



# Kia Toipoto

## Gender and ethnic pay gap action plan 2021-24

April 2024 progress update

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This report provides an update on the Commission's progress towards closing gender and ethnic pay gaps and enhancing equality and opportunity in our workforce.

## About us

The Commerce Commission | Te Komihana Tauhokohoko is New Zealand's primary competition, fair trading, consumer credit and economic regulatory agency.

Our vision is making New Zealanders better off because markets work well, and consumers and businesses are confident market participants.

One of our strategic people goals is 'building and maintaining an inclusive, diverse, and healthy environment where our people are safe, feel valued, supported, respected and can flourish'.

## Understanding our pay gaps and representation

Our gender pay gap is the lowest it's been since June 2021.

Our data analysis tells us the main contributing factor to the existing gender pay gap continues to be occupational segregation. We have a higher proportion of females in lower banded roles.

Analysis of like-for-like roles shows that while occupational segregation is a factor in our ethnic pay gap, there are some salary bands where a horizontal ethnic pay gap exists. Further investigation, analysis, and monitoring of this is planned.

Our data analysis shows that representation of Pacific peoples within the Commission has increased and is slightly below the New Zealand working age population. Representation at leadership levels is low for Pacific peoples and further investigation is planned.

Māori representation at leadership level has increased although overall representation is still low compared to the New Zealand working age population.


Increasing representation of Māori, Pacific peoples, and other ethnicities in our workforce, including in leadership roles, continues to be a key focus of our Kia Toipoto action planning.

- Previously published gender and ethnic pay gap reporting and action planning can be viewed on our [website](#).

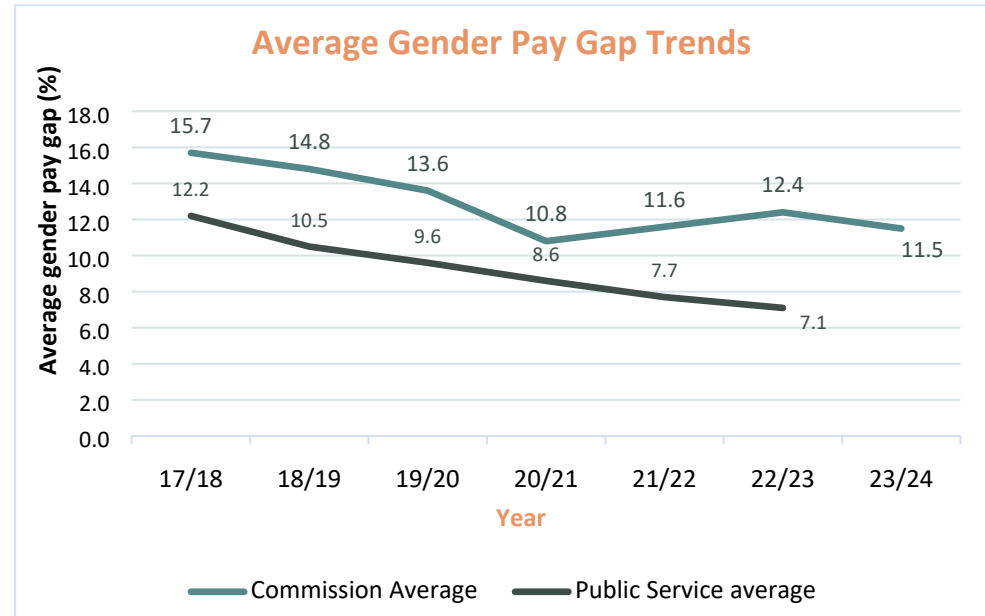
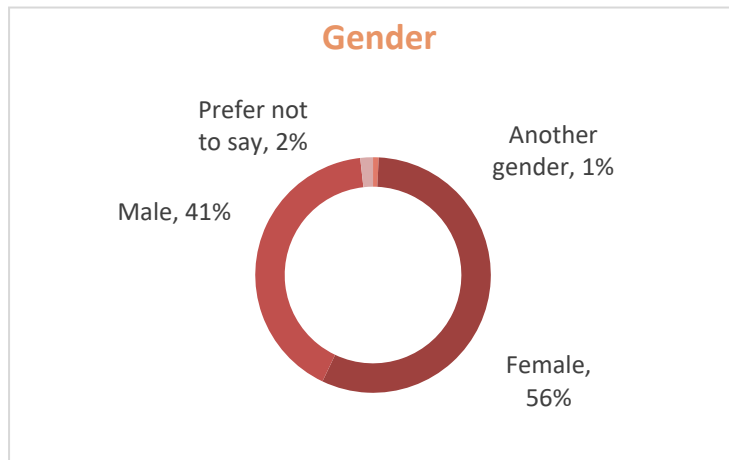
## Our data (March 2024)

 **519**  
Employees

 **41**  
Average age

 **11.5%**  
Gender pay gap  
(average)

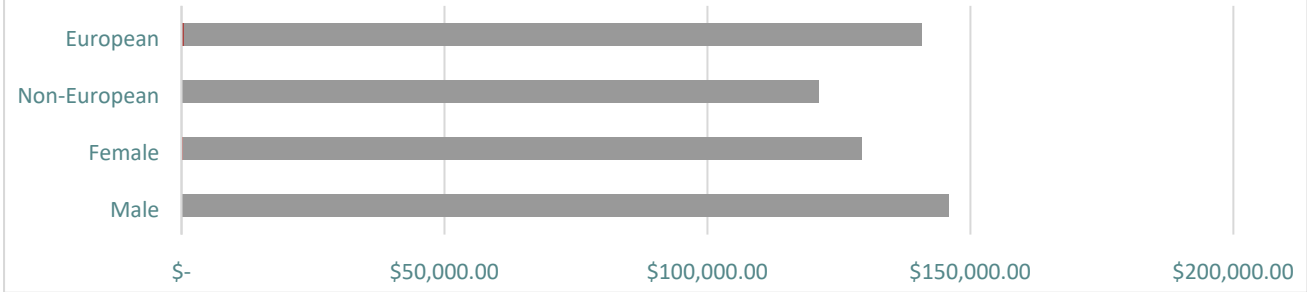
 **13.7%**  
Ethnic pay gap  
(average)



Note: public service data for 2023/24 year not yet available

- 'Employees' refers to all permanent and fixed-term employees of the Commission as of 13 March 2024.
- 'Pay' refers to employee's base salary as of 13 March 2024.
- The Chief Executive(s) are included in representation data but excluded from pay gap calculations, as recommended by Te Kawa Mataaho

### Average salary comparisons



### Gender and ethnic representation

	Workforce representation	All people leaders	Leaders Tiers 1-3	NZ Working Age Population
<b>Gender</b>				
Male	41%	52%	49%	50%
Female	56%	48%	51%	50%
Another gender	1%	0%	0%	0%
<b>Ethnicity</b>				
Asian	12%	6%	10%	17%
Pacific Peoples	4%	1%	0%	7%
European	81%	93%	90%	67%
Māori	4%	6%	10%	15%
Middle Eastern/Latin American/African	4%	3%	2%	2%
Other Ethnicity	5%	3%	4%	2%

\*Source – NZ Working Age Population: Stats NZ Household Labour Survey December 2023

\*\* we have ethnicity data for 98% of employees

# Action plan

Focus area and milestone	2022 Progress	2023-2024 Actions	Progress Update
<p><b>Engagement with our people</b></p> <p>Agencies and entities will engage with unions and employees from the earliest planning stages.</p>	<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>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><b>Completed.</b> Ongoing analysis of employee feedback through our quarterly engagement survey process continues.</p> <p>Questions reviewed for suitability and plans in place to run a stand-alone DEI and Wellbeing survey in August 2024.</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>	<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><b>Ongoing.</b> Regular engagement with employee networks (ELN's) established. ELN's have shown steady growth in 2023/2024. New Neurodiversity, COMunity Pride, and Women's networks set up.</p> <p>Series of workshops underway with ELN's to seek insights that will inform Kia Toipoto planning and explore opportunities and barriers for different groups.</p> <p>Recently established union representation at the Commission presents an opportunity for future engagement with this group.</p>
		<p>Further engagement with our internal Te Ohu Māori (te ao Māori team) to ensure insights are captured and aligned with planned actions.</p>	<p><b>ONGOING.</b> People and Capability are working collaboratively with Te Ohu Māori on delivery of planned actions.</p>

Focus area and milestone	2022 Progress	2023-2024 Actions	Progress Update
<p><b>Te Pono   Transparency</b></p> <p>Agencies and entities publish annual action plans based on gender and ethnicity data and union/employee feedback.</p>	<p>Gender and ethnic pay differences report published on our website in December 2022.</p>	<p>Kia Toipoto action plan published by 28 April 2023.</p> <p>Action plan update published by 28 April 2024.</p>	<p><b>Completed.</b></p> <p><b>Completed.</b></p>
<p>Agencies and entities ensure easy access to HR and remuneration policies including salary bands.</p>	<p>People policies and guidelines are available on our intranet.</p> <p>Employees can request individual salary band information.</p>	<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><b>Completed.</b></p> <p><b>Completed.</b></p>
		<p>Refreshed people policies, including remuneration policies, encompassing employee feedback are updated and published by end of 2023.</p>	<p><b>Completed.</b> Remuneration and reward approach (including salary band visibility) reviewed and published internally in March 2024.</p>
<p><b>Ngā Hua Tōkeke mō te Utu   Equitable pay outcomes</b></p> <p>By the end of 2022 entities ensure that starting salaries and salaries for the same or similar roles are not influenced by bias.</p>	<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>	<p>Consider developing a tool for hiring managers/talent team/HR to use when deciding starting salaries for new hires.</p>	<p><b>On-going.</b> New Systems and Reporting team appointed and initial improvements to our reporting ensure that starting salary guidance is available as required.</p> <p>Development of salary comparison tool is planned for 2025.</p>

Focus area and milestone	2022 Progress	2023-2024 Actions	Progress Update
<p><b>Equitable pay outcomes continued.</b></p>		<p>Investigate additional guidance for hiring managers in setting starting salaries.</p>	<p><b>Completed.</b> Review of process for setting starting salaries conducted in late 2023. No additional guidance required.</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>	<p><b>Completed.</b> Salary analysis of like for like roles undertaken for gender and ethnicity. Occupational segregation continues to be a challenge. Further investigation, analysis, and monitoring is planned for 2024 in relation to ethnic pay gaps.</p>
<p>Agencies monitor starting salaries and salaries for the same or similar roles to ensure gender and ethnic pay gaps do not reopen.</p>	<p>Starting salary gender pay gap analysis completed in November 2022.</p>	<p>Regular analysis of starting salaries to determine if any pay gaps are evident.</p>	<p><b>Completed.</b> Analysis is completed as requested/required and annually as part of our remuneration review process. Analysis includes a number of factors including employee job family, branch, salary band.</p>
<p>Pay equity processes are used to address claims and reduce the impact of occupational segregation.</p>	<p>The Commission is subject to the amended Equal Pay Act and employees can raise a claim using the framework.</p>	<p>Provide a summary report including recommendations.</p>	<p>No pay equity claims were received.</p>

Focus area and milestone	2022 Progress	2023-2024 Actions	Progress Update
<p><b>Te whai kanohi i ngā taumata katoa   Leadership and representation</b></p> <p>By the end of April 2023 agencies/entities have plans and targets to improve gender and ethnic representation in their workforce and leadership.</p>	<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 processes.</p>	<p>Work alongside Te Ohu Māori to grow connections with Iwi, Hapū, and Māori businesses to create pathways to the Commission for rangatahi and senior level talent.</p>	<p><b>Ongoing.</b> Comprehensive plan co-created by Te Ohu Māori and People and Capability teams to grow Māori and Pasifika representation at the Commission. Approach endorsed by Senior Leadership Team in February 2024. Agreed initiatives underway include:</p> <ul style="list-style-type: none"> <li>Investigate framework for annual scholarships for Mātauranga Māori, Economics, and Law.</li> <li>Developing a programme to support retaining and developing existing Māori and Pasifika employees (including Tupu Toa and Tupu Tai interns).</li> <li>Quarterly reporting to SLT and regular updates at people leaders' forums.</li> </ul>
		<p>Continued review of recruitment practices to support incorporating Te ao Māori perspective and accessibility for all applicants.</p>	<p><b>Ongoing.</b> Series of workshops with Māori, Pasifika, and Neurodiversity employee groups commenced early 2024 to gather feedback on our recruitment processes. Workshops to continue until mid-2024.</p>
		<p>Build relationships with Māori Liaison teams at universities and investigate scholarships for Māori and Pacific students.</p>	<p><b>Ongoing.</b> Building relationships with Victoria University, AUT, and Auckland University, faculty groups for Māori and Pasifika students. Advice on scholarships being sought from each institution.</p>



Focus area and milestone	2022 Progress	2023-2024 Actions	Progress Update
<p><b>Leadership and representation continued.</b></p>		<p>Increase proactive sourcing to create diverse talent pools.</p>	<p><b>Completed.</b> Regular use of LinkedIn Recruiter and networks to proactively source an increasingly diverse pool of talent. Creation of intern Alumni group.</p> <p>Note that opportunities to grow our diversity in current Public Sector climate will be reduced due to decreased opportunities for recruitment.</p>
		<p>Commitment to gender balanced shortlists for all vacancies.</p>	<p><b>Ongoing.</b> Standard practice to strive for gender balanced shortlists. Not always achieved but remains a focus area for all recruitment.</p>
		<p>Regular profiling of our women in leadership, internally and on our careers site and social media sites.</p>	<p><b>Completed.</b> Regular profiling of female employees on LinkedIn, Careers site, and internally via intranet and CE Pānui. Regular posting of internally run events that raise awareness and support the success of our female employees in the workplace.</p>
<p>By the end of 2024 the Public Service workforce and leadership are substantially more representative of society.</p>	<p>Analysis and reporting on current representation.</p>	<p>Regular monitoring/reporting is established. Consider setting representation targets.</p>	<p><b>Completed.</b> Cadence of reporting has increased. Representation targets considered and will be investigated further in 2025 given the current Public Sector climate and limited opportunities for recruitment.</p>

Focus area and milestone	2022 Progress	2023-2024 Actions	Progress Update
<p><b>Te Whakawhanaketanga i te Aramahi   Effective career and leadership development</b></p> <p>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.</p>	<p>New Growth &amp; 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.</p>	<p>Ensure connections established across the public sector to enable participation in targeted opportunities that support women, Māori, Pacific, and ethnic employees.</p>	<p><b>Ongoing.</b> Planning underway for workshops with women, Māori, and Pacific employee groups initially, to understand any barriers and opportunities that exist. Extend to other employee groups next.</p> <p>Considering partnering with an ELN to launch a mentoring programme in 2025.</p> <p>Cross agency connections continue to grow with Communities of Practice and employee-led network groups.</p>
<p><b>Te Taunoa o te Mahi Pīngore   Flexible-work-by-default</b></p> <p>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.</p>	<p>Our flexible working policy and procedure enables access to flexible by-default working options for all our people.</p>	<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>	<p><b>Ongoing.</b> Updated Flexible Working Policy drafted late 2023. On track for release by mid-2024.</p> <p><b>Completed.</b> Plans in place to continue monitoring, promoting, and supporting.</p>

Focus area and milestone	2022 Progress	2023-2024 Actions	Progress Update
<p><b>Te whakakore i te katoa o ngā momo whakatoihara, haukume anō hoki   Eliminating all forms of bias and discrimination</b></p> <p>By the end of 2023 entities have remuneration and HR systems, policies and practices designed to remove all forms of bias and discrimination.</p>	<p>Well established policies in place, including new recruitment and selection policy due to be launched.</p>	<p>Policies to be reviewed include overall approach to remuneration and total reward, and refresh of our approach to flexible working.</p>	<p><b>Completed.</b> Remuneration and reward approach reviewed, updated and published internally March 2024.</p> <p>Updated Recruitment and Selection Policy published September 2023.</p> <p><b>Ongoing.</b> Flexible Working, Health Safety &amp; Wellness policies under review.</p>
<p>Agencies embed and monitor the impact of bias-free HR and remuneration policies and practices.</p>	<p>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.</p>	<p>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.</p>	<p><b>Ongoing.</b> DEI progress reviews for annual reporting, and bi-annual collection and analysis of turnover information and exit interview feedback continue.</p> <p>Analysis of pay gaps in like for like roles established and planning for deeper analysis is underway.</p>

Focus area and milestone	2022 Progress	2023-2024 Actions	Progress Update
<p><b>Eliminating all forms of bias and discrimination continued.</b></p> <p>Agencies/entities ensure leaders and employees learn about and demonstrate cultural competence.</p>	<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.</p>	<p>Internal Te Ohu Māori 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>Te reo Māori classes established for our employees.</p>	<p><b>Ongoing.</b> We offer a range of formal and informal training opportunities to support our employees build their cultural competency.</p>
	<p>Inclusive leadership learning modules to enhance understanding and awareness of inclusive practices.</p> <p>Participation in Wall Walk and Te Tiriti workshops.</p>	<p>Development of Te Pikitanga (application) to support our people to learn and understand more about te ao Māori.</p>	<p><b>Completed.</b> Te Ohu Māori launched Māori cultural resource for our people, whānau and friends of the Commission 'Te Pikitanga' (application) September 2023</p>