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# Kia Toipoto - gender and ethnic pay gap action plan 2021-2024

**APRIL 2025 UPDATE**



# Update on our progress towards closing pay gaps and enhancing equality and opportunity in our workforce.

## About us

We are New Zealand's primary competition, fair trading, consumer credit and economic regulatory agency. Our vision is that New Zealanders are better off because markets work well, and consumers and businesses are confident market participants.

We aim to foster a connected and collaborative environment that is inclusive, diverse, safe and healthy with excellent people leadership and management to attract, develop and retain our people.

He Kawa Tauhokohoko - Our Values Framework - informs what is at the heart of the Commission, and shapes how we approach our work, each other, and those we work for.

## Understanding our pay gaps and representation

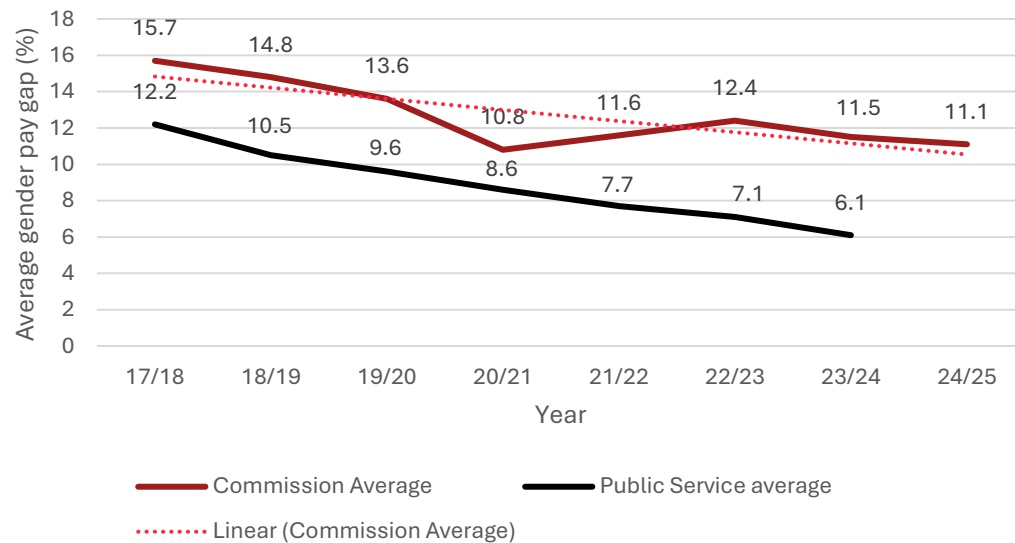


- Since our last report (March 2024) we've seen a slight decrease in both our average and median gender pay gaps. Average is down from 11.5% to 11.1% as of January 2025. Median was 14.7% last year and now sits at 14.4% Our average gender pay gap is now the lowest it has been since June 2021.
- Our Ethnic pay gap has decreased significantly. From an average of 13.7% and median of 15.1% in March 2024, we now have an average of 10.7% and a median of 14.5% as of January 2025.
- Our average salaries increased in 2024. Non-European salaries increased the most from an average of \$121,110.70 in March 2024 to \$131,566 in January 2025. This is an increase of \$10,456 across the year.
- Our male workforce has increased slightly, and with this we have seen an increase in the male population of people leaders/tier 1-3 leaders. Despite this increase, our average/median gender pay gaps have decreased which reflects the continuous work we are doing to ensure for equality across like-for-like roles.
- We have seen a 2% increase in Māori across our workforce, and a 5% increase in T1-3 leaders also. Our data analysis shows that representation of Pacific peoples within the Commission is below the New Zealand working age population. Representation at leadership levels is low for Pacific peoples and employees who identify as MELAA further investigation is planned.



# Our data

## Average Gender Pay Gap Trends

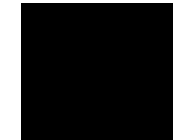


### Note:

- Gender pay gap is males compared to females, ethnicity pay gap is European vs. non-European employees
- Public service data for 2024/25 year not yet available
- 'Employees' refers to all permanent and fixed term employees of the Commission as of 31 January 2025.
- 'Pay' refers to employee's base salary as of 31 January 2025.
- The Chief Executive(s) are included in representation data but excluded from pay gap calculations, as recommended by Te Kawa Mataaho.



**456**  
employees



**41**  
Average age



**11.1%**  
Gender pay gap (average)

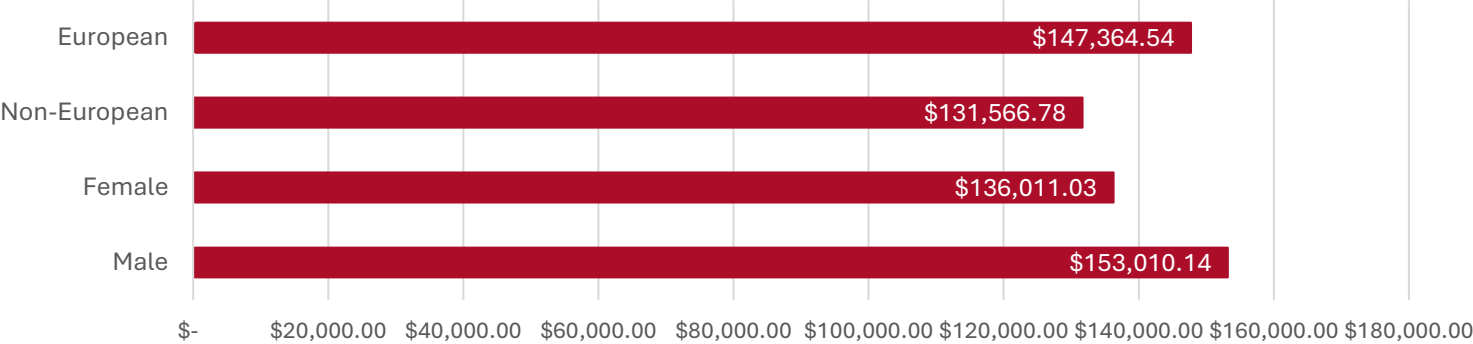


**10.7%**  
Ethnic pay gap (average)



# Our data

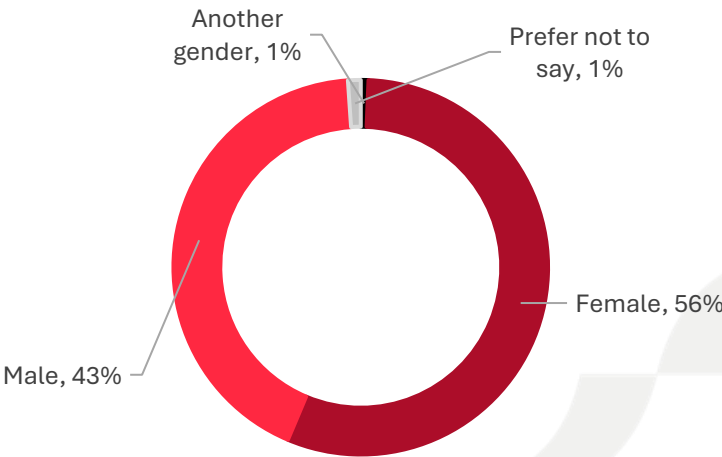
## Average Salary Comparisons



## Workforce representation

	Workforce representation	All people leaders	Leaders Tiers 1-3	NZ Working Age Population*
Gender				
Male	43%	58%	59%	50%
Female	56%	42%	41%	50%
Another gender	1%	0%	0%	0%
Ethnicity				
Asian	14%	8%	8%	19%
Pacific Peoples	4%	1%	0%	7%
European	81%	93%	90%	66%
Māori	6%	6%	15%	15%
Middle Eastern/Latin American/African	4%	2%	0%	2%
Other Ethnicity	1%	2%	5%	2%

## Gender



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

# Action plan

Focus area and milestone	Current state	Outcomes	Planned actions 2025/26
<b>Engagement with our people</b>  Agencies and entities will engage with unions and employees from the earliest planning stages.	<p>Ongoing analysis of employee feedback through our engagement survey process (includes topics relevant to Kia Toipoto milestones). For example, the ‘freedom of opinions’ engagement score is 8.9, which is within the top 5% of government globally for Peakon. Platform offers two-way communication between people leaders and employees. DEI and reward questions reviewed 2024.</p> <p>Regular engagement with our employee-led networks to inform action planning.</p> <p>Employee led network Leads Collaboration Group (comprising representatives from across our various ELN’s) established 2024 ensures intersectional approach is taken.</p> <p>Regular engagement with Te Ohu Māori to ensure opportunities for perspectives and aspirations of our Māori employees can inform our planning.</p>	<p>All our employees have regular and ongoing opportunities to provide perspectives, insights, and ideas to inform our planning.</p>	<p>Review engagement survey DEI questions in 2026.</p> <p>Standalone DEI/Wellbeing survey in collaboration with employee-led networks late 2025/early 2026.</p>
<b>Te Pono   Transparency</b>  Agencies and entities publish annual action plans based on gender and ethnicity data and union/employee feedback.	<p>Annual Kia Toipoto gender and ethnic pay gap action plans are published on our website by 30 April each year. Published plans can be viewed on our <a href="#">website</a>.</p>	<p>Our pay gaps are reported on regularly and our employee informed action planning progress is tracked.</p>	<p>No further action. Outcomes have been achieved.</p>



# Action plan

Focus area and milestone	Current state	Outcomes	Planned actions 2025/26
<b>Te Pono   Transparency continued</b>  Agencies and entities ensure easy access to HR and remuneration policies including salary bands.	People policies, guidelines, job grades and salary bands are available on our intranet. Employees can request individual salary band information.  All advertised roles include transparent salary ranges.  Remuneration and reward approach reviewed and published internally in 2024.	Our people feel able to have informed discussions about their pay with managers and understand where they sit within bands.  Job applicants have a clear understanding of salary ranges, supporting fair negotiation and reduction of opportunity for unconscious bias.	No further action. Outcomes have been achieved.
<b>Ngā Hua Tōkeke mō te Utu   Equitable pay outcomes</b>  By the end of 2022 entities ensure that starting salaries and salaries for the same or similar roles are not influenced by bias.	We offer learning on unconscious bias and inclusive workplace practices for all people leaders involved in recruitment, development, remuneration and performance.  Gender and ethnic lens consistently applied to reviewing and moderating remuneration increments.  ‘Like for like’ roles, ie within the same job grades/bands are equitable with no significant pay gaps. Occupational segregation identified as ongoing challenge in salary analysis of like for like roles. Regular monitoring established.	Reduction in gender and ethnic pay gaps in 2023 and 2024. Regular monitoring of progress will continue.  People leaders are supported with advice and accurate data to assist consideration of internal relativities when making remuneration decisions.	Monitor uptake of unconscious bias and inclusive workplace practice learning modules and promote to people leaders.  Annual remuneration review will consider gender and ethnic pay gaps across the Commission with the aim to further reduce these.



# Action plan

Focus area and milestone	Current state	Outcomes	Planned actions 2025/26
<p><b>Ngā Hua Tōkeke mō te Utu   Equitable pay outcomes continued.</b></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>Review of guidance provided to managers about salary relativities in 2024 found that a planned comparison tool is not required. Our reporting provides in-depth information to support assessment of salary relativities across teams.</p> <p>Regular analysis including employee job family, branch, salary band of starting salaries to monitor pay gaps.</p>	<p>Any pay gap movement is identified early on triggering deeper analysis and if required, remedial actions considered.</p>	<p>Deeper analysis if regular pay gap reporting identifies areas to focus on.</p>
<p>Pay equity processes are used to address claims and reduce the impact of occupational segregation.</p>	<p>Employees can raise a claim using the Equal Pay Act framework.</p> <p>No pay equity claims were received.</p>		
<p><b>Te whai kanoahi 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>We continue to support creating pathways for young Māori and Pacific students via internships (Tupu Toa and Tupu Tai and iwi).</p> <p>Te Ohu Māori growing connections with Māori stakeholders to create pathways to the Commission.</p> <p>Quarterly pay gap and workforce representation reporting to SLT established.</p>	<p>Increased representation of Women, Māori and Pasifika in our workforce and leadership.</p> <p>Strong reciprocal relationships are built with Māori stakeholders to support pathways to the Commission for Māori talent at all levels.</p>	<p>Reviewing effectiveness of internships as a pathway for early in career Māori and Pasifika talent (by mid-2025).</p> <p>We are exploring an internship (Maranga) partnership with Te Rūnanganui o Te Āti Awa – Te Ātiawa for summer 2025/26 in Wellington. A pilot programme with the intention to extend and partner with Ngāti Toa Rangatira and Ngāti Whātua in the summer of 26/27.</p>



# Action plan

Focus area and milestone	Current state	Outcomes	Planned actions 2025/26
<b>Te whai kanoahi i ngā taumata katoa   Leadership and representation continued</b>	Careers site refresh underway, includes diverse employee profiles sharing their experiences at the Commission, and a dedicated page for early career stories from past interns.		Continue partnership with Tupu Tai internship programme when it resumes in 2025.  Scholarship framework investigation to continue in 2025, focus on Mātauranga Māori, Economics, and Law.
	Review of recruitment practices with Te Ohu Māori and employee networks to support incorporating Te ao Māori perspective, inclusion and accessibility for all applicants completed in 2024. Recent changes include:  - Providing interview questions to applicants prior to interviews. - Reduced reliance on psychometric assessments which were presenting a barrier to many. - Applicants are invited to bring support person/people to interviews.	Our recruitment processes are increasingly inclusive and informed by insights provided by a diverse range of individuals and groups.	No further actions. Outcome achieved.
	Significant drop in recruitment volumes. Focus remains on creating diverse talent pools and using sourcing practices that support increased representation of women, Māori and Pasifika. We are currently:  - Storytelling via social media and other channels about the Commission's mahi. - Discussing gender diversity in teams with hiring managers when recruiting. - Striving for diverse shortlists and interview panels.	Job applicants can learn about our purpose, our values, how we work, and who works here when deciding whether to apply. Our employee value proposition for a diverse range of people is clear.	If recruitment volumes increase new actions will be considered.





# Action plan

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<p><b>Te whai kanohi i ngā taumata katoa   Leadership and representation continued</b></p> <p>By the end of 2024 the Public Service workforce and leadership are substantially more representative of society.</p>	<p>Regular analysis and reporting on current representation. Cadence of reporting has increased to quarterly.</p>		<p>Reconsider targets for representation in 2026.</p>
<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>Our Growth &amp; Development framework supports our people to identify relevant capabilities for career growth.</p> <p>Employee-led networks participate in public sector network groups to support the development of a range of employees e.g. Government Women's Network (GWN), Cross Agency Rainbow Network (CARN), Indigo (Neurodiversity Network).</p> <p>We regularly engage with our employee-led networks to better understand barriers and opportunities that exist.</p> <p>Mentoring pilot programme launched in 2025 in partnership with He Waipuna (our Women's Network) to support the development of women at the Commission.</p>	<p>Our people are supported to identify clear steps to achieve their career aspirations.</p> <p>Our people have regular opportunities to share insights about barriers or opportunities they experience which informs our capability and development planning.</p> <p>Mentoring programme participants have dedicated 1:1 support to achieve their career aspirations.</p>	<p>Review success of mentoring pilot programme with a view to offering again in 2026.</p>



# Action plan

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<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>Remuneration and reward approach reviewed, updated and published internally March 2024.</p> <p>Supporting policies recently refreshed include; Leave, Flexible Working, Recruitment and Selection, Health and Safety, and Diversity, Equity and Inclusion.</p>	<p>Our people have a clear understanding of our approach to remuneration and reward.</p>	<p>No further actions. Outcome achieved.</p>
<p>Agencies embed and monitor the impact of bias-free HR and remuneration policies and practices.</p>	<p>Our regular reporting includes annual Kia Toipoto reporting and quarterly analysis of pay gaps, turnover, and exit interview feedback.</p>	<p>Our regular reporting and analysis ensure visibility of the impact of bias free HR and remuneration policies and practices.</p>	<p>No further actions. Outcome achieved.</p>
<p>Agencies/entities ensure leaders and employees learn about and demonstrate cultural competence.</p>	<p>Modules offered and recommended for people leaders:</p> <ul style="list-style-type: none"> <li>- Mana Aki; requires our leaders to reflect on cultural diversity and engage with their teams in learning.</li> <li>- Inclusive leadership; to enhance understanding and awareness of inclusive practices.</li> </ul> <p>Workshops offered to our people include:</p> <ul style="list-style-type: none"> <li>- Wall Walk   fostering understanding of New Zealand History, Māori-Crown relations and biculturalism.</li> <li>- Te Tiriti o Waitangi capability building.</li> </ul>	<p>We offer and promote learning opportunities to grow cultural competence for all our people.</p>	



# Action plan

Focus area and milestone	Current state	Outcomes	Planned actions 2025/26
<b>Te whakakore i te katoa o ngā momo whakatoihara, haukume anō hoki   Eliminating all forms of bias and discrimination continued</b>	<p>Delivery of our Rautaki Māori (Māori Strategy) and Mahere reo mō (Māori Language Plan) is led by Te Ohu Māori.</p> <p>Online Tuku Reo – Tikanga and Reo Māori classes piloted in early 2025.</p> <p>We provide a Māori cultural resource for our people, whānau and friends of the Commission 'Te Pikitanga' application (app).</p> <p>Formal and informal education opportunities are offered to build cultural competency in our employees. Regular initiatives led by our employee networks support cultural competence (eg Pacific Language Weeks).</p>	<p>Successful evaluation of Tuku Reo programme by pilot cohort kaimahi.</p> <p>In Wellington, we have an established Te Rōpū Ti Ore Oreo (waiata group) who exist to support CE initiatives and contribute to Te Ao Māori calendar events e.g. Matariki.</p>	<p>Undertake refresh and review of our Rautaki Māori and Mahere Reo programmes of work to 2031.</p> <p>Tuku Reo offered level 2 cohort (drawn from pilot level 1 cohort) and new level 1 cohorts commenced.</p>
<b>Te Taunoa o te Mahi Pīngore   Flexible-work-by-default</b>	<p>Our flexible working policy has been refreshed to ensure our approach enables access to flexible working options for all roles. Consideration of requests is to be free from discrimination and career progression and pay are not to be affected.</p> <p>Guidance for people leaders and employees is available on our intranet. Our flexible working guidelines are aligned to the latest Public Service Commission guidance.</p>	<p>Equitable access to flexible working is available to all Commission employees.</p>	<p>Continue monitoring, promoting and supporting flexible working at the Commission.</p>

