



Kia Toipoto — Gender and ethnic pay gaps action plan 2021 - 2024

As of 31 March 2023

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Purpose

The purpose of this report is to provide an update on the Commerce Commission's (Commission) progress and action plans during the period 2021 – 2024 in support of [Kia Toipoto's](#) three-year goals to:

- make substantial progress toward closing gender, Māori, Pacific, and ethnic pay gaps
- accelerate progress for wāhine Māori, Pacific women, and women from ethnic communities
- create fairer workplaces for all, including disabled people and members of rainbow communities.

Te whakamārama i te pūtake o Kia Toipoto | Understanding the purpose of Kia Toipoto ¹

Launched in November 2021, Kia Toipoto builds on the successful Public Service Gender Pay Gap Action Plan 2018–20 but goes wider than gender and extends to Crown entities. Kia Toipoto comes from the saying "Waiho i te toipoto, kaua i te toiroa | let us be united, not wide apart." The name speaks to closing gaps and creating unity and fairness for all peoples.

By putting Kia Toipoto into action, agencies and Crown entities can achieve the expectations set out in the Public Service Act 2020 and the Government Workforce Policy Statement 2021. These require the Public Service to be a good employer and close gender and ethnic pay gaps.

Kia Toipoto has six focus areas:

- Te Pono | Transparency
- Ngā Hua Tōkeke mō te Utu | Equitable pay outcomes
- Te whai kanohi i ngā taumata katoa | Leadership and representation
- Te Whakawhanaketanga i te Aramahi | Effective career and leadership development
- Te whakakore i te katoa o ngā momo whakatoihara, haukume anō hoki | Eliminating all forms of bias and discrimination.
- Te Taunoa o te Mahi Pīngore | Flexible-work-by-default

¹ Kia Toipoto

<https://www.publicservice.govt.nz/system/public-service-people/pay-gaps-and-pay-equity/kia-toipoto/>

Towards achieving progress under these Kia Toipoto focus areas, agencies and Crown entities will:

- publish their pay gaps in pay gaps action plans each year
- ensure bias does not influence starting salaries or pay for employees in the same or similar roles.
- have plans to improve gender and ethnic representation in their workforce and leadership.
- develop equitable career pathways and opportunities to progress.
- protect against bias and discrimination in HR and remuneration policies and practices
- build cultural competence
- normalise flexible working.

Agencies and Crown entities will engage with employees and unions in their work to close their gender and ethnic pay gaps.

Reporting on gender and ethnic pay differences

In December 2022 we published a snapshot of the Commerce Commission's employee stats as of 30 June 2022 on gender and ethnic pay differences. To view the report click [Here](#).

Milestones and commitments

Progress to date and plans for the coming year against Kia Toipoto milestones.

| Engagement with our people | |
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| Agencies and entities will engage with unions and employees from the earliest planning stages | |
| Progress | <p>Our regular internal employee engagement survey (ComPulse) includes topics relevant to Kia Toipoto milestones, including questions on fairness of remuneration, career opportunities and flexible working.</p> <p>Reviewing individual team and aggregated team scores, together with free text comments from employees provide insights and opportunities for action planning.</p> <p>Our employee engagement platform offers two-way communication between people leaders and employees which enables quick action on feedback and provides another communication channel between leadership and team members.</p> |
| Deliverables 2023/2024 | <p>Ongoing analysis of employee feedback through our engagement survey process.</p> <p>Review and update of diversity, inclusion, reward, and equity questions in our employee engagement survey.</p> <p>Continue to seek deeper insights and feedback, for example consider introducing an annual stand-alone diversity, inclusion, and equity survey.</p> <p>Consider how best to engage with our recently formed employee networks and other employee groups on Kia Toipoto as our representation levels grow.</p> <p>Further engagement with our internal Te Ohu Māori (te ao Māori team) to ensure insights are captured and alignment with planned actions.</p> |

Te Pono | Transparency

Agencies and entities publish annual action plans based on gender and ethnicity data and union/employee feedback

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| Progress | Gender and ethnic pay differences report published on our website in December 2022. |
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| Deliverables 2023/2024 | <p>Kia Toipoto action plan published by 28 April 2023.</p> <p>Updated action plan published by deadline as per Te Kawa Mataaho Public Service Commission requirements.</p> |
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Agencies and entities ensure easy access to HR and remuneration policies including salary bands

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| Progress | <p>People policies and guidelines are available on our intranet.</p> <p>Employees can request individual salary band information.</p> |
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| Deliverables 2023/2024 | <p>Internal grades and salary bands are published by end of 2023.</p> <p>Job advertisements to include salary ranges by end of 2023.</p> <p>Refreshed people policies, including remuneration policies, encompassing employee feedback are updated and published by end of 2023.</p> |
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Ngā Hua Tōkeke mō te Utu | Equitable pay outcomes

By the end of 2022 entities ensure that starting salaries and salaries for the same or similar roles are not influenced by bias

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| Progress | <p>Targeted learning resources are provided in unconscious bias as well as inclusive workplace practices focused on recruitment, development, remuneration and performance.</p> <p>2022 Remuneration review process included applying a gender and ethnic lens in reviewing and moderating increments.</p> |
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| Deliverables 2023/2024 | <p>Consider developing a tool for hiring managers/talent team/HR to use when deciding starting salaries for new hires.</p> <p>Investigate additional guidance for hiring managers in setting starting salaries.</p> <p>Explore deeper salary analysis of like for like roles, by gender and ethnicity to better understand where and why pay gaps exist.</p> |
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Agencies monitor starting salaries and salaries for the same or similar roles to ensure gender and ethnic pay gaps do not reopen.

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| Progress | Starting salary gender pay gap analysis completed in November 2022. |
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| Deliverables 2023/2024 | Regular analysis of starting salaries to determine if any pay gaps are evident. |
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Pay equity processes are used to address claims and reduce the impact of occupational segregation.

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| Progress | The Commission is subject to the amended Equal Pay Act and employees can raise a claim using the framework. |
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| Deliverables 2023/2024 | Provide a summary report including recommendations. |
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Te whai kanohi i ngā taumata katoa | Leadership and representation

By the end of April 2023 agencies/entities have plans and targets to improve gender and ethnic representation in their work force and leadership

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| Progress | <p>Creating pathways for young Māori and Pacific students via our internships (Tupu Toa and Tupu Tai).</p> <p>New careers site with people profiles to share the stories of our people and what they value about working here.</p> <p>Recruitment practices reviewed as part of new applicant tracking system implementation in 2022.</p> <p>Te reo Māori in all job advertisements and careers site. Consistent use of Māori and Pacific job boards.</p> <p>Increased recruitment advice and resources for hiring managers to reduce unconscious bias in recruitment process.</p> |
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| Deliverables 2023/2024 | <p>Work alongside our internal Te Ohu Māori (te ao Māori team) to grow connections with Iwi, Hapū, and Māori businesses to create pathways to the Commission for rangatahi and senior level talent.</p> <p>Build relationships with Māori Liaison teams at universities and investigate scholarships for Māori and Pacific students.</p> <p>Increase proactive sourcing to create diverse talent pools.</p> <p>Commitment to gender balanced shortlists for all vacancies.</p> <p>Regular profiling of our women in leadership, internally and on our careers site and social media sites.</p> <p>Continued review of recruitment practices to support incorporating te ao Māori perspective and accessibility for all applicants.</p> |
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By the end of 2024 the Public Service workforce and leadership are substantially more representative of society.

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| Progress | Analysis and reporting on current representation. |
| Deliverables 2023/2024 | Regular monitoring/reporting is established. Consider setting representation targets. |

Te Whakawhanaketanga i te Aramahi | Effective career and leadership development

By mid-2023 agencies/entities have career pathways and equitable progression opportunities that support women, Māori, Pacific and ethnic employees to achieve their career aspirations.

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| Progress | New Growth & Development framework available to provide a structured approach to the growth of our people through identifying relevant capabilities to support career development. This includes learning resources on te ao Māori, cultural competence, and inclusive leadership. |
| Deliverables 2023/2024 | Ensure connections established across the public sector to enable participation in targeted opportunities that support women, Māori, Pacific, and ethnic employees. |

Te Taunoa o te Mahi Pīngore | Flexible-work-by-default

By the end of 2024 agencies and entities offer equitable access to flexible-by-default working and ensure it does not undermine career progression or pay

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| Progress | Our flexible working policy and procedure enables access to flexible-by-default working options for all our people. |
| Deliverables 2023/2024 | <p>Refresh of our flexible working policy by end of 2023. To include and address any existing pockets within the Commission where its application may be improved to ensure consistency.</p> <p>Continue to monitor flexible working requests and promote flexible working.</p> |

Te whakakore i te katoa o ngā momo whakatoihara, haukume anō hoki | Eliminating all forms of bias and discrimination

By the end of 2023 entities have remuneration and HR systems, policies and practices designed to remove all forms of bias and discrimination.

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| Progress | Well established policies in place, including new recruitment and selection policy due to be launched. |
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| Deliverables 2023/2024 | Policies to be reviewed include overall approach to remuneration and total reward, and refresh of our approach to flexible working. |
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Agencies embed and monitor the impact of bias-free HR and remuneration policies and practices

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| Progress | Current analysis and reporting include diversity and inclusion progress reviews for annual reporting, and bi-annual collection and analysis of turnover information and exit interview feedback. |
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| Deliverables 2023/2024 | Review and agree actions to enhance assessment of any bias in HR and remuneration policies. For example, detailed analysis to understand pay gaps in like for like roles. |
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Agencies/entities ensure leaders and employees learn about and demonstrate cultural competence.

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| Progress | <p>Mana Aki modules rolled out to support building of cultural competence. This programme requires our leaders to reflect on cultural diversity and engage with their teams in learning. Inclusive Leadership learning modules to enhance understanding and awareness of inclusive practices.</p> |
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Participation in Wall Walk and Te Tiriti workshops.

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| Deliverables 2023/2024 | <p>Internal Te Ohu Māori (te ao Māori team) supported by People and Capability team to lead the delivery of our Rautaki Māori (Māori Strategy) and Mahere reo mō (Māori Language Plan).</p> <p>Development of Commission application (app) to support Māoritanga.</p> <p>Te reo Māori classes established for our employees.</p> |
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