



6th February 2021

Equality Human Rights Commission,  
Fleetbank House,  
2-6 Salisbury Square,  
London,  
EC4Y 8JX

Dear Sir/Madam,

We write to you as the Coalition of Race Equality Organisations (CORE), to respond to your inquiry into racial inequality in healthcare workplaces, and address a number of underlying factors which we believe are contributing to ethnic disparities within the sector. In principle, we welcome the inquiry, however as a collective, we have concerns regarding the EHRC's approach to this, including its lack of consultation with BAME community groups. We believe that the EHRC's track record to date in relation to the race agenda has often been ineffective, but we hope that we can work in partnership, in terms of developing recommendations as a result of this inquiry's outcome.

In the NHS, the issue of racism persists, almost six years after the introduction of the Workforce Race Equality Standard (WRES), which has the goal of promoting equal access to career opportunities and fair treatment for staff from Black, Asian and Minority Ethnic backgrounds. In spite of the WRES, and other such initiatives including the Breaking Through and Ready Now programmes, BAME staff who constitute 22.9%<sup>1</sup> of the NHS workforce

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<sup>1</sup> Ethnicity-facts-figures.service.gov.uk. *NHS workforce*. [online] Available at: <<https://www.ethnicity-facts-figures.service.gov.uk/workforce-and-business/workforce-diversity/nhs-workforce/latest#:~:text=White%20people%20made%20up%20a,and%205.2%25%20of%20medical%20staff>>

nationally and 43.9%<sup>2</sup> in London, continue to face systemic discrimination and structural barriers in comparison to their White counterparts.

In the 2019 WRES for example, 15% of BAME staff reported having been personally discriminated against by a manager, team leader or other colleague, nearly three times the rate reported by White staff. Additionally, 30% of BAME staff reported facing bullying or abuse from patients or members of the public.<sup>3</sup> In relation to recruitment, BAME staff are nearly 1.46 times less likely to be appointed to roles from shortlisting, and in terms of disciplinary procedures they are 1.22 times more likely to enter the formal process.<sup>4</sup>

Staff from BAME backgrounds are also concentrated in lower pay grades, and are four times less likely to be in senior roles than White colleagues.<sup>5</sup> This can be demonstrated by the fact that out of a total of 2,115 NHS roles that fall under salary band 8c (>£56,000), just 170 are held by BAME staff.<sup>6</sup> At the London North West University Healthcare Trust for example, 76% of nurses are BAME, but only a quarter are within this pay grade.<sup>7</sup> This lack of representation is reflected across the UK, with Manchester University NHS Trust having just five BAME staff in its most senior forty nursing jobs, and Leeds Teaching Hospital, where BAME nurses (which account for 20% of all nurses at the hospital) have no representation amongst the 25 most senior nursing roles.<sup>8</sup>

There is also an ethnicity pay gap between BAME staff and their White counterparts. In research conducted by St George's University Hospitals NHS Foundation Trust in 2018, there was a mean and median hourly pay gap in

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<sup>2</sup> Randhawa, M., *Closing the gap on BME representation in NHS leadership: not rocket science*. [online] The King's Fund. Available at: <<https://www.kingsfund.org.uk/blog/2018/03/bme-representation-nhs-leadership>>

<sup>3</sup> People Management. *Third of BAME NHS staff have been bullied by colleagues, report finds*. [online] Available at: <<https://www.peoplemanagement.co.uk/news/articles/third-of-bame-nhs-staff-have-been-bullied-by-colleagues>>

<sup>4</sup> Pulse Today. *White candidates still more likely to be appointed to NHS jobs than BME applicants*. [online] Available at: <<https://www.pulsetoday.co.uk/news/uncategorised/white-candidates-still-more-likely-to-be-appointed-to-nhs-jobs-than-bme-applicants/#:~:text=In%202019%2C%20white%20staff%20were,disciplinary%20process%20than%20white%20staff.>>>

<sup>5</sup> Davis, M. *BAME nurses four times less likely to be in senior roles than white colleagues*. [online] Mirror. Available at: <<https://www.mirror.co.uk/news/politics/bame-nurses-four-times-less-23291104>>

<sup>6</sup> As above

<sup>7</sup> As above

<sup>8</sup> As above

favour of White staff, of 11.04% and 5.77% respectively.<sup>9</sup> In relation to consultants nationally, the median pay gap for White consultants is 3.5% higher than Black consultants, 4.3% higher than Asian consultants, and 6.2% higher than Mixed heritage consultants.<sup>10</sup> In conjunction with receiving lower pay, BAME doctors also have higher rates of complaints made against them, and BAME trainees are more likely to fail their MRCGP Clinical Skills Assessment (CSA) – with a 63.2% pass rate compared with 75.8% for White British trainees.<sup>11</sup>

In relation to the COVID-19 pandemic, BAME doctors and healthcare workers have also been disproportionately impacted in terms of lack of PPE, higher infection rates and higher death rates. Additionally, workers from BAME backgrounds have continued to face higher rates of bullying and harassment and reported feeling less confident with regard to appropriate judgements being made to mitigate risk, and reporting PPE shortages.<sup>12</sup>

In order to address the issues outlined above, we recommend the following actions:

- include BAME staff network members in working groups relating to the disciplinary process, in order to identify and mitigate causes of disproportionality
- greater BAME representation on recruitment panels and a robust scoring methodology for interview processes
- greater availability of secondment opportunities to BAME staff in order to enhance career progression
- board level commitment to attracting and recruiting BAME staff to more senior roles
- greater transparency regarding pay differences by ethnicity
- comprehensive risk assessments for all staff
- reverse mentoring to give board and senior staff opportunities to be shadowed by BAME staff

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<sup>9</sup> St George's University Hospitals. *Ethnicity Pay Gap 2017/18*. [online] Available at: <<https://www.stgeorges.nhs.uk/wp-content/uploads/2019/03/Ethnicity-Pay-Gap-2017-18-v2.pdf>>.

<sup>10</sup> The Nuffield Trust. *What is the ethnicity pay gap among NHS doctors?*. [online] Available at: <<https://www.nuffieldtrust.org.uk/news-item/what-is-the-ethnicity-pay-gap-among-nhs-doctors>>

<sup>11</sup> CoGPED.org.uk. *Differential Attainment Seminar*. [online] Available at: <[https://www.cogped.org.uk/images/docs/publications/Differential\\_Attainment\\_Seminar\\_Report.pdf](https://www.cogped.org.uk/images/docs/publications/Differential_Attainment_Seminar_Report.pdf)>

<sup>12</sup> British Medical Association. *COVID-19: the risk to BAME doctors*. [online] Available at: <<https://www.bma.org.uk/advice-and-support/covid-19/your-health/covid-19-the-risk-to-bame-doctors>>

- resourcing for BAME staff networks and protected time for staff to attend meetings and have a safe space to support one another.

We also urge the EHRC to engage with healthcare staff, and undertake extensive community consultation similar to the series of engagements led by Prof Kevin Fenton in the first wave of the COVID-19 pandemic.<sup>13</sup> We are encouraged that the EHRC has agreed to undertake focus group sessions with the NHS BME Network, for its members who meet the criteria for the inquiry. As CORE we request that we are invited to any future advisory steering groups, to ensure outcomes from this inquiry can be implemented effectively.

We look forward to your response.

Yours sincerely,

Coalition of Race Equality Organisations (CORE)

**CORE, the Coalition of Race Equality Organisations, is comprised of a number of the leading organisations within the UK Black and Minority Ethnic (BAME), voluntary and community sector. CORE acts as a collective voice to lobby government, influence policy, and raise awareness of issues of inequality that permeate society. Priority areas include housing, health, criminal justice, education, employment, and political engagement and representation.**

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<sup>13</sup> Public Health England. *Beyond the data: Understanding the impact of COVID-19 on BAME groups*. [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/892376/COVID\\_stakeholder\\_engagement\\_synthesis\\_beyond\\_the\\_data.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892376/COVID_stakeholder_engagement_synthesis_beyond_the_data.pdf)

**CORE's membership is outlined below:**

- **Alliance for Inclusive Education**
- **Black Training and Enterprise Group**
- **Black South West Network**
- **Blacksox**
- **BME National**
- **BRAP**
- **Caribbean and African Health Network**
- **Council of Somali Organisations**
- **Croydon BME Forum**
- **Friends, Families and Travellers**
- **Greater Manchester BAME Network**
- **JCORE**
- **Lancashire BME Network**
- **Migrants' Rights Network**
- **NHS BME Network**
- **OLMEC**
- **Operation Black Vote**
- **Positive Action in Housing**
- **Race on the Agenda**
- **Race Equality Foundation**
- **Race Equality Matters**
- **Runnymede Trust**
- **South Asian Health Action**
- **Steering Group for London Race Equality Councils**
- **The Traveller Movement**
- **UKREN**
- **Voice4Change England**

British Medical Association. *COVID-19: the risk to BAME doctors*. [online] Available at: <<https://www.bma.org.uk/advice-and-support/covid-19/your-health/covid-19-the-risk-to-bame-doctors>>

CoGPED.org.uk. *Differential Attainment Seminar*. [online] Available at: <[https://www.cogped.org.uk/images/docs/publications/Differential\\_Attainment\\_Seminar\\_Report.pdf](https://www.cogped.org.uk/images/docs/publications/Differential_Attainment_Seminar_Report.pdf)> =

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St George's NHS, [online] Available at: <<https://www.stgeorges.nhs.uk/wp-content/uploads/2019/03/Ethnicity-Pay-Gap-2017-18-v2.pdf>> [Accessed 7 February 2021].

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