we continue to report on our ethnicity pay gap, and this is the first year we are reporting on our disability pay gap, going beyond legal requirements in line with our commitment to transparency and our strategic ambitions. While not legally required, analysing and publishing data on ethnicity and disability along gender pay gaps allows us to identify areas for improvement and contribute to important discussions on challenges faced by ethnic minority and disability communities within the workforce.

Our ambition, as outlined in our people strategy, is to reduce our ethnicity pay gap and maintain a minimal gender pay gap. To achieve this, we will closely monitor our key performance indicators (KPIs) and measure the impact in alignment with our people strategy.

Thank you for engaging with our report. It reflects our dedication to transparency, accountability, and our ongoing commitment to fostering an inclusive workplace.

**Bernie O'Reilly**

**Chief Executive and Registrar**

# HCPC pay gaps reports

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Pay gaps serve as an equality indicator, highlighting differences in average and median earnings across various groups within an organisation. The HCPC releases annual reports on the gender and ethnicity pay gaps, with this year marking the first publication of the disability pay gap. While reporting the gender pay gap is a legal obligation, the HCPC voluntarily discloses the ethnicity and disability pay gaps to demonstrate its commitment to transparency and ongoing improvement in these areas.

## Gender pay gap - all employees

The analysis helps us to identify gaps among employees and allows us to implement targeted measures to address any disparities and promote gender equality within the workforce.

## Ethnicity pay gap

We publish the ethnicity pay gap to promote transparency and inclusivity within the organisation. While there is no legal requirement to report on the ethnicity pay gap, we do so as part of our commitment to equality, diversity, and inclusion (EDI).

## Disability pay gap

We also report data on the average pay of disabled and non-disabled employees, applying the same criteria used for other pay gap analyses. This reporting aims to identify any existing disparities and inform the actions required to enhance disability equality within the workforce.

# What are the HCPC pay gaps?

The tables presented on this page detail the HCPC's pay gap data as of April 2024<sup>1</sup>.

As the HCPC does not award bonuses, no bonus gap data is reported.

## Gender pay gap - All employees

	Mean	Median
2024	16.5%	13.4%
2023	15.6%	14.3%
Change	+0.9%	-0.9%

## Ethnicity pay gap

	Mean	Median
2024	28.0%	21.1%
2023	26.1%	18.6%
Change	+1.9%	+2.5%

## Disability pay gap

	Mean	Median
2024	12.8%	10.2%

The latest data reveals a reduction in the median gender pay gap.

However, a broader analysis indicates increases in both gender and ethnicity pay gaps. Despite this, there are notable areas of progress:

- Recruitment of ethnic minority colleagues at the HCPC rose by 11% compared to the previous year.
- Women comprise 50% of the Executive Board, with two of the four members being female.
- Female representation among employees has remained consistently high, accounting for 61% of the workforce in 2024, up from 60% in 2023.

While data and context provide valuable insights, they do not fully capture the lived experiences of colleagues. The HCPC recognises the need to build on its strengths and remains committed to taking further action to reduce pay gaps. This report outlines the steps the organisation will take to achieve this objective.

### What is 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.

The ONS estimates the gender pay gap on the basis of median hourly earnings rather than the mean since it is not affected by extreme values. If we consider the mid-point range, it would indicate the typical pay or average median earnings within the female and male population.

<sup>1</sup> Data displayed in all chart views have been rounded to one decimal places in order to improve readability

# What do the pay gap figures tell us?

Pay gaps exist for many different reasons, but most significant is the unequal distribution of different groups at different grades.

## Gender pay gap - all employees

The HCPC's mean gender pay gap is 16.5%. This disparity is primarily attributed to the distribution of male and female employees across the pay quartiles. Specifically, a higher proportion of female employees are concentrated in the lower middle and lower pay quartiles compared to their male counterparts. The upper quartile plays a significant role in this gap, contributing 24.21 percentage points to the overall mean pay gap. This indicates that differences in pay within the upper quartile are the largest factor driving the gender pay gap, despite the gap being reported at 16.5%.

The HCPC's median gender pay gap is 13.4%. This figure represents the difference in the midpoint hourly pay between male and female employees. Unlike the mean, the median focuses

on the central value within the pay distribution, offering a clearer view of typical pay levels that are not influenced by outliers or extreme pay rates. These figures highlight the impact of pay distribution on the HCPC's gender pay gap and underscore the significant role of the upper quartile in driving disparities.

## What are the underlying causes of the HCPC's gender pay gap for its employees?

The HCPC has been monitoring equal pay, which deals with the pay differences between men and women who carry out similar jobs, for several years. The current pay policy was set up to reduce the risks of any unfair disparity between pay for the same or similar work or work of equal value.

The key contributor to the HCPC's gender pay gap for employees is the disproportionate representation of women in lower pay bands, particularly in Bands E and D. While women make up 61% of HCPC's workforce and outnumber men across all pay quartiles except the upper quartile, they are especially concentrated in the lower middle and lower quartiles. This uneven distribution results in a lower average hourly rate for female employees, contributing significantly to the overall gender pay gap.



## Ethnicity pay gap

90% of employees that disclosed their ethnicity, 32% told us that they are from an ethnic minority background (47% from last year). The largest proportion of the HCPC workforce is 58% of white ethnicity (43% from last year) and 10% have not disclosed or have stated unknown as their ethnicity (10% from last year), the latter of which have been excluded from the figures.

The HCPC's mean ethnicity pay gap is 28%. Mean averages are useful because they place the same value on every number they use, giving a good overall indication of the ethnicity pay gap. However, very large or small pay rates can dominate and distort the answer as can the proportion of white and ethnic minority colleagues within the workforce.

The gap can be explained by where ethnic minority employees can be found in our pay band structure. More white employees can be found within the higher pay bands compared to ethnic minority employees, which remains from the past years; In the meantime, the proportion of ethnic minority employees increased 2.8% within the lower quartile and decreased 5.2% within the upper middle quartile compared to last year.

The data for pay quartiles shows that there are relatively higher numbers of ethnic minority employees than white employees in roles on lower pay bands in the organisation, on the contrary in roles on higher pay bands. This distribution is the primary reason for the HCPC's ethnicity pay gap.

The HCPC's median ethnicity pay gap is 21.1%. Median averages are useful to indicate what the 'typical' situation is in the middle of an organisation and are not distorted by very large or small pay rates.

The HCPC is committed in supporting under-represented employees in gaining experience and knowledge to progress to higher pay band role.

## Disability pay gap

87% of employees that disclosed their disability information, 9% told us that they have disability. The largest proportion of the HCPC workforce is 78% of non-disabled and 13% have not disclosed or have stated unknown as their disability, the latter of which have been excluded from the figures.

The HCPC's mean disability pay gap is 12.8%. This gap is largely due to the higher concentration of disabled employees in the lower and lower middle pay quartiles, compared to non-disabled employees, who are more frequently found in the upper middle and upper quartiles. The upper quartile is the largest contributor, accounting for 18.38 percentage points of the 12.8% mean gap.

The HCPC's median disability pay gap is 10.2%, indicating the midpoint difference in hourly pay between disabled and non-disabled employees. The median provides a clearer view of typical pay levels as it is not affected by extreme pay values, highlighting the disparity at the central point of the pay distribution.

# How do the HCPC's pay gaps compare with other organisations?

The vast majority of organisations have a gender pay gap, and the HCPC's pay gap compares favourably with that of other organisations. In 2023 to 2024 reporting year, around 11,023 UK employers had published their gender pay gap report on the government's gender pay gap reporting website. In April 2024, the average mean gender pay gap was 13.8% and the average median gender pay gap was 13.1%.

We have chosen to compare ourselves with similar organisations such as General Pharmaceutical Council (GPhC) and Nursing and Midwifery Council (NMC) who have also participated in reporting and already published their figures. We will continue to assess our gaps with similar organisations as publication of their figures takes place. Some of our fellow regulators fall below the mandatory staffing numbers and therefore do not report their gender pay gap.

	HCPC	UK average <sup>2</sup>	GPhC	NMC <sup>3</sup>
<b>Mean</b>	16.5%	13.8%	12%	8.1%
<b>Median</b>	13.4%	13.1%	13%	14.6%

## Ethnicity pay gap

	HCPC	NMC <sup>4</sup>
<b>Mean</b>	28.0%	27.5%
<b>Median</b>	21.1%	39.7%

## Disability pay gap

	HCPC	NMC <sup>5</sup>
<b>Mean</b>	12.8%	-6.1%
<b>Median</b>	10.2%	-7.8%

*\*Figures published in April 2024*

<sup>2</sup> Estimates for 2024 data are provisional. Source: Annual Survey of Hours and Earnings (ASHE) from the Office for National Statistics

<sup>3</sup> NMC have not yet published their 2024 figures. The figures stated are for 2023.

<sup>4</sup> NMC have not yet published their 2024 figures. The figures stated are for 2023.

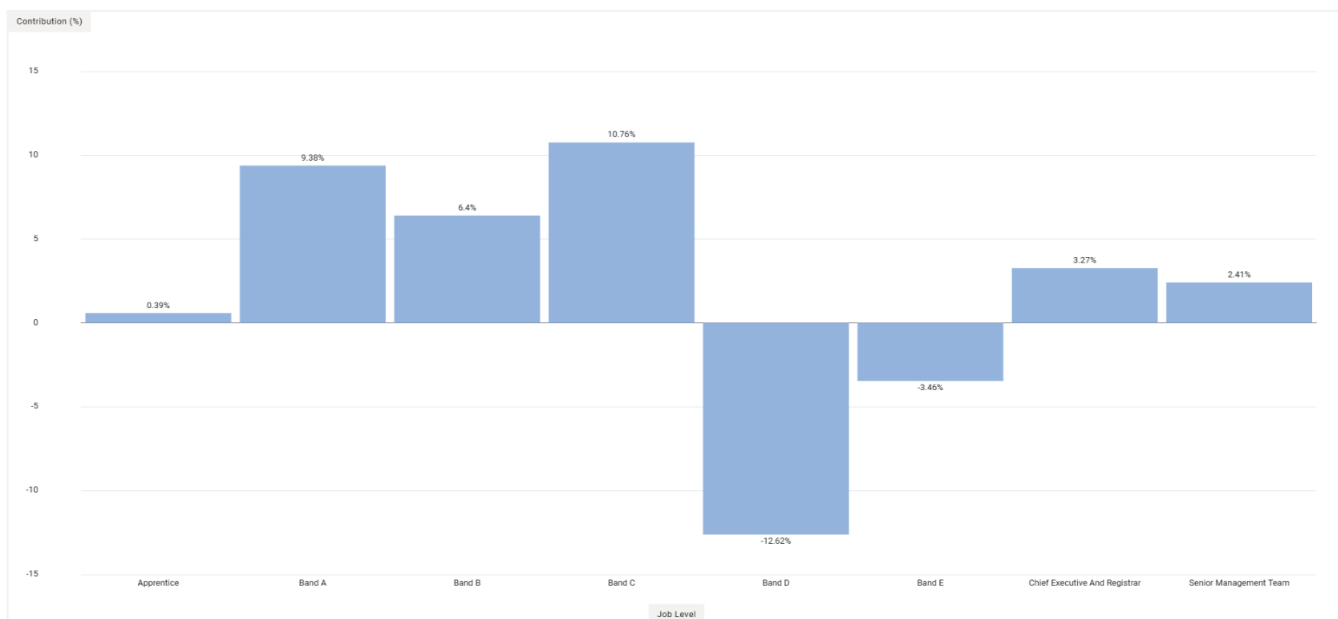
<sup>5</sup> NMC have not yet published their 2024 figures. The figures stated are for 2023.

# Contribution of gender, ethnicity and disability pay gaps across pay bands

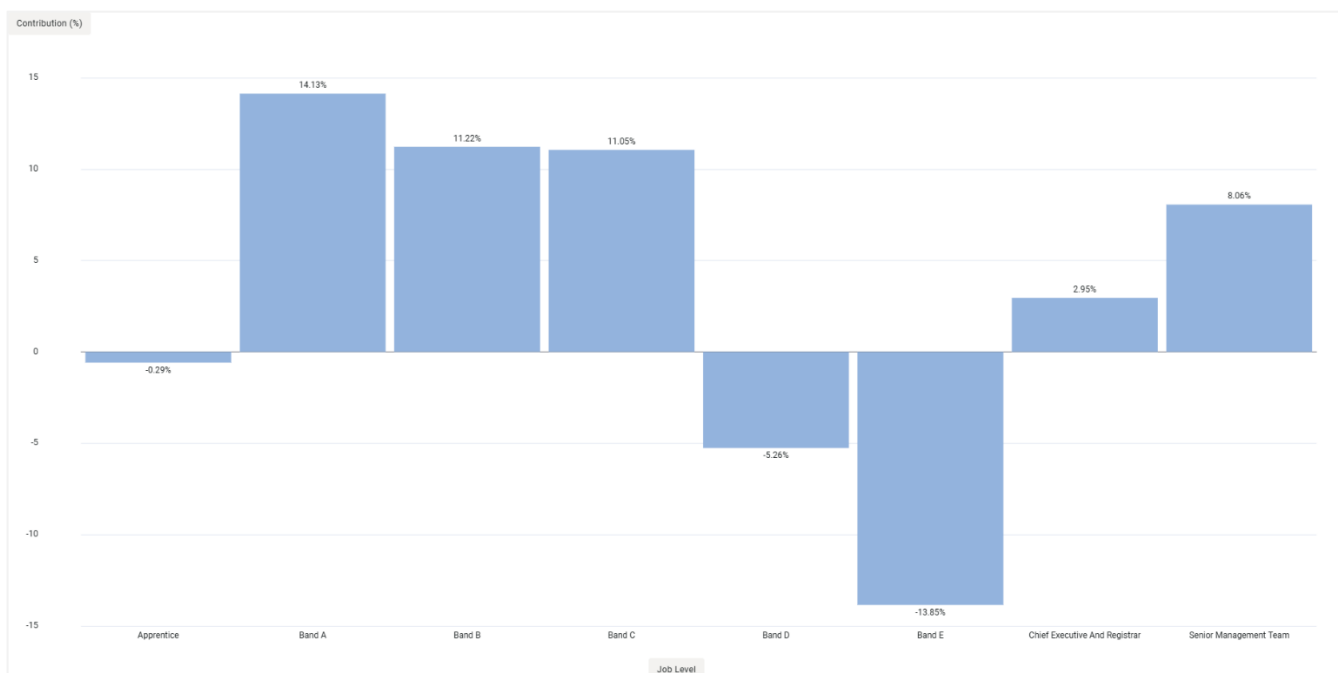
The charts below show the contribution of each pay gaps of HCPC colleagues in each of our internal pay bands.

At the HCPC, the internal banding system ranges from Band E, which is our lowest paid band, to the Chief Executive and Registrar band, which is our highest paid band.

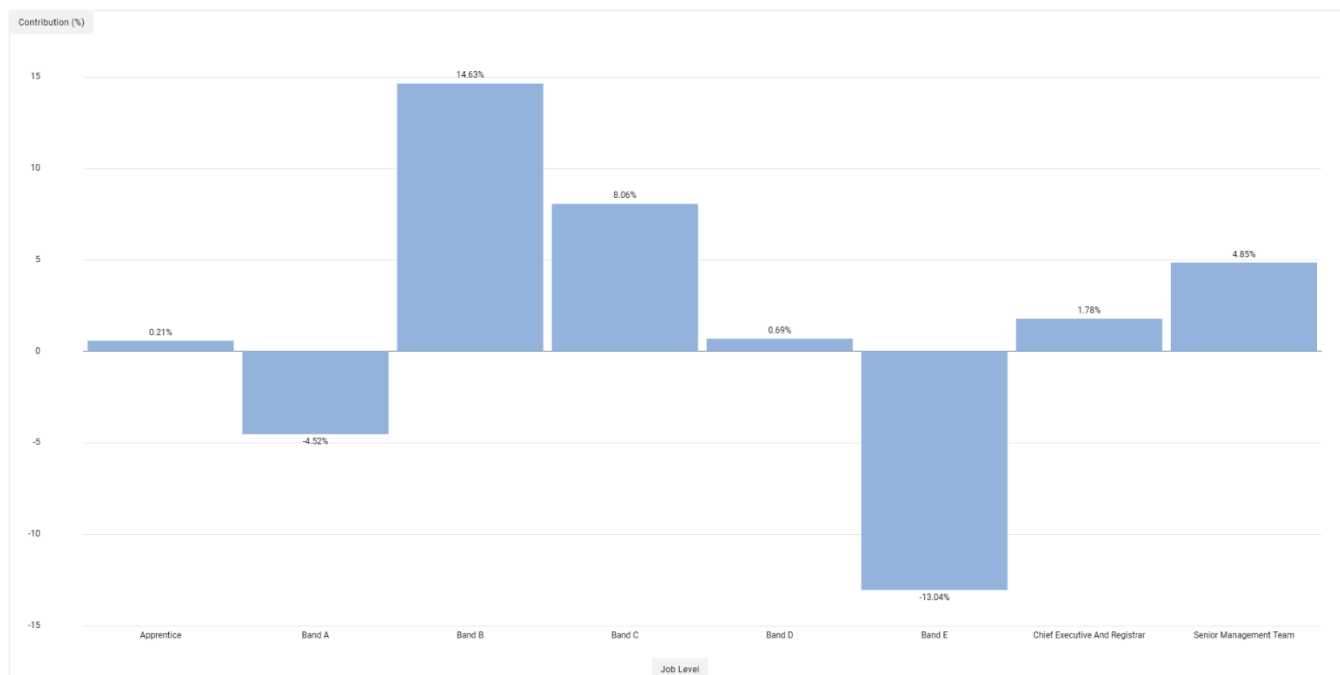
## Gender pay gap - All employees



## Ethnicity pay gap



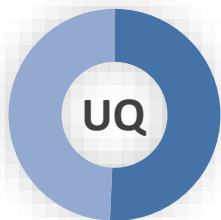
## Disability pay gap



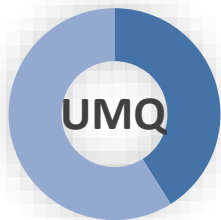
# Workforce gender – pay quartiles

The composition of our workforce is 61 percent women and 39 percent men<sup>6</sup>.

Changes in the quartiles compared to 2023:



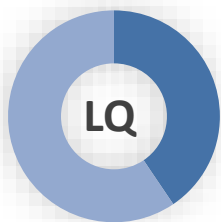
**Male 51%**  
**Female 49%**



**Male 41%**  
**Female 59%**



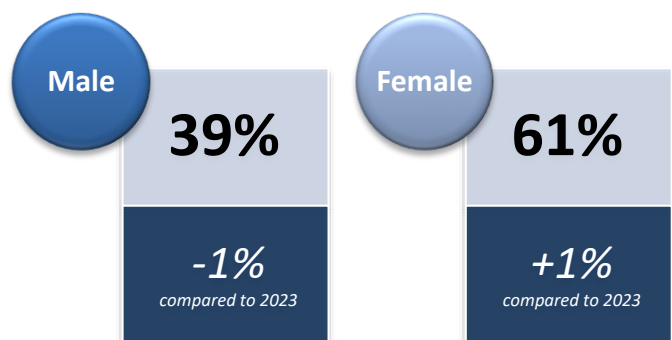
**Male 25%**  
**Female 75%**



**Male 41%**  
**Female 59%**

Upper Quartile	<b>7%</b>	decrease in men; increase in women
Upper Middle Quartile	<b>0%</b>	No change
Lower Middle Quartile	<b>1%</b>	decrease in men; increase in women
Lower Quartile	<b>4%</b>	increase in men; decrease in women

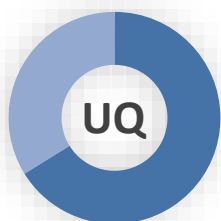
The proportion of female employees working at the HCPC has slightly increased compared to 2023:



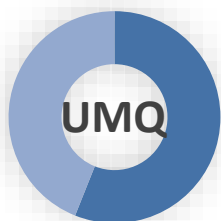
<sup>6</sup> We recognise that the requested data collection for statutory reporting purposes is binary, and that this does not reflect the identity of some of our colleagues. We are working to ensure our processes and policies are fully inclusive of trans and non-binary people and acknowledge that the nature of this report as a pay gap report to compare men and women may limit our understanding of pay gaps in relation to some trans and non-binary people. We have committed to disaggregating and cross-referencing this data further.

# Workforce ethnicity – pay quartiles

The composition of our workforce is 45 percent white and 55 percent ethnic minority employees.



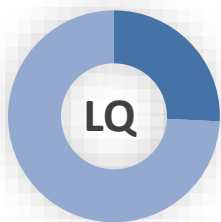
**White 66%**  
**Ethnic minority 34%**



**White 56%**  
**Ethnic minority 44%**



**White 33%**  
**Ethnic minority 67%**

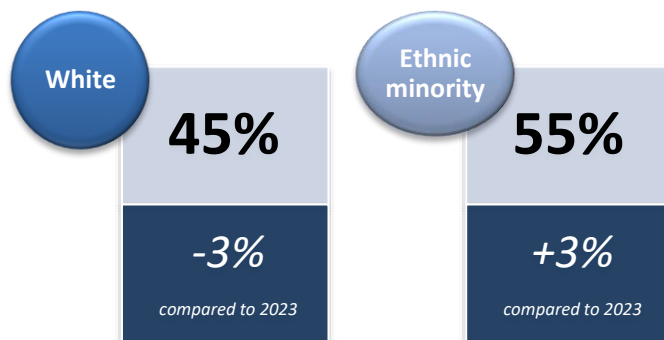


**White 26%**  
**Ethnic minority 74%**

Changes in the quartiles compared to 2023:

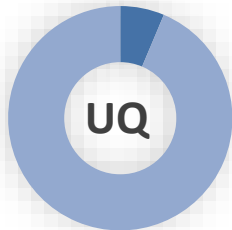
Upper Quartile	<b>7%</b>	decrease in white; increase in ethnic minority
Upper Middle Quartile	<b>5%</b>	decrease in white; increase in ethnic minority
Lower Middle Quartile	<b>4%</b>	increase in white; decrease in ethnic minority
Lower Quartile	<b>3%</b>	decrease in white; increase in ethnic minority

The proportion of ethnic minority employees working at the HCPC has slightly increased compared to 2023:

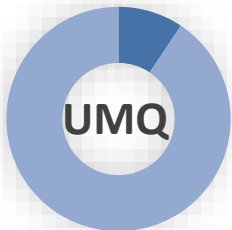


# Workforce disability – pay quartiles

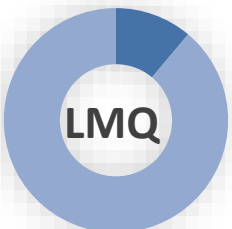
The composition of our workforce is 10 percent disabled and 90 percent non-disabled employees.



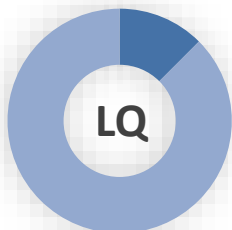
**Disabled 6%**  
**Non-disabled 94%**



**Disabled 9%**  
**Non-disabled 91%**



**Disabled 11%**  
**Non-disabled 89%**



**Disabled 12%**  
**Non-disabled 88%**

These graphs show the difference in the actual proportion of disabled and non-disabled employees within the separate pay quartiles.

Looking at representation can give insights into where important imbalance lies. It is also important as comparing this with the pay gap data shows how many people are affected by the largest gaps.



1 in 6 disabled employees are high earners (upper quartile).



1 in 3 disabled employees are low earners (lower quartile).

# What is the HCPC doing to address its pay gaps?

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We acknowledge the necessity for substantive measures to address our pay gaps. Our efforts in this regard are built upon robust foundations established through both our people strategy and EDI strategy. While these strategies adopt a holistic approach, they delineate specific actions geared toward making notable strides, particularly in the areas of gender and ethnicity. These actions are directly aligned with our commitment to addressing gender and ethnicity pay gaps. Recognising that progress is a gradual process, we have outlined a series of actions that we anticipate will positively influence the recruitment, progression, and retention of colleagues from under-represented groups over an extended period.

## Initiatives we have already been implemented

- Continued promotion of hybrid working and flexible working in all campaigns to enhance our appeal as an employer and offer a better work-life balance. Amendments to our flexible working policy now support day-one applications for flexible working, potentially enhancing our employer brand and attracting more diverse talent.
- Mandated online unconscious bias training for all recruiting managers to mitigate bias in recruitment processes.
- Delivered mandatory bias training and the HR Essential programme to all recruiting managers to minimise bias in recruitment.
- Maintained a compensation strategy that exceeds the voluntary 'real' living wage and externally benchmark all salaries to ensure fairness and competitiveness.
- Continued to provide recruiting managers with anonymised applications to minimise unconscious bias in decision-making.
- Conducted training for newer staff members participating in shortlisting or interview panels for the first time.
- Mandated EDI training for all employees.
- Introduced a new careers website which is more accessible and appealing to a diverse range of applicants.
- Established an internal EDI employee representative group and an employee forum.
- Recruited for roles focused on EDI, stakeholder engagement and wellbeing to strengthen our EDI commitments organisation-wide.
- Launched the Aspiring to Management Programme, Management Development programme and the Senior Leadership Management programme which focuses on enhancing leadership and management capabilities across different levels of the organisation.
- Developed a menopause policy and trained all managers on how to support employees going through menopause.



## Action plan for the financial year 2025-2026

- Enhance our employer brand and values through various initiatives targeting increased diversity, widening our applicant pool and collaborating with career fairs and local communities.
- Introduce more values-based questions and skill-based assessments to assess suitability for roles and reduce unconscious bias.
- Review and improve our recruitment and progression of under-represented employees.
- Continue to use skills-based assessment tasks in recruitment.
- Continue to have diverse selection panels.
- Review our advertisements and ensure all campaigns are advertised in a gender-neutral way. Continue to conduct structured interviews where all candidates are asked the same questions in a predetermined order and format.
- Understand and learn from employee feedback gathered through pulse surveys, exit interviews, etc., to inform targeted interventions.
- Provide ongoing training for managers to understand and address implicit bias and to recognise and challenge micro-aggressions in the workplace.
- Review and assess the requirements necessary to increase recruitment or progression into higher-paying roles.
- Continue to promote a fair and transparent pay award process and communicate clearly how our pay policy is applied.
- As a disability confident employer, enhance our communication in recruitment adverts to attract more disabled candidates.

While acknowledging that none of the implemented measures will lead to an immediate reduction in the pay gaps, the HCPC remains steadfast in its commitment to the cause. Recognising the time required for a significant impact, which may span several years, the HCPC is unwavering in its dedication to ongoing pay gap reporting. The commitment extends to regular reviews, ensuring transparency and accountability. Concurrently, the organisation remains vigilant in the continuous evaluation and enhancement of its action plan, affirming its pledge to address and rectify pay disparities. This sustained commitment underscores the HCPC's enduring pursuit of equity and inclusivity in the workplace.

*April 2025*

