

# Ethnicity Pay Gap Report

1 April 2022 to 31 March 2023

© Crown copyright 2023

You may reuse this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence.

To view this licence, visit [www.nationalarchives.gov.uk/doc/open-government-licence/](http://www.nationalarchives.gov.uk/doc/open-government-licence/) or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: [psi@nationalarchives.gov.uk](mailto:psi@nationalarchives.gov.uk).

## Foreword

The CMA is committed to being a diverse and inclusive employer, with a breadth of experience, knowledge and outlook that is representative of the communities we serve. We believe that by making all our colleagues feel welcome and included, they will deliver the best possible outcomes for the benefit of people, businesses and the UK economy. We have an ambitious [Equality, Diversity and Inclusion Strategy 2020 – 2024](#) and Action Plan that support our aim to be a great employer that values and welcomes the different ideas, skills and experiences of our colleagues.

We have chosen to take a proactive approach to voluntarily report our ethnicity pay gaps in order to build stronger relationships with our workforce and beyond through openness and transparency. Our Ethnicity Pay Gap Report 2022 - 2023 gives us an indication of how we are living up to our commitments and helps us understand where we need to make changes for the future.

This year we have seen positive changes in some of the pay gap measures compared with 2021 - 2022, but in other measures the pay gaps have increased. This is not acceptable for us, and we are determined to reduce our ethnicity pay gap. The primary factor that contributes to our ethnicity pay gap continues to be the underrepresentation of staff from ethnic minority backgrounds in our most senior grades and a higher representation in lower grades. Our actions to address the gaps are focussed on improving representation at all grades and we must do more to understand how we can attract, develop and retain staff to grow their careers within the CMA.

The CMA's Board and Executive Committee are committed to delivering these changes. In March 2023 we published our [Equality, Diversity and Inclusion Action Plan \(2023-2024\)](#) which sets out the ambitious programme of work to deliver our strategy, and to address our pay gaps. It focuses on five thematic areas:

- Recruitment and grow our own
- Career progression and development
- Improving representation
- Pay and reward
- Culture of inclusivity

While it is too soon to see the impact of these actions in this Ethnicity Pay Gap report, and indeed our plan includes some long-term initiatives that may take time to realise an impact on pay, we believe these actions will make the CMA a truly inclusive and representative place to work.

Sarah Cardell, Chief Executive, Amelia Fletcher, Non-Executive Director and Wellbeing, Equality Steering Group (WIDE) Chair

## Contents

Introduction .....	5
Context.....	5
Ethnicity Pay Gap Reporting .....	6
Ethnicity Profile of the CMA.....	9
Calculating the Ethnicity Pay Gap .....	10
Closing the Gap – Actions for the CMA.....	17
Declaration .....	18

## Introduction

1. The CMA is an independent non-ministerial UK Government department and is the UK's principal competition and consumer protection authority. We help people, businesses and the UK economy by promoting competitive markets and tackling unfair behaviour.
2. This report sets out the CMA's ethnicity pay gap at 31 March 2023 and how we plan to address the gap.

## Context

3. The background to racial disparity in the UK is well documented in a range of reviews and reports that outline the challenges and opportunities for employers in achieving workplace equality.
4. At the CMA, we have a clearly stated commitment to racial equality. As a signatory of the Race at Work Charter the publication of this Ethnicity Pay Gap reports fulfils our charter commitment to '*capture ethnicity data and publicise progress*'. The CMA is also a supporter of the Black Talent Charter.
5. Unlike gender pay gap reporting, ethnicity pay gap reporting is completed on a voluntary basis. Of those organisations that have published ethnicity pay gap data, there is a trend towards a concentration of staff from ethnic minorities in junior roles and an underrepresentation of these staff at senior levels. However, as reporting is currently voluntary, there is limited data available to allow us to compare ourselves to other organisations.
6. The CMA ethnicity pay gap is driven largely by similar challenges, as identified in the CMA's previous ethnicity pay gap reports. The low representation of staff from minority ethnic backgrounds at higher grades remains a significant issue for the CMA for many reasons, including being a substantial driver for our ethnicity pay gap figures. We have already put a range of measures in place to address underrepresentation at senior grades, particularly within the Senior Civil Servant (SCS) population.

## Ethnicity Pay Gap Reporting

### What is the Ethnicity Pay Gap?

7. The ethnicity pay gap shows the difference in the average pay between staff from minority ethnic backgrounds in a workforce, compared to white staff.
8. Where there is a positive percentage, this means that the average pay of a white member of staff is higher than that of a member of staff from an ethnic minority group. The higher the percentage, the greater the ethnicity pay gap. A negative percentage mean means that the average pay of the ethnic minority group is higher than that of the white group.
9. The ethnicity pay gap is different to equal pay. Ethnic pay disparities are not primarily about those from a white background and other ethnic groups being paid differently for the same job. The *Equality Act 2010* makes it unlawful to discriminate (both directly and indirectly) against employees because of their race. Therefore, unless there is a failure to comply with existing law, pay disparities between ethnic groups are likely to be due to other factors that impose a disadvantage on people from ethnic minorities without being explicitly discriminatory<sup>1</sup>.

### Development of Employer Guidance

10. In October 2018, the Department for Business, Energy and Industrial Strategy (BEIS) initiated an employer consultation on ethnicity pay gap reporting as part of the government response to the McGregor-Smith review on Race in the workplace.
11. In June 2020, the Commission on Race and Ethnic Disparities (CRED) was established by the UK government to investigate race and ethnic disparities in the UK. In April 2021, CRED made a set of recommendations on ethnicity pay gap reporting published in the [‘The report of the Commission on Race and Ethnic Disparities’](#).
12. In March 2022, the government [published a policy paper](#) in response to the CRED report. Within that wide-ranging document the government confirmed it would not be legislating for ethnicity pay gap reporting at that stage but had committed to “support employers across the UK who want to publish their ethnicity pay gaps” by publishing new guidance on voluntary ethnicity pay gap reporting.

---

<sup>1</sup> Ethnicity Pay Reporting, Government Consultation, BEIS, October 2018, pg. 12

13. On 17 April 2023, the Department for Business and Trade (DBT) published new guidance for employers outlining how to measure, report on and address any ethnicity pay differences within their workforce.

### **CMA Approach to Ethnicity Pay Gap Reporting**

14. In the absence of employer guidance, the CMA has taken the approach of aligning with the recommendations set out by CRED in 2021. As last year, this year's report presents outcomes for specific ethnic minority groups and broadly mirrors the new DBT guidance on collecting ethnicity data:
  - Black (including Black Caribbean, Black African and any other Black, Black British or Caribbean background)
  - Asian (including Indian, Pakistani, Bangladeshi, Chinese, and other Asian background)
  - Mixed (including any mix of the above categories, including white)
  - Other - This is where staff have disclosed that their ethnicity does not fall into the above categories or any of the white ethnic groups.
15. It is acknowledged that there may be differences in the outcomes between groups within the above categories (e.g. Indian and Chinese). However, due to the small sample sizes within these sub-groups at the CMA, the outcomes are reported within each of the above categories. In addition, where analysis by each ethnic minority group would break down data into small sample sizes (e.g. pay gap analysis by grade), outcomes have been reported overall as 'all ethnic minorities'.
16. The new guidance recommends that employers present and consider a range of calculations broken down by ethnicity categories including:
  - i. pay quarters that measure the representation of employees in different ethnic groups at different levels of pay in an organisation
  - ii. representation of ethnic groups across the organisation as a whole
  - iii. mean and median pay gaps that measure the difference between average earnings and bonuses in an organisation for different groups
  - iv. proportion of employees that did not disclose their ethnicity when asked by their employer



17. These measures broadly mirror the measures used in last year's report which also link to the measures applied for Gender Pay Gap reporting<sup>2</sup>, and the methods of calculation, but applied through a lens of ethnicity (where outcomes for ethnic minority groups are compared against white ethnic groups). Therefore, the pay measures contained in this report are:
- i. representation of ethnic groups across the CMA, including the proportion of staff who have not disclosed their ethnic group
  - ii. the mean and median ethnicity pay gaps for each ethnic minority group, compared against white ethnic groups;
  - iii. the mean and median ethnicity bonus gaps for each ethnic minority group, compared against white ethnic groups;
  - iv. the proportion of each ethnic group who received bonuses; and
  - v. the proportion of employees in each pay quartile for each ethnic group.

---

<sup>2</sup>The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017

## Ethnicity Profile of the CMA

18. At 31 March 2023, the CMA had a total of 882 staff in the UK with 16 staff based in Belfast, 11 in Cardiff, 3 in Darlington, 68 in Edinburgh, 768 in London and 16 in Manchester. This is the number of staff deemed to be ‘full pay relevant’; those employees who are not being paid or are on reduced, statutory or no pay during March 2023 are excluded as they are not ‘full pay relevant’ employees.
19. The ethnicity profile of full pay relevant CMA staff at 31 March 2023 is below:

**Figure 1: CMA Ethnicity Profile by grade as of 31 March 2023**

Grade	All Staff	White	Black	Asian	Mixed	Other	All ethnic minorities	Not reportable <sup>3</sup>
AO	26	55.9%	8.2%	23.2%	7.2%	0.7%	39.2%	4.9%
EO	59							
HEO	154							
SEO	67							
G7	238	72.4%	3.5%	10.6%	3.1%	1.1%	18.3%	9.3%
G6	215							
SCS PB1	98	85.4%					5.7%*	8.9%
SCS PB2 / PB3	25							
<b>% of all staff</b>	<b>882</b>	<b>68.5%</b>	<b>4.6%</b>	<b>14.1%</b>	<b>4.1%</b>	<b>1.0%</b>	<b>23.8%</b>	<b>7.7%</b>

*\*The profile of ethnic minority staff at SCS grades has been combined to avoid disclosure of individual ethnic backgrounds, due to small population sizes.*

20. We know that there is higher representation of staff from ethnic minority backgrounds at junior grades, as well as lower representation of these staff at senior grades relative to the overall CMA population.
21. In particular, we consider the low proportion of staff from ethnic minorities in the SCS to be unacceptable and this is a continued priority focus for the CMA Board and Senior Executive Team. Our ambition is that the organisational diversity of the CMA at all levels should reflect that of the UK public and the

<sup>3</sup> This covers all full pay relevant employees who have chosen the ‘Prefer not to say’ option or who have not disclosed their ethnicity.

consumers we serve, and we will take all possible steps to achieve this ambition.

22. It should be highlighted that the proportion of staff from ethnic minority backgrounds within the CMA (23.8%) compares favourably to the wider Civil Service where only 15.4% of employees were from minority ethnic backgrounds in March 2023<sup>4</sup>. The diversity of new joiners within the CMA has contributed to this, where approximately one third were from ethnic minority backgrounds.
23. Representation in the SCS increased from 4.8% in 2021/22 to 5.7% in 2022/23. We expect this to further increase in future years through the programmes of work detailed in our action plan. In the wider Civil Service, the representation of staff from ethnic minority backgrounds at SCS grades is 10.5% as at 31 March 2023<sup>5</sup>.
24. Improving the ethnicity balance in senior grades will be one of the key ways in which we will reduce the pay gaps at the CMA.

## Calculating the Ethnicity Pay Gap

### Ordinary Pay

25. Ordinary pay, expressed as hourly pay, is used to calculate the mean and median ethnicity pay gaps. Ordinary pay includes basic pay, any allowances and any bonus payments made in March 2023. Salary sacrifice amounts are deducted from this value.
26. The calculation for the mean and median ordinary pay only includes 'full pay relevant' employees; that is, those employees who were on full pay in March 2023 as described in paragraph 19.
27. The ethnicity pay gap calculations are based on the number of individual employees, and not on full-time equivalents. This means that each part-time employee counts as one employee.
28. The following table shows the **mean pay gap** (the difference in the average hourly pay for each ethnic group compared to the white ethnic group) and the **median pay gap** (the difference in the median hourly pay for each ethnic group compared to the white ethnic group). The 2021/22 pay gaps have been provided for comparison.

---

<sup>4</sup> [Statistical bulletin - Civil Service Statistics 2023](#), published August 2023

<sup>5</sup> [Statistical bulletin - Civil Service Statistics 2023](#), published August 2023

**Figure 2: Mean and median ethnicity pay gaps for 2022/23**

Ethnic Group	2022/23 Mean Pay Gap*	2022/23 Median Pay Gap*	2021/22 Mean Pay Gap	2021/22 Median Pay Gap
Black	33.4%	32.7%	36.7%	35.3%
Asian	25.9%	32.5%	24.1%	27.8%
Mixed	27.1%	28.2%	26.5%	23.6%
Other	-14.7%	-26.7%	10.7%	4.4%
All Minority Ethnic Groups	25.8%	31.1%	26.4%	27.3%

*\*Where we have a negative percentage, this means that the average pay of staff within the relevant cohort is higher than the pay of white staff at the same grade.*

29. The most significant factor in our ordinary pay gaps is the distribution of our ethnic minority staff – specifically, the overrepresentation at junior grades and underrepresentation at senior grades (as shown in Figure 1). This applies to black, Asian and mixed ethnic groups, where 61.0%, 57.3% and 61.0% of these groups, respectively, are in grades AO to SEO, in contrast to 23.8% of the white population.
30. The mean ordinary pay gap figure overall for all ethnic minority groups has reduced by 0.6 percentage points and the median ordinary pay gap figure has increased by 3.8 percentage points since 2021/22.
31. Additionally, the mean and median figures have fallen for the black ethnic minority group. The reduction in the ordinary pay gap can be attributed to a smaller proportion of black joiners being recruited to roles at grades AO to SEO. Conversely, we have seen an increase in ordinary pay gap for the Asian and mixed ethnic groups. A higher proportion of Asian joiners were recruited to roles at grades AO to SEO.
32. Following the 2021/22 pay gap report, we have seen a slight increase in representation of ethnic minority staff at senior grades, with an increase of 0.9 percentage points for SCS grades.
33. Although we have seen an increase in representation of ethnic minority staff at senior grades, thus reducing the mean pay gap, the majority of staff are concentrated at the junior level, which has caused the median pay gap to rise. Of all ethnic minority relevant joiners for 2022/23, 71.2% were at grades AO – SEO, compared with 48.8% of all relevant white joiners.
34. Beyond the ongoing factor of lack of representation at senior grades which contributes to the pay gap, additional factors include:
  - a) **Competition specialist ranges** – The CMA has differentiated ‘competition specialist’ pay ranges for Grade 7, Grade 6, SCS PB1 and

SCS PB2. While we have consolidated reporting at each grade, it should be noted that the competition specialist pay ranges have higher starting salaries and higher mid points compared to non-competition specialist roles where there is a higher proportion of ethnic minority staff. We also have higher maximum salaries for competition specialist roles for Grade 7 and Grade 6. 13% of competition specialist roles are occupied by ethnic minority staff, 77% by white staff and 10% by staff who have not stated or prefer not to declare their ethnicity.

b) **Digital Data and Technology (DDaT) allowances** – These capability-based allowances are targeted to specific DDaT roles, which attract a premium in the market due to their relative scarcity, with the aim of attracting and retaining permanent staff in these roles. Staff in eligible roles, as defined by the Government Digital Service, are required to evidence their skill level corresponding to essential DDaT skills. The number of recipients from ethnic minority backgrounds in receipt of DDaT allowances has reduced from 30.4% to 20%. However, the average allowances paid to ethnic minority staff was 20% higher than for white staff (in 2021-22, the average DDaT allowance was 11.6% higher for white staff). There are a small number of SEO roles that qualify for DDaT, which is the entry level for the DDaT allowances. Currently no staff from ethnic minority backgrounds occupy those eligible roles at the SEO grade.

35. The following table shows the mean and median ethnicity pay gaps for 2022/23 broken down by grade. These have been reported as a combination of all ethnic minorities rather than providing a breakdown for each ethnic group due to the small population sizes within each grade.

**Figure 3: Mean and median ethnicity pay gaps by grade for 2022/23**

Grade	Mean Pay Gap	Median Pay Gap
AO	2.0%	3.7%
EO	6.2%	5.6%
HEO	0.9%	0.1%
SEO	3.2%	2.7%
G7	1.4%	1.2%
G6	0.2%	-2.2%
SCS*	0.2%	2.6%

*\*The profile of staff at SCS grades has been combined to avoid disclosure of individual ethnic backgrounds, due to small population sizes.*

36. Figure 3 shows that some grades have a gap of less than 2%, with the largest pay gap being 6.2%. Where there is a negative percentage, this means that

the ordinary pay for an ethnic minority group is higher than the white comparator group.

37. Our Pay Policy sets out rules for salaries on appointment which limits starting salaries to the grade minimum up to the grade midpoint; this has the effect of limiting differences in pay between existing staff and new starters which also has the potential to negatively impact our pay gaps. The decision to award a flat 3% increase to grades AO to Grade 6 for 2022/23 has also meant that we have seen only small changes in the comparative mean and median pay gaps since 2021/22. We also chose to pay higher awards to SCS colleagues lowest in their pay band which had a small positive impact on the SCS grade mean pay gap.
38. The mean and median pay gaps by grade should be contrasted with the overall CMA mean and median pay gaps of 25.8% and 31.1% respectively. The overall CMA mean and median pay gaps are primarily driven by the under-representation of ethnic minority staff in senior grades, particularly in the SCS, relative to their population in the organisation.

## **Bonus Pay**

39. Bonus pay, which is also calculated as mean and median, is based on bonus payments paid to staff throughout the 2022/23 financial year.
40. This calculation may include employees who are not 'full pay relevant' employees but will not include employees who left the CMA before 31 March 2023.
41. At the CMA, usually bonus pay includes any performance related pay (PRP). These are payments based on performance management outcomes for the previous financial year. In the case of staff in grades AO to Grade 6, these payments are negotiated annually with our recognised trade unions. For SCS staff, there are separate arrangements which are centrally set by government each year. However, on an exceptional basis for the 2022/23 pay award for staff at grades AO to Grade 6, it was agreed that there would not be a link between performance ratings and non-consolidated payments. An organisational award was paid instead, in recognition of the continuing high performance across the CMA during a challenging year (2021/22). This award was included in the bonus payments made during the 2022/23 financial year and is therefore included in the bonus gap calculations.
42. Staff in grades AO to Grade 6 also had a Staff Recognition Scheme which provided non-consolidated payments. During the 2022/23 financial year, these

awards were valued between £50 and £500. Any scheme awards made during the 2022/23 financial year are also included in bonus pay calculations.

43. Bonus calculations also include 'Pivotal Role Allowances'. These payments, approved by a subgroup of the Civil Service Board and Chief Secretary to Treasury, are aimed at retaining SCS staff in highly specialised roles and those delivering high-risk, major projects within the Civil Service. The allowances were paid to a small number of SCS staff in the 2022/23 financial year on completion of project milestones.
44. Taking into account all types of bonus payments, the proportion of staff in receipt of bonuses by ethnic group is set out below. The 2021/22 proportions have also been provided for comparison.

**Figure 4: Proportion of staff in receipt of bonuses for 2022/23**

Ethnic Group	2022/23	2021/22
White	76.8%	79.0%
Black	74.4%	86.0%
Asian	74.4%	80.2%
Mixed	94.7%	83.8%
Other	63.6%	91.7%
All Minority Ethnic Groups	77.1%	82.8%
All Staff	77.2%	80.2%

45. We note that there is an overall decrease in the proportion of staff who received a bonus in 2022/23. This is reflected in decreases to the proportion of staff from all ethnic groups, except mixed, receiving bonuses. We attribute this overall reduction to the fact that even though organisational awards were awarded to the majority of staff in grades AO to Grade 6 in 2022/23, the number of staff who were not eligible for an organisational award increased. This has a particular impact on ethnic minority groups as the majority of ethnic minority staff are in grades AO to Grade 6. Staff at grades AO to Grade 6 who did not have sufficient service to receive a performance rating for the year 2021/22 were not eligible to receive an organisational award during 2022/23. However, they were still eligible to take part in the staff recognition scheme during 2022/23 and were therefore included in the overall bonus gap calculations.
46. The following table shows the **mean bonus gap** (which is the difference in the average bonus pay for each ethnic group compared to the white ethnic group) and the **median bonus gap** (which is the difference in the median bonus pay for each ethnic group compared to the white ethnic group). The 2019/20, 2020/21 and 2021/22 bonus gaps have been provided as a comparator:

**Figure 5: Mean and median bonus pay gaps for 2022/23**

Ethnic Group	2022/23 Mean Bonus Gap	2022/23 Median Bonus Gap	2021/22 Mean Bonus Gap	2021/22 Median Bonus Gap*
Black	47.3%	5.0%	54.2%	15.0%
Asian	43.1%	10.0%	45.5%	10.3%
Mixed	48.8%	5.0%	44.0%	-3.7%
Other	42.9%	5.0%	48.9%	10.3%
All Minority Ethnic Groups	45.0%	5.0%	47.4%	10.3%

*\*Where we have a negative percentage, this means that the average pay of staff within the relevant cohort is higher than the pay of white staff at the same grade.*

47. We observe that both mean and median bonus pay gaps overall have reduced, with the mean gap reducing to 45.0% from 47.4% and the median from 10.3% to 5.0% this year. The median in particular has reduced for all ethnic minority groups, except for mixed staff. The main contributing factor to this is the payment of the organisational award paid to all AO to Grade 6 staff in receipt of a performance rating, irrespective of the actual rating itself.
48. Despite this overall reduction, we know that the bonus gap continues to be affected by the following factors:
- a) The value of bonuses for SCS staff is significantly higher than staff in grades AO to Grade 6. This is due to the size of the ‘non-consolidated performance pay pots’ which are set centrally by government; eligible SCS staff share 3.3% of the previous year’s SCS paybill for bonuses compared with 1.5% for staff at grades AO to Grade 6. The difference in the size of the pots, and that this group is not ethnically diverse widens the bonus gap significantly.
  - b) The inclusion of Pivotal Role Allowances in bonus calculations, as all current recipients fall under the white ethnic group.
49. The following table shows the mean and median ethnicity bonus gaps for 2022/23 broken down by grade. These have been reported as a combination of all ethnic minorities rather than providing a breakdown for each ethnic group due to the small population sizes within each grade.

**Figure 6: Mean and median ethnicity bonus gaps by grade for 2022/23**

Grade	Mean Bonus Gap	Median Bonus Gap
-------	----------------	------------------



AO	0.0%	57.1%
EO	9.3%	12.2%
HEO	-19.9%	-16.7%
SEO	-6.6%	0.0%
G7	0.6%	7.1%
G6	-0.9%	-2.4%
SCS*	68.5%	92.2%

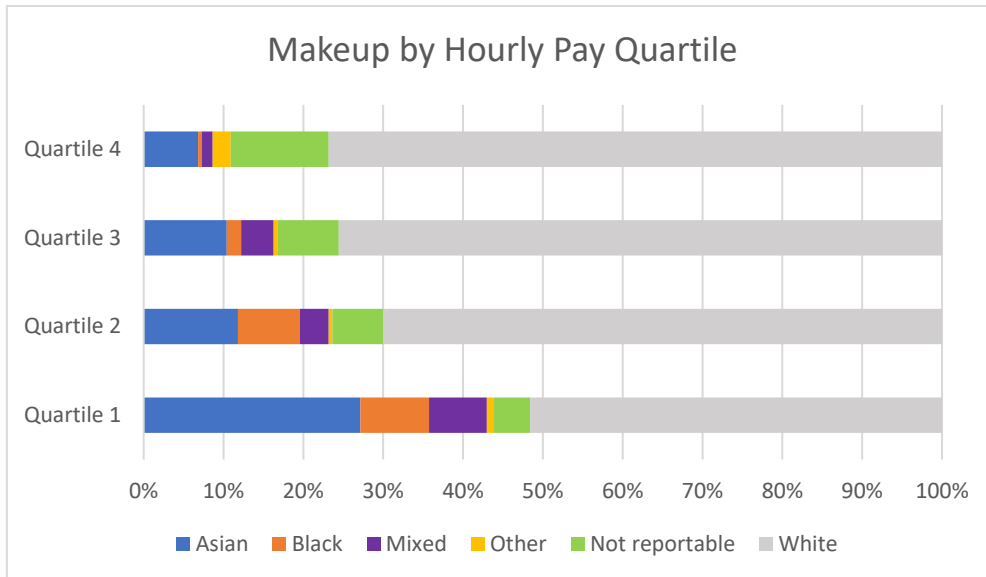
*\*The profile of staff at SCS grades has been combined to avoid disclosure of individual ethnic backgrounds, due to small population sizes.*

50. While the overall bonus gaps are primarily driven by the underrepresentation at senior grades, particularly the SCS, and their implications on bonus values, the differences at a grade level are also caused by the following factors:
- a) For all AO – Grade 6 ethnic minority staff in receipt of a Staff Recognition Scheme payment in 2022/23, the average level award for white staff is 2.8% higher than that for ethnic minority staff.
  - b) Eligibility for organisational award - the bonus gaps are impacted by the fact a proportion of the workforce received the organisational award, while others who were not eligible did not. Staff at grades AO to Grade 6 who did not have sufficient service to receive a performance rating for the year 2021/22 were not eligible to receive an organisational award during 2022/23. 27.4% of staff from ethnic minority groups were not eligible compared with 22.9% of white staff.

## **Pay Quartiles**

51. The hourly pay quartiles are calculated by listing all employees in order of hourly pay and splitting them into four equal parts. The chart below shows the proportion of staff by ethnicity that are in each pay quartile.

**Figure 7: Proportion of staff by ethnic group in each pay quartile for 2022/23**



52. The concentration of staff from minority ethnic backgrounds in the lower quartile reflects the overall ethnic profile of the CMA and the fact that these staff are in more junior roles. The upper quartile, which is mainly comprised of Grade 6 competition specialists and SCS staff, has the lowest proportion of ethnic minority staff. Increasing ethnic minority representation at senior grades, particularly the SCS, will improve the ethnicity balance in the upper quartile and reduce our pay gaps.

## Closing the Gap – Actions for the CMA

53. The CMA is committed to promoting equality and diversity amongst our workforce. We take steps to ensure we are a great employer that values and welcomes the different ideas, skills, behaviours and experiences of our colleagues. We also aim to foster a culture that promotes wellbeing and mental health and provides support so all our colleagues can thrive.
54. We continue to take steps to minimise the ethnicity pay gap and our approach to pay seeks to reward staff fairly, regardless of ethnic background. We are committed to reducing, and eventually eliminating, the ethnicity pay gap.
55. Our [Equality, Diversity and Inclusion Strategy 2020 - 2024](#) describes how equality, diversity and inclusion are essential to the way that we operate, both as the UK’s competition authority and as an employer. We have published reviews of our progress against our strategy, objectives and action plans in April 2021 and September 2022
56. To deliver the final two years of our [Equality, Diversity and Inclusion Strategy 2020 - 2024](#), we launched a detailed action plan, following engagement with

internal stakeholders. The initiatives in the plan are intended to make a wide-reaching impact on equality, diversity and inclusion at the CMA, including having an impact on our pay gaps. Each action was assessed to determine whether it would help to:

- (i) reduce the gender and / or ethnicity pay gaps
- (ii) improve diverse representation
- (iii) improve our culture of inclusivity
- (iv) remove, reduce and / or mitigate the potential for bias

57. Our [Equality, Diversity and Inclusion Action Plan](#) is focussed on:

- Recruitment and ‘growing our own’
- Career progression and development
- Improving senior representation
- Pay and reward
- Promoting a culture of inclusivity

Within each area we are prioritising some top actions, our ‘Accelerators’, where we will particularly focus our energy to make the most difference,

58. The plan was launched one day before the snapshot date (31 March 2023) for this pay gap report, so we did not expect the action plan to have affected the gender and ethnicity pay gap outcomes for 2022 – 2023 and we recognise that some of the actions and initiatives may take some time to be fully realised.

59. We will ensure that all pay activities and initiatives continue to consider the equality impact and support this drive to address and minimise our gaps.

60. The CMA Board, Executive and Chief Executive are committed to our ambitious yet achievable plans that will deliver change, not just in our gender and ethnicity pay gaps, but more broadly so the CMA is a truly inclusive and representative place to work.

## Declaration

61. The CMA confirms that all calculations have been carried out with all efforts made to ensure a robust and methodical approach to the production of our findings.