



The Dudley Group
NHS Foundation Trust

Disability Pay Gap Report 2025/26

The Dudley Group NHS Foundation Trust

(Snapshot of March 2025)

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1. Disability Pay Gap Overview 2025

Our 2025 Disability Pay Gap analysis shows a mean gap of 4.9% and a median gap of 1%, indicating a slight difference in average earnings between disabled and non-disabled colleagues. With 6.4% of our workforce declaring a disability and 26% recorded as unknown, representation across pay levels remains relatively balanced, though improving data declaration rates is key to deepening our understanding.

The findings suggest that differences largely reflect role distribution rather than unequal pay, but we remain focused on driving equity and inclusion across all areas of the Trust. Over the coming year, we will improve data quality, analyse career progression pathways for disabled colleagues, and expand access to leadership and development opportunities. We will also continue to publish annual pay gap reports, overlaying gender, ethnicity, and disability data to provide a richer, intersectional picture of pay equity and ensure that every colleague has fair access to opportunity and reward.

2. Introduction

We recognise the clear moral and ethical responsibility to ensure fair and equitable pay across all groups within our workforce. For the first year, we have voluntarily chosen to publish our disability pay gap data, which is an essential step in identifying where inequalities may exist.

In addition to reporting on disability, this year we will overlay and analyse our pay gap findings across gender, ethnicity, and disability, enabling a deeper understanding of how different characteristics may intersect and influence pay outcomes. This approach will help us identify any shared or unique factors driving disparities and guide targeted, evidence-based actions.

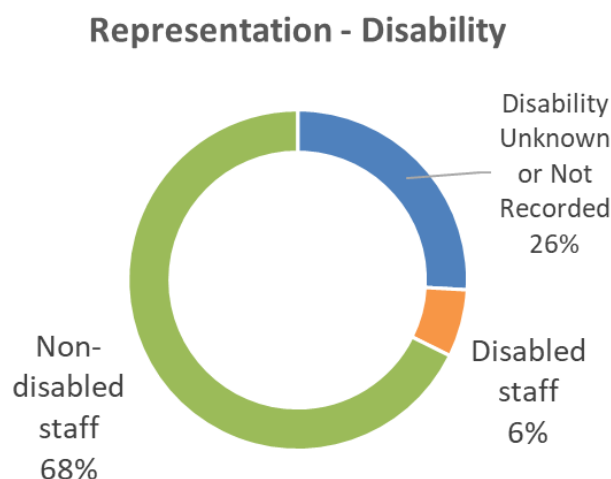
By reporting on our disability pay gap, we aim to strengthen our understanding of any disparities, enabling us to analyse the findings in depth and develop meaningful action plans. This commitment supports our ongoing efforts to address pay gaps, tackle inequalities, and foster a more inclusive workplace for all colleagues.

The report is based on the Chartered Institute of Personnel and Development (CIPD) 2023 guide for calculating and publishing an annual pay gap report for relevant employees of The Dudley Group NHS Foundation Trust (The Dudley Group):

[Disability workforce reporting | CIPD](#)

The Dudley Group NHS Foundation Trust employed 6,300 people, of whom 6.4% have a disability, while 26% of employees are recorded as unknown or not disclosed.

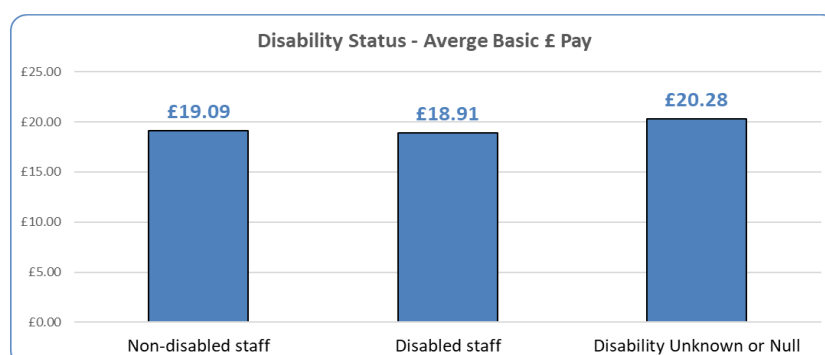
This limits the accuracy of comparisons and may mask underlying trends, reinforcing the importance of improving declaration rates over time.



3. What is our Disability pay gap?

As of March 2025, we are publishing our first disability pay gap report. This represents a significant step in building transparency and enhancing our understanding of how pay varies across our workforce.

The analysis shows a disability pay gap of 4.9% (mean) and 1% (median). Based on the available data, disabled colleagues earn, on average, £1.07 less per hour (mean) and £0.19 less per hour (median) compared to non-disabled colleagues. In hourly terms, employees with a disability earn a median rate of £18.91 and a mean rate of £20.73, compared with £19.09 (median) and £21.79 (mean) for employees without a disability.



The mean disability pay gap of 4.9% indicates that, on average, disabled colleagues earn slightly less than non-disabled colleagues. This is broadly in line with national benchmarks, where disability pay gaps typically range between 4% and 6%. While

the gap is relatively small, it highlights the importance of continuing to promote inclusion and equal opportunities for progression across all roles. We remain committed to understanding the underlying factors that contribute to this difference and to taking meaningful action to ensure equity in pay and career outcomes.

We also acknowledge that disability status is unknown or not recorded for 26% of staff, which limits the depth of insight. Despite this, the analysis shows that while average pay is broadly consistent overall, there is some variation when the data is broken down by gender.

As this is our first report, the findings provide a valuable baseline for future monitoring. Importantly, the results do not suggest unequal pay for equal work, such circumstances would represent an equal pay issue, which this analysis does not cover.

This first analysis indicates that the disability pay gap reflects patterns of representation across job roles and pay bands, rather than systemic disadvantage. As we advance, we are committed to using this baseline to track progress, improve accessibility, support career development, and ensure fair opportunities for all colleagues.

The following pages set out the analysis of the pay gap, any drivers for the disability pay gap and any areas of unequal representation.

4. What is our bonus disability pay gap?

The Dudley Group does not have a disability bonus pay gap, as bonus payments are not applicable under current NHS terms and conditions.

5. What is the proportion of disabled staff and non-disabled staff in the highest and lowest-paid staff groups?

Overall representation across the staff groups is 6.4% disabled and 26% unknown. Splitting the average ordinary pay suggests disabled staff are slightly more represented in lower pay quartiles, though the difference is marginal:

The Highest-paid staff group contains:

8% of all disabled employees

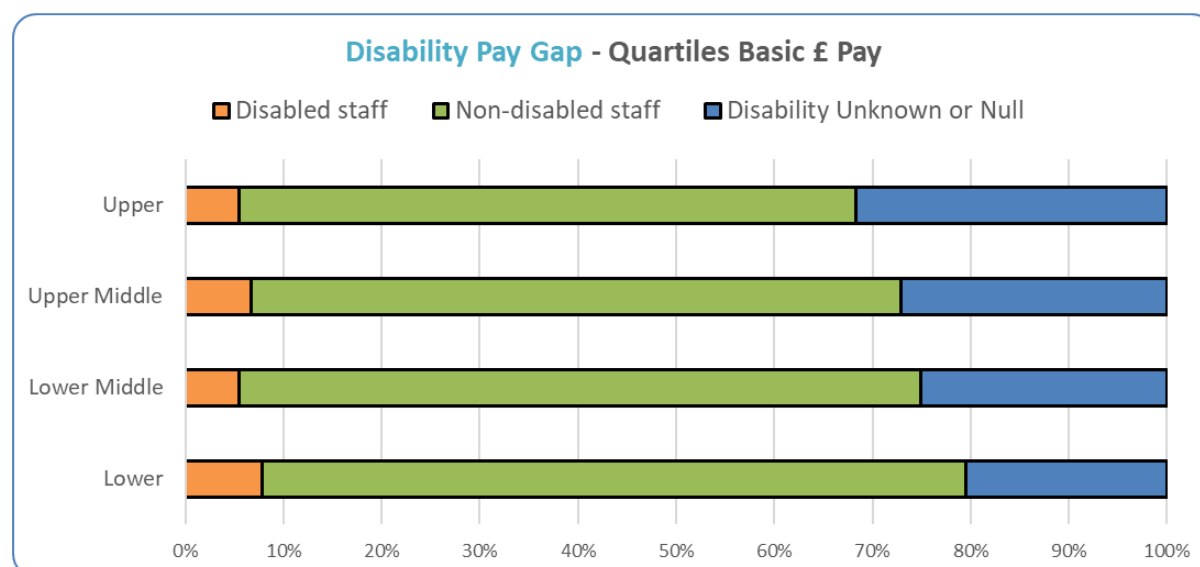
92% of all non-disabled employees

The lowest-paid staff group contains:

10% of all disabled employees

90% of all non-disabled employees

The graphic below shows the proportions of disabled and non-disabled in the lower, lower middle, upper middle, and upper quartiles:



Analysis of pay quartiles indicates a slight variance in the distribution of disabled and non-disabled employees between the lower and higher pay bands.

Disabled employees make up 8% of the highest-paid staff group and 10% of the lowest-paid staff group, suggesting relatively balanced representation across pay levels. However, the higher proportion of unknown declarations limits the ability to draw firm conclusions about potential pay disparities.

Overall, the findings suggest there is no clear indication of disadvantage for disabled employees in relation to pay. However, continued monitoring and efforts to encourage disclosure would support a more accurate understanding of disability representation and progression across the Trust.

6. Addressing any disability pay gaps

Reducing the disability pay gap remains a key priority in our commitment to equity and inclusion. Our first analysis highlights a small pay gap between disabled and non-disabled colleagues. This reflects representation across different roles and pay bands, rather than unequal pay for equal work.

We recognise that a truly inclusive organisation ensures equitable access to opportunity, progression, and reward for all colleagues, regardless of disability. Our approach is focused on driving systemic change across the employee lifecycle, including recruitment, career development, retention, and leadership.

A critical factor in addressing the disability pay gap is the quality of our data.

Currently, disability status is unknown or not recorded for 26% of staff, which limits the depth of insight. To address this, we have run targeted campaigns to encourage staff to update their equality information, highlighting why accurate data matters and how it enables us to take meaningful action. Improving data quality remains a priority, as it will allow us to identify trends with greater confidence and develop more targeted interventions.

Over recent years, we have taken meaningful steps to reduce pay gaps and improve representation across staff groups, including:

- Conducting annual analysis of gender and ethnicity pay data to identify trends and shape targeted interventions, with disability data now incorporated for the first time.
- Running targeted campaigns to improve data quality and encourage disability disclosure, strengthening the accuracy of our reporting.
- Promoting inclusive policies such as Flexible Working, Hybrid Working, and our Reasonable Adjustment Passport to improve accessibility and work–life balance.
- Launching a talent working group to support progression pathways for all staff, with a focus on underrepresented groups.
- Strengthening recruitment and retention practices, including monitoring retention rates across diverse staff groups.
- Facilitating lived experience conversations to ensure the voices of colleagues with disabilities inform action planning.
- Expanding inclusive recruitment and talent management practices through training and new toolkits.

We propose to take further action in 2025/26 to reduce our disability pay gap:

No.	Action	When	Re-viewed
1	Continue targeted campaigns to improve disability data quality by encouraging staff disclosure, aiming to reduce the 26% unknown/not recorded rate. Stronger data will increase the accuracy of analysis and enable more focused actions.	Q3 2026	Quarterly
2	Undertake focused analysis of career progression pathways for disabled colleagues to identify barriers to advancement. This will combine workforce data with staff feedback gathered through surveys and focus groups, with the aim of identifying at least three key barriers and creating a targeted action plan.	By May 2026	Quarterly
3	Expand access to leadership and development programmes to support progression of disabled colleagues. This will include tailored outreach and support, with a goal	By June 2026	Quarterly

	of achieving at least 10% representation of disabled colleagues in leadership programmes to promote equitable access to senior roles.		
4	Continue to publish annual disability pay gap reports, incorporating year-on-year comparisons and progress against targets. To strengthen analysis, future analysis will overlay gender and ethnicity data for an intersectional understanding of pay equity.	November 2026	Annually

7. Definitions, assumptions, and scope

This report contains all employee data extracted from the Dudley Group Electronic Staff Record system (ESR) snapshot as of 31 March 2025. Therefore, the reporting period covers 2025/2026.

The hourly rate is calculated using base pay, allowances, and bonus pay (where applicable).

Table 1 – Definitions	
Pay Gap	Difference in pay between groups.
Mean Gap	Difference between the mean (1) hourly rate for disabled and non-disabled employees.
Median Gap	Difference between the median (2) hourly pay rate for disabled and non-disabled employees.
Quartile proportions	Proportions of disabled and non-disabled in the lower, lower middle, upper middle, and upper quartiles (3) pay bands.
Equal pay	Being paid equally for the same/similar work.

(1) Mean the sum of the values divided by the number of values.

(2) Median is the middle value in a sorted list of values. For example, it is the middle value of the pay distribution, such that 50% of people earn more than this and 50% earn less than the median.

(3) Quartile is the value that divides a list of numbers into quarters.