



Public Service Commission

Te Kawa Mataaho

31 July 2026

9(2)(a) privacy

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Official Information Request

Our Ref: OIA 2026-0166

I refer to your Official Information Act 1982 (OIA) request received by the Public Service Commission Te Kawa Mataaho (the Commission) on 9 June 2026 for the following information.

This request is one of three complementary OIA requests filed as part of a coordinated public-interest inquiry. A primary OIA has been filed with Health New Zealand | Te Whatu Ora regarding the January 2024 rainbow cervical screening campaign materials HE1191 and HE1192, which replaced the terms "women" and "female" with "people with a cervix." This secondary request is directed to the Commission to establish whether any whole-of-government guidance, standard, or directive issued by the Commission required or recommended the removal of sex-based language from public-facing government health communications - as distinct from internal employment or workplace policies.

I note the following relevant legislative and policy context: section 75 of the Public Service Act 2020 requires chief executives to foster inclusive workplaces; and guidance published on Digital.govt.nz under the heading "Gender-inclusive language" instructs government agencies to use gender-neutral language and to "not reference gender unless absolutely necessary." It is a matter of public interest to understand whether such guidance was intended to apply to clinical or health-promotion materials addressing sex-specific conditions.

For ease of reference, we have provided our response under the relevant part of your request below.

Part 1: Whole-of-Government Language Guidance

1.1 Guidance, Circulars and Standards

Please provide:

All guidance notes, circulars, standards or directives issued by the Commission between 1 January 2018 and 31 January 2024 that recommended or required the use of gender-neutral or gender-inclusive language in public-facing government communications (as opposed to internal HR or employment policies).

All documentation relating to whether the Digital.govt.nz inclusive language guidance (under the heading "Gender-inclusive language") was developed by or in consultation with the Commission, including any records of the development process, drafting history, inter-agency consultation, or approval process.

Any guidance issued by the Commission specifically addressing when sex-based language (e.g. "women," "female") should be retained, as opposed to replaced, in health or medical communications targeting sex-specific conditions or populations.

Information publicly available – part one

The following information is covered by part one of your request and is publicly available on the Commission's website at the link provided for in the table below.

Item	Date	Document Description	Website Address
1	11 March 2022	Rainbow inclusive language guide	https://www.publicservice.govt.nz/guidance/rainbow-inclusive-language-guide?searchAnalytics=eyJlbmdpbmVOYW1lIjoicHJvZC10a20iLCJxdWVyeVN0cmVlZyI6ImdlbmRlcilslmRvY3VtZW50SWQlOiJzaWx2ZXJzdHJpcGVfY21zX21vZGVsX3NpdGV0cmVlXzI4MSIsInJlcXVlc3RlZC16IiYzUTFTQ0VBVDNLlXg2clJMOXdQZlEifQ%3D%3D
2	Unknown	Glossary - Rainbow commonly used terms	https://www.publicservice.govt.nz/guidance/glossary/diversity-and-inclusion
3	29 June 2020	Pronoun use in email signatures	https://www.publicservice.govt.nz/guidance/pronoun-use-in-email-signatures?searchAnalytics=eyJlbmdpbmVOYW1lIjoicHJvZC10a20iLCJxdWVyeVN0cmVlZyI6ImdlbmRlcilslmRvY3VtZW50SWQlOiJzaWx2ZXJzdHJpcGVfY21zX21vZGVsX3NpdGV0cmVlXzI4MSIsInJlcXVlc3RlZC16IiYzUTFTQ0VBVDNLlXg2clJMOXdQZlEifQ%3D%3D

Accordingly, I have refused your request for the documents listed in the above table under section 18(d) of the OIA on the grounds the information requested is or will soon be publicly available.

Information being released – part one

The Digital.govt.nz gender-inclusive language guidance was developed in 2020 by the GCDO (now GDDA) as part of the broader Content Design Guide's inclusive language section. The guidance was intended to support people creating digital content across the New Zealand public sector by providing high-level advice on using language that reflects diversity and avoids assumptions about gender. The content was reviewed by a range of stakeholders including the Commission.

The Commission provided feedback on the draft guidance which included to change the descriptions to match those in the “WeCount” survey that is run. Enclosed and listed in the table below is a document which summarises the development process and some feedback that was given on the guidance.

Item	Date	Document Description	Decision
4	Unknown	Gender-inclusive language guidance	Released in full

Information does not exist – part one

The Commission has not issued any guidance on this topic therefore, we are refusing this part of your request under section 18(e) of the OIA as the information requested does not exist.

Part 2: Public Service Act 2020 - Application to Public-Facing Communications

2.1 Legal and Policy Advice

Please provide:

Any formal advice, legal opinion, or guidance issued by the Commission on whether section 75 of the Public Service Act 2020 (relating to inclusive workplaces) applies to the content of public-facing communications, as opposed to internal workplace policies.

Any briefing papers or correspondence between the Commission and Health New Zealand | Te Whatu Ora (or its predecessor, the Ministry of Health) regarding the application of gender-inclusive language standards to public health communications, covering the period 1 January 2020 to 31 January 2024.

Information does not exist – part two

The Commission has not provided any advice, legal opinion or guidance on whether section 75 under the Public Service Act was applied to public-facing communications.

Therefore, I am refusing this part two of your request under section 18(e) of the OIA as the information requested does not exist.

Part 3: Rainbow Tick and Accreditation Schemes

3.1 Formal Endorsement and Interaction with Communications Content

Please provide:

Any documentation indicating whether the Commission has formally endorsed, recommended, or required Rainbow Tick accreditation (or any equivalent LGBTQ+ accreditation scheme) for public service agencies.

Any guidance issued by the Commission on how Rainbow Tick or similar accreditation standards interact with the content of public-facing government communications.

Any documentation of complaints or reviews received by the Commission relating to the use or removal of sex-based language in government public health materials.

Information does not exist – part three

The Commission has had Rainbow Tick accreditation since 2019. The Commission has not formally required public service agencies to obtain the Rainbow Tick accreditation nor have we located records showing a formal whole-of-government endorsement of recommendation that agencies should obtain this. You can read more about the Commission's Rainbow Tick accreditation through this OIA response published on our website [here](#).

We do not have any guidance on the Rainbow Tick or similar accreditation standards for public facing government communications.

We have completed a search of our records using a range of keywords relevant to your request about the use or removal of sex-based language in government public health materials, those searches did not identify any information within scope of the request.

Therefore, I am refusing part three of your request under section 18(e) of the OIA as the information requested does not exist.

Part 4: Decision-Making Accountability

4.1 Consultation on Cervical Screening Communications

Please provide:

Any records indicating whether the Commission was consulted by Health New Zealand or the Ministry of Health on the language used in the 2023/2024 national cervical screening programme communications, specifically including materials HE1191 and HE1192.

Any correspondence between the Commission and Health New Zealand on the use of gender-inclusive language in health promotion materials, for the period 1 January 2022 to 31 January 2024.

Information does not exist – part four

The Commission was not consulted by Health New Zealand or the Ministry of Health on the subject matter asked in part four of your request. Therefore, we are refusing this part of your request under section 18(e) of the OIA as the information requested does not exist.

If you wish to discuss this decision with us, please feel free to contact Enquiries@publicservice.govt.nz.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Please note that we intend to publish this response (with your personal details removed) on the Commission's website.

Yours sincerely



Nicky Dirks

Manager – Ministerial and Executive Services
Public Service Commission Te Kawa Mataaho

Gender-inclusive language guidance

Getting the public sector involved in the
creation of new guidance



Background

- No guidance on gender-inclusive language.
- Work in this space is taking place across the public service – Stats, PSC, HRC, NGOs and media agencies.

What our peers had to say

The advice we wrote was good but potentially sensitive and needed:

- wider consultation
- more academic research and articles to support it

What we did

- Reached out to the PSC, PSA Out and DIA colleagues
- Connected with Vania Llewellyn, PSC Senior Advisor Diversity and Inclusion
- Who connected us with:
 - Taine Polkinghorne – HRC Human Rights Advisor SOGISC, and
 - Theresa Peters, Senior Advisor Inclusion and Diversity and Chair Rainbow Network
- Who shared it with all 228 Cross Agency Rainbow Network members

What they told us

They loved:

- Tips
- Examples of gender-neutral language

Recommended we change:

- *Non-binary people are people who do not identify as male or female.*

What we did

So we changed it to fit with the descriptions used in WeCount and the PSC guidance:

Non-binary is an umbrella term for gender identities that are neither male nor female.

Benefits

- We're building a community of cross-agency practitioners
- The advice has been validated by peers across the public service
- Our guidance has a distinctly NZ lens
- We've raised awareness of the guidance on Digital
- Future opportunities for cross-agency collaboration

