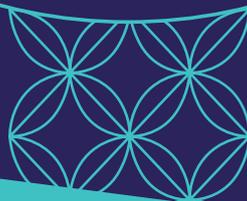


Kia Toipoto

Closing Gender, Māori, Pacific and Ethnic Pay Gaps

Public Service Action Plan
2021-24



Guidance

Crown Entities' Pay Gaps Action Plan
May 2022



Te Kawa Mataaho
Public Service Commission



Manatū Wāhine
Ministry for Women

Te Puni Kōkiri
MINISTRY OF MĀORI DEVELOPMENT

Ministry for Ethnic Communities
Te Tari Mātāwaka

Pacific Peoples
Ministry for Pacific Peoples

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Te kupu whakataki | Introduction

Purpose of this guidance

This guidance supports Aotearoa New Zealand Crown entities to develop and publish their first annual pay gaps action plans (action plan) under [Kia Toipoto – the Public Service Gender, Māori, Pacific and Ethnic Pay Gap Action Plan 2021-24](#).

Publishing an annual action plan will meet the Kia Toipoto milestone: *Te Pono | Transparency: Agencies and entities publish annual action plans based on gender and ethnicity data and union/employee feedback*.

Kia Toipoto

Kia Toipoto builds on the achievements and success of the [Public Service Gender Pay Gap Action Plan 2018-2021](#). Kia Toipoto is, however, even more ambitious.

The Kia Toipoto three-year goals are 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.

Kia Toipoto provides a common but flexible framework that allows entities to tailor actions to reflect their context and the progress they have already made.

Te Whakapiri will provide guidance to help you implement Kia Toipoto

Te Whakapiri is the Kia Toipoto collaborative working group, with representatives of the Equal Pay Taskforce in Te Kawa Mataaho | Public Service Commission, Te Rūnanga o Ngā Toa Āwhina, Te Pūkenga Here Tikanga Mahi | Public Service Association (PSA), Manatū Wahine | Ministry for Women, Te Puni Kōkiri, the Ministry for Pacific Peoples, the Ministry for Ethnic Communities, and employee-led networks (rainbow, disabled and pan-Asian).

Te Whakapiri consults with PSA networks (including the PSA Pasifika Network and PSA Out@Work), and with other agencies and entities.

Over the next 12 months, Te Whakapiri will:

- review and strengthen the guidance developed under the Gender Pay Gap Action Plan 2018-21, to ensure it supports entities to close gender Māori, Pacific and ethnic pay gaps
- develop new guidance to help entities:
 - strengthen career pathways and provide equitable progression opportunities
 - set targets and make progress toward workforces and leadership representation that reflects New Zealand society
 - meet the commitments to Māori, under Kia Toipoto
- share targeted interventions that address barriers facing different groups
- strengthen alignment with other initiatives to create more diverse, inclusive and safe workplaces (see box below).

An action plan is your commitment to system change

An annual pay gaps action plan will help you to:

- increase transparency about pay and representation of women, Māori, Pacific and ethnic employees (including wāhine Māori, Pacific and ethnic women) by:
- strengthening your focus on workforce pay and representation data by gender and ethnicity
- strengthening the quality of your ethnicity data if necessary. (See our guidance on [Measuring and beginning to address Māori and Ethnic Pay Gaps in the Public Service](#) and on [Workforce Information Standards](#))
- strengthening your engagement with women, Māori, Pacific and ethnic employees and employees from rainbow and disabled communities and union representatives. The experiences of diverse employees are the ultimate test of whether you are making and sustaining gains.

Your action plan is also a tool for:

- planning how to meet the Kia Toipoto milestones
- tracking and reporting on progress
- monitoring and reviewing the effectiveness of your actions.

Foundation documents and supporting resources

In developing your plan, please refer to:

- [Kia Toipoto: Public Service Pay Gaps Action Plan 2021-24](#)
- [The Equal Pay Taskforce's guidance and resources](#)

Timeframe

The timeframe for publishing your 2022 action plan is by 31 December 2022. You can publish your action plan earlier. Note that you can update your plan throughout the year.

On publication, please also send your action plan to the Equal Pay Taskforce at EqualPay@publicservice.govt.nz.

Support and queries

The Equal Pay Taskforce is happy to answer any queries. Contact us at EqualPay@publicservice.govt.nz.

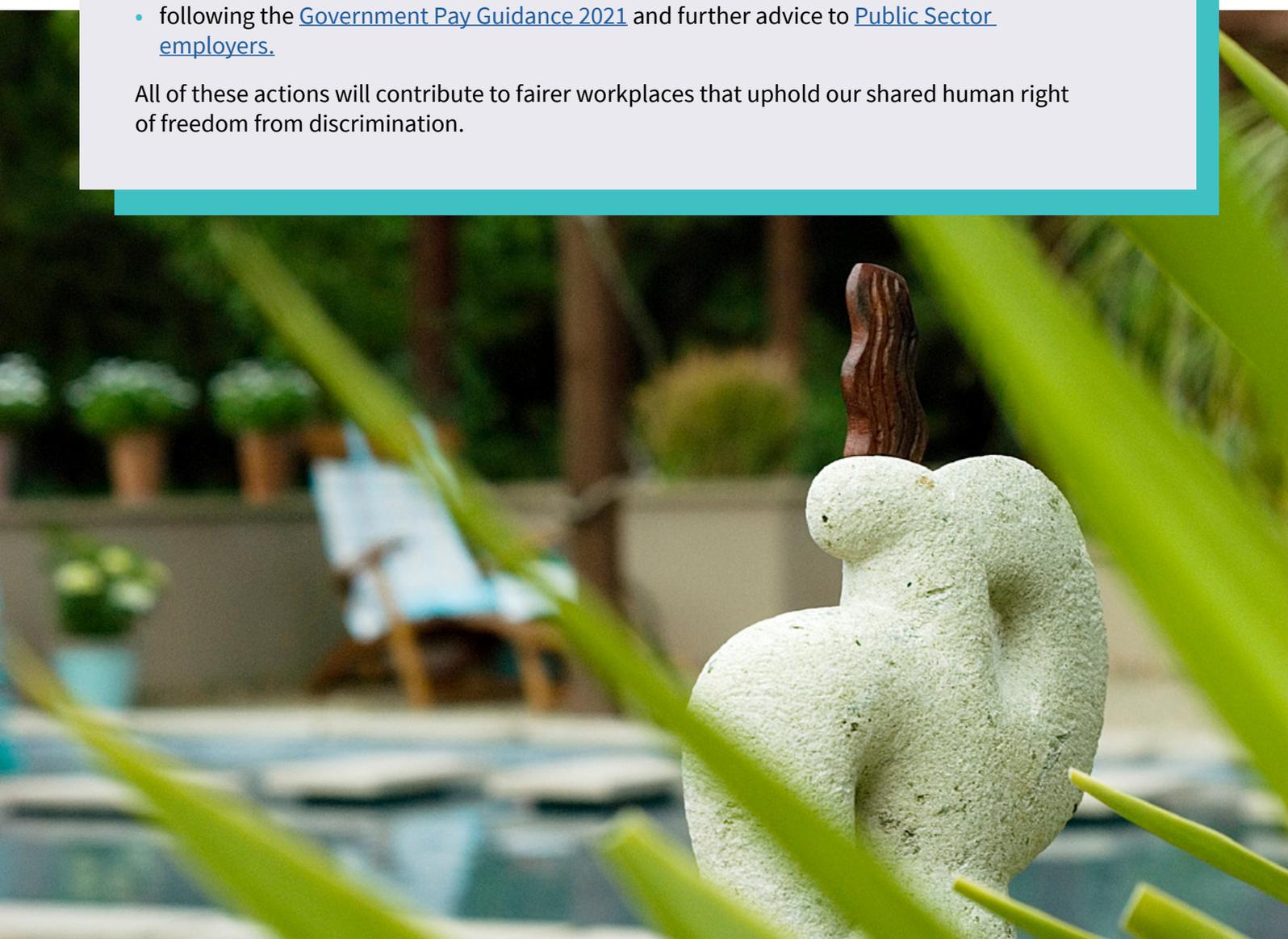
Kia Toipoto is part of the wider diversity, equity and inclusion environment

The Public Service is committed to diversity, equity and inclusion.

By implementing Kia Toipoto, entities will also be:

- working with Māori and working to achieve equitable outcomes for Māori as intended by Te Tiriti o Waitangi
- working with unions
- meeting the expectations of the [Government Workforce Policy Statement](#) for employment relations
- meeting the [Gender Pay Principles for the State Sector](#)
- meeting the obligations of chief executives under the [Public Service Act 2020](#)
- following the [Government Pay Guidance 2021](#) and further advice to [Public Sector employers](#).

All of these actions will contribute to fairer workplaces that uphold our shared human right of freedom from discrimination.



Key steps and actions for creating an annual plan



Summary

In 2022, Crown entities' action plans should include:

- how you are engaging with employees and unions on Kia Toipoto
- gender and ethnic pay gaps (where there are sufficient data and numbers of employees in groups to enable gaps to be calculated) and representation data
- a description of what you have already done and will do that contributes to progress under Kia Toipoto
- specific mention of progress on the 2022 equitable pay and leadership and representation milestones
- a commitment to implementing Kia Toipoto.

Please respond to every section of the template below. If for any reason you can't include the information below, please state why.

Agency action plans for 2021 are published on the Ministry for Women [website](#), as well as agencies' own websites. Many plans have very good elements, including these:

Large agency [Department of Corrections](#)

Medium agency [New Zealand Customs Service](#)

Small agency [Social Well-Being Agency](#)

Developing your pay gaps action plan

Step 1. Proactively engage people across your entity to develop your action plan

Kia Toipoto Milestones & Commitments	Explanatory notes and advice	What to include in your Plan
<p>Kia Toipoto focus area: Transparency</p> <p>Milestone: Entities publish annual action plans based on gender and ethnicity data and union/employee feedback.</p> <p>Kia Toipoto commitments: Māori participate in action and monitoring.</p> <p>Agencies and entities will engage with unions and employees from the earliest planning stages.</p>	<p>Engagement with unions and Māori, Pacific and ethnic employees and employees from rainbow and disabled communities from the earliest planning stages. Doing this will help ensure that your plan is robust and is seen to be so. Understanding employee and union perspectives provides essential evidence about your progress. It also ensures employees can see that their experiences are influencing the actions entities are taking. You can ensure you engage widely by working with your Diversity and Inclusion leads, employee-led Networks, and Māori and other union delegates. Entities without employee-led networks can support their establishment. Smaller agencies/entities can support employees to join cross-agency networks.</p>	<p>Describe how your entity has developed your action plan with unions, women, Māori, Pacific and ethnic employees and employees from disabled and rainbow communities.</p>

Step 2. Measure and analyse pay and representation data. Calculate pay gaps: your organisation-wide gender, Māori, Pacific, and ethnic pay gaps by mean and median

Kia Toipoto Milestones & Commitments	Explanatory notes and advice	What to include in your Plan
<p>Kia Toipoto focus area: Transparency</p> <p>Milestone: Entities publish annual action plans based on gender and ethnicity data and union/employee feedback.</p> <p>Kia Toipoto commitment: Entities include data and actions to achieve equitable outcomes for Māori in action plans.</p>	<p>Measurement guidance. Before embarking on this step please refer the following guidance:</p> <ul style="list-style-type: none"> • Organisational Gender Pay Gaps Measurement and Analysis guidelines • Measuring and beginning to address Māori and Ethnic Pay Gaps <p>Quality of data. This is a good opportunity to improve your data. Good quality data meets the Te Kawa Mataaho Standards of Workforce Information for State Sector Agencies and guidance on collecting disability information. It may take time to develop systems and processes to meet these standards. If your data does not meet these standards, we recommend you:</p> <ul style="list-style-type: none"> • use and report the data you have, as an indicative base and note areas which do not meet standards • include your disclosure rates (e.g., the percentage of employees who have disclosed their ethnicity etc), to help readers interpret your pay and representation data • prioritise making changes to your systems for collecting and reporting workforce information. <p>Note that (as at May 2022) the Workforce Information Standard on gender will be updated to reflect StatsNZ’s new gender standard, i.e.</p> <ul style="list-style-type: none"> • male • female • another gender. <p>Include employees of another gender in your pay and representation information if you can do so without breaching their privacy or confidentiality.</p> <p>Employees who do not identify as cisgender. Organisational Gender Pay Gaps Measurement and Analysis Guidelines p.9 has advice on how to include employees who do not identify as cisgender in pay gap calculations (as ‘another gender’). If this group is too small for statistical comparison (i.e., fewer than 20 people), you should still consider whether the data suggests pay differences exist for these employees.</p>	<p>Pay data</p> <p>Entity-wide gender, Māori, Pacific and ethnic pay gaps:</p> <ul style="list-style-type: none"> • mean calculations • median calculations <p>A table of average pay by gender and ethnicity (as per the example on page 10)</p> <p>More detailed pay gaps, if possible. More detailed calculations are optional for Crown entities in 2022, but include them if you can. Larger entities should be able to include pay gaps such as:</p> <ul style="list-style-type: none"> • for the same or similar roles • by management and leadership level (tiers 2 and 3) • by occupational group and/or within groups or units. <p>Representation data</p> <p>Overall representation of women, Māori, Pacific and ethnic employees.</p> <p>The proportion women, Māori, Pacific and ethnic employees in tiers 1-3</p> <p>Your ethnicity data disclosure rate.</p> <p>Other</p> <p>Total number of employees in your organisation.</p> <p>Definitions of ‘pay’ and ‘employee’ you have used in your calculations.</p> <p>Date on which you measured your data.</p>

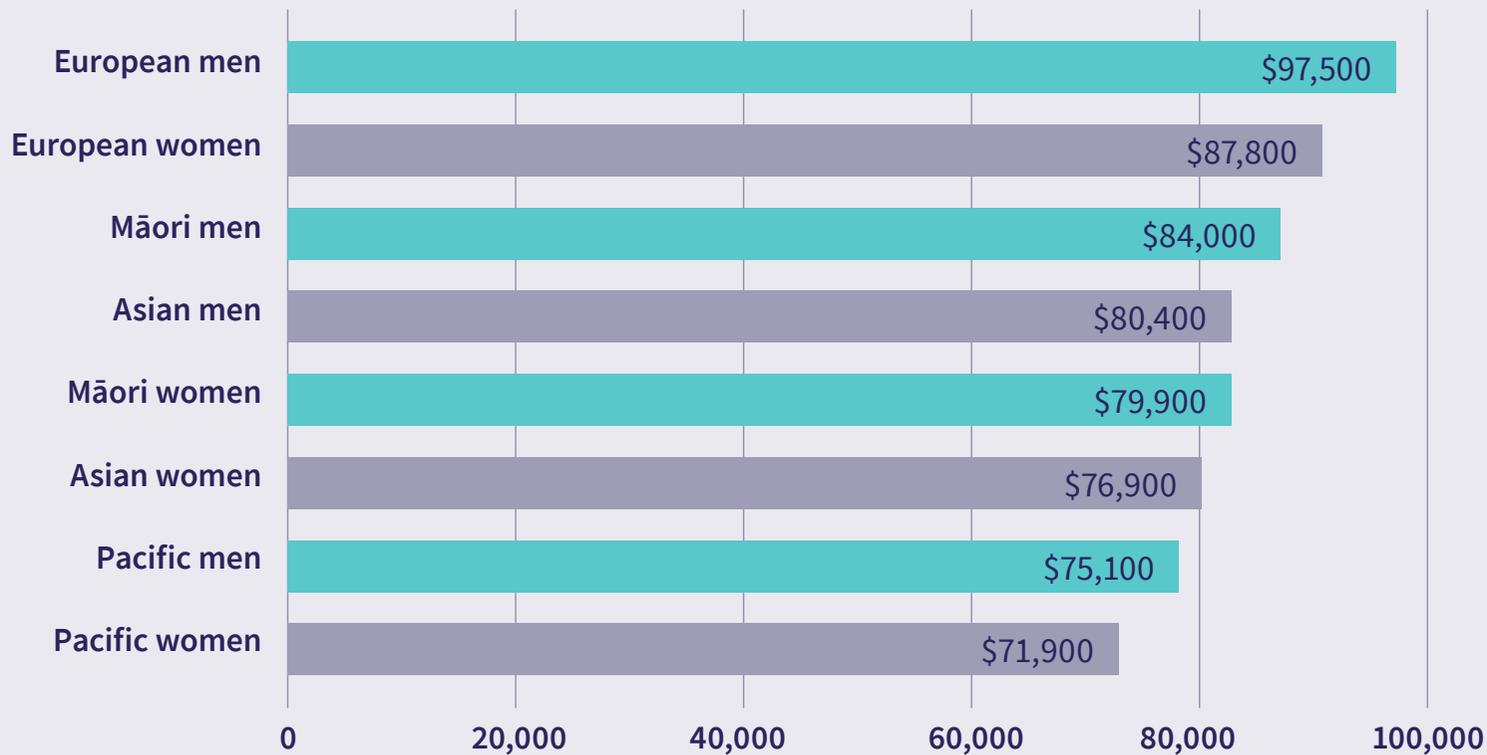
Step 2 cont. Measure and analyse pay and representation data. Calculate pay gaps: your organisation-wide gender, Māori, Pacific, and ethnic pay gaps by mean and median

Kia Toipoto Milestones & Commitments	Explanatory notes and advice	What to include in your Plan
<p>Kia Toipoto focus area: Transparency</p> <p>Milestone: Entities publish annual action plans based on gender and ethnicity data and union/employee feedback.</p> <p>Kia Toipoto commitment: Entities include data and actions to achieve equitable outcomes for Māori in action plans.</p>	<p>Small numbers. Gender and ethnic pay gap calculations are only statistically robust if there are 20 or more people in each comparative group. If your entity has fewer than 20 people in each group, we recommend you still review this data as it can provide useful indicative information, especially for smaller entities. In this case you can include a narrative about what this data suggests, rather than the data itself, OR you can aggregate data for groups of fewer than 20 into larger groups and report this higher-level data. For more information on dealing with small numbers, see: Guide Implementing Kia Toipoto in small organisations.</p> <p>An example of wording explaining why a small organisation is not publishing a pay gap, based on the Social Well-Being Agency’s 2021 Gender Pay Gap Action Plan:</p> <p><i>Our size means we do not meet the threshold to produce statistically robust gender or ethnic pay gap statistics. Changes in our staffing (even small changes) can impact significantly on our pay gap statistics and make our figures volatile. Since we cannot report our pay gap data, we use other information, such as trends, our workforce profile, people data and recruitment statistics, to help indicate our progress.</i></p> <p>Privacy. There may also be privacy issues associated with publishing information about smaller groups. You can be certain that the privacy of individuals is protected if you include pay gaps in your published action plans only when there are at least 20 employees in each group being compared. Entities’ own privacy and confidentiality policies may allow data for groups of fewer than 20 employees to be shared. Discuss this with your privacy officer.</p> <p>Include data definitions in your plan. For instance, state who is included in each group you are measuring. This will ensure measurements made over time are consistent and comparable.</p> <p>Average salaries of employees from each ethnic/gender group. Present the average pay of each ethnic/gender group in a graph, such as the one published annually by Te Kawa Mataaho, see below. This is a simple way of comparing pay across a large number of groups. There is advice on analysing pay by gender and ethnicity combined in Measuring and beginning to address Māori and ethnic pay gaps.</p>	

Step 2 cont. Measure and analyse pay and representation data. Calculate pay gaps: your organisation-wide gender, Māori, Pacific, and ethnic pay gaps by mean and median

Example table of average pay by gender and ethnicity

Public Service average pay by gender and ethnicity 2021



Step 2 cont. Measure and analyse pay and representation data. Calculate pay gaps: your organisation-wide gender, Māori, Pacific, and ethnic pay gaps by mean and median

Example table for reporting gender and ethnic representation

	Workforce representation %	All managers %	Leaders Tiers 1-3 %
GENDER			
Male			
Female			
Another gender*			
ETHNICITY**			
European			
Māori			
Asian			
Pacific Peoples			
Middle Eastern/Latin American/ African			
Other			

*NB only include employees of another gender if you can do so without breaching their privacy or confidentiality.

**NB that we have ethnicity data for X% of employees

Step 2 cont. Measure and analyse pay and representation data. Calculate pay gaps: your organisation-wide gender, Māori, Pacific, and ethnic pay gaps by mean and median

Kia Toipoto Milestones & Commitments	Explanatory notes and advice	What to include in your Plan
	<p>Other advice.</p> <p>Do not include your chief executive in your pay data, as this can skew your mean pay gaps, and in smaller organisations, can make your pay gaps volatile. (Agencies do not include CEs in their pay gaps).</p> <p>Do include your chief executive in your representation data. In this case, one person does not skew the data, and contributes to organisation and sector-wide measures of gender and ethnic representation.</p> <p>Use the most recent data available to update your gender and ethnicity pay and representation measurement. Include the date on which you measured your data.</p> <p>Include the definitions of ‘pay’ and ‘employee’ you have used in your calculations:</p> <ul style="list-style-type: none"> • Definition of employee: Departments and Departmental agencies use the following definition: permanent and fixed term staff, including secondees out, but not secondees in. Don’t include your chief executive in your pay gap calculations. Do include your chief executive in your representation data. • Definition of pay: State whether gaps are for base pay or total remuneration, and your definition of these (if applicable). We encourage organisations to include gaps for base pay and total remuneration if total remuneration is a factor in pay in your organisation. <p>Include the total number of employees in your organisation. This data, combined with representation information, helps Te Kawa Mataaho to build a picture of representation across Crown entities.</p> <p>Note that the Treasury guidance Preparing the Annual Report 2022 encourages Crown entities to include representation by ethnicity and gender, and headcounts, for their workforce and leadership.</p>	

Step 3. Identify and describe the drivers of your entity's gender and ethnic pay gaps

Kia Toipoto Milestones & Commitments	Explanatory notes and advice	What to include in your Plan
<p>Kia Toipoto focus area: Transparency</p> <p>Milestone: Entities publish annual action plans based on gender and ethnicity data and union/employee feedback.</p> <p>Kia Toipoto commitments: Māori participate in action and monitoring. Entities will include data and action to achieve equitable outcomes for Māori in action plans.</p>	<p>Contextual information about pay gaps. Before undertaking this step, refer to the following sources of information about the common drivers of pay gaps. This will help you understand what your data is telling you:</p> <ul style="list-style-type: none"> • Introduction to Kia Toipoto provides a brief overview of the drivers of pay gaps • Appendix 1 of Organisational gender pay gaps Measurement and analysis guidelines, provides more detail about how patterns in data provide evidence of the drivers of pay gaps <p>Gathering and analysing employee and union feedback. The experiences of unions, women, Māori, Pacific and ethnic employees and members of rainbow and disabled communities provide essential qualitative evidence about the impact of your work. In larger entities, the experiences of unions and diverse employees will add to your understanding about why the patterns in your data exist. For smaller entities with less robust data, union and employee feedback provides a vital source of evidence about the progress you are making. You can also gather feedback from managers and leaders about their experiences of applying relevant policies.</p> <p>For more information on gathering qualitative in small organisations, see: Guide Implementing Kia Toipoto in small organisations.</p>	<p>Describe how your entity has developed your action plan with unions, women, Māori, Pacific and ethnic employees and employees from disabled and rainbow communities.</p>

Step 3 cont. Identify and describe the drivers of your entity's gender and ethnic pay gaps

Kia Toipoto Milestones & Commitments	Explanatory notes and advice	What to include in your Plan
<p>Kia Toipoto focus area: Transparency</p> <p>Milestone: Entities publish annual action plans based on gender and ethnicity data and union/employee feedback.</p> <p>Kia Toipoto commitments: Māori participate in action and monitoring. Entities will include data and action to achieve equitable outcomes for Māori in action plans.</p>	<p>Please include a narrative about what your data is telling you. These questions can help you identify patterns in your data that reveal the drivers of your pay gaps.</p> <ul style="list-style-type: none"> • Are there differences in: the representation of women, Māori, Pacific and ethnic employees in higher and lower paid occupational groups; the representation of gender, Māori, Pacific and ethnic employees in different levels e.g., management and/or leadership roles? • Are there pay gaps in starting salaries for employees within the same or similar roles? • Is progress through bands/scale slower or faster for some groups than others? • Are there pay gaps in different parts of your entity e.g., work sites or organisational groups? <p>Please include a narrative about the feedback you have received from unions, women, Māori, Pacific and ethnic employees. These questions can help you:</p> <ul style="list-style-type: none"> • How are perceptions of fairness different for different groups? In what ways are employees from different groups having positive or negative experiences of decisions related to recruitment, remuneration, development opportunities, flexible work, career progression, breaks or leave? • In what ways are employees from different groups experiencing bias and/or discrimination in their day-to-day interactions with leaders, managers and/or colleagues? 	<p>Describe how your entity has developed your action plan with unions, women, Māori, Pacific and ethnic employees and employees from disabled and rainbow communities.</p>

Step 4. Report progress to date against the 2022 Kia Toipoto milestones

Kia Toipoto Milestones & Commitments	Explanatory notes and advice	What to include in your Plan
	<p>A recommended format for reporting progress. A table format enables stakeholders to track progress in key areas over time. The example below is based on the Manatū Taonga and Ministry of Business, Innovation and Employment/MBIE gender pay gap action plans over the last few years. The example is for you to adapt.</p>	

Example: A recommended format for reporting progress

Kia Toipoto focus area and milestones	Current status	Planned actions 2022 and status		Planned actions 2023	Success factors for 2023 actions
<p>Te whai kanohi i ngā taumata katoa Leadership and representation</p> <p><i>By the end of 2022 agencies/entities have plans and targets to improve gender and ethnic representation in their workforce and leadership</i></p>	<p>On track – the plan including targets will be discussed by ELT in January 2023. Our plan includes strengthening Maori representation in leadership, and Asian representation across the workforce. Related work is needed to strengthen our workforce data: we have an 80% disclosure rate for ethnicity.</p>	<p>Measure and analyse gender and ethnicity across the workforce and by leadership level.</p>	<p>Completed</p>	<p>Implement the plan to improve gender and ethnic representation including:</p> <ul style="list-style-type: none"> • Reviewing attraction and recruitment policies and processes in line with Kia Toipoto guidance • Hold training information sessions for managers and employees • Strengthen workforce data collection. 	<ul style="list-style-type: none"> • Completed review of attraction and recruitment policies and processes with engagement of employees and unions • Identified specific areas to change • A work programme is in place to implement changes
		<p>Draft plan in consultation with employees and unions</p>	<p>Completed</p>		

Step 4 cont. Report progress to date against the 2022 Kia Toipoto milestones

Kia Toipoto Milestones & Commitments	Explanatory notes and advice	What to include in your Plan
<p>Kia Toipoto focus area: Equitable pay outcomes</p> <p>Milestones: by end of 2022, entities ensure that starting salaries and salaries for the same or similar roles are not influenced by bias.</p>	<p>Starting salaries. Please outline how you have ensured bias is not a factor in starting salaries in line with the recommendations in Ensuring bias is not a factor in starting salaries.</p> <p>Same or similar roles. Please outline how you have ensured bias is not a factor in salaries for the same or similar roles in line with the recommendations in Ensuring bias is not a factor in the same or similar roles.</p> <p>Refer to the key points in:</p> <p>Guidance: Ensuring bias does not influence starting salaries</p> <p>Guidance: Ensuring bias does not influence salaries for the same or similar roles</p> <p>Public Service Pay Guidance 2021. Note this guidance prioritises addressing gender and ethnic pay inequities. Taking action to close pay gaps under Kia Toipoto, is therefore, consistent with this guidance.</p>	<p>What you have done to ensure bias is not a factor in starting salaries or existing salaries for the same or similar roles.</p>
<p>Kia Toipoto focus area: Leadership and representation</p> <p>Milestone: by end of 2022, agencies/ entities have plans and targets to improve gender and ethnic representation in their leadership</p> <p>Kia Toipoto commitments: Māori will have career paths that empower them to achieve their career aspirations. Māori will be influential at all levels of the workplace</p>	<p>Kia Toipoto guidance. Te Whakapiri will be releasing guidance this year on setting leadership targets and increasing gender and ethnic representation in leadership. In the meantime, for advice on bias-free recruitment, progression, career breaks, leave and flexible-working policies and practice you can refer to the following guidance published to support the Gender Pay Gap Action Plan: Guidance on Recruitment and on Career progression, breaks and leave and Flexible-work-by-default. All this guidance will help you recruit and grow a more diverse pipeline of future leaders.</p> <p>Definition of leadership. This means tiers 1-3 leaders.</p> <p>Definition of gender balanced leadership. This means that women hold between 40-60% of leadership roles at any given time, and an average of at least 50% of leadership roles over the medium-term. The distinction between short and medium-term targets recognises that, especially in small agencies, changes in one or two leaders can have a big impact on annual diversity data. In these cases, medium-term trends are a more reliable indicator of improvement.</p> <p>Definition of ethnic balance in leadership. Ethnic balance means entities should aim for ethnic representation in line with ethnic representation in the overall Aotearoa New Zealand population.</p> <p>Entities with small leadership teams should aim to achieve both ethnic and gender diversity over the medium-term for the reasons outlined in the note on gender balanced leadership above.</p>	<p>A summary of your plan to improve gender and ethnic representation in your workforce and leadership.</p> <p>Targets for gender and ethnic representation in your workforce and leadership.</p>

Step 5. Describe actions you have taken or will take to meet future Kia Toipoto milestones

Kia Toipoto Milestones & Commitments	Explanatory notes and advice	What to include in your Plan
<p>Kia Toipoto focus area: Effective career and leadership development</p> <p>Milestone: 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>Kia Toipoto focus area: Eliminating all forms of bias and discrimination</p> <p>Milestone: 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>Te Whakapiri will be releasing strengthened guidance this year to support you to meet both these milestones. In the meantime, you can refer to the following guidance published to support the Gender Pay Gap Action Plan 2018-21:</p> <p>Guidance on Recruitment</p> <p>Remuneration</p> <p>Career progression, breaks and Leave</p> <p>You may be taking actions in other focus areas of Kia Toipoto, or related work in diversity and inclusion, and wish to include it here. This is optional. See the focus areas in Kia Toipoto and Guide Implementing Kia Toipoto in small organisations.</p>	<p>Actions you are planning to take in 2023 to meet the 2023 milestones of Kia Toipoto. Include these in a table of planned actions by focus area, see Step 4 above.</p> <p>Additional information about related work (optional).</p>

Step 6. Publish your plan to your external-facing website

Kia Toipoto Milestones & Commitments	Explanatory notes and advice	What to include in your Plan
<p>Kia Toipoto focus area: Transparency</p> <p>Milestone: Entities publish annual action plans based on gender and ethnicity data and union/employee feedback.</p>	<p>We recommend that your plan complies with the Accessibility Charter.</p> <p>Note that the Treasury guidance Preparing the Annual Report encourages Crown entities to refer to progress under Kia Toipoto in their annual reports, by including:</p> <ul style="list-style-type: none"> • gender, Māori, Pacific and ethnic pay gaps by median and mean at an organisational level (where entities have enough employees to calculate these gaps) • a link to their published pay gaps action plan • a statement about progress towards meeting the Kia Toipoto milestones. 	<p>A statement about your organisation’s commitment to implementing Kia Toipoto.</p>

