



TE ĀRAHITANGA | GUIDANCE

Developing Public Service Agency Gender Pay Gap Action Plans

2021 - 2022



Te Kawa Mataaho
Public Service Commission



Manatū Wāhine
Ministry for Women



April 2021

Te kupu whakataki | Introduction

Purpose of this guidance

This guidance supports the development of your agency's 2021-22 gender pay gap (GPG) action plan. Your plan is a key tool to review and develop your strategy and actions to close the GPG, and to help eliminate gender bias and discrimination in your agency.

Context: Agency GPG action plans contribute to wider progress on gender equity, diversity and inclusion

The Public Service is committed to gender equity, and to diversity and inclusion more broadly. Recently, this commitment became stronger and more explicit.

In 2018, efforts to eliminate the Public Service GPG were boosted by the tri-partite [Gender Pay Principles | Ngā Mātāpono Utu Ira Tangata](#), and the [Public Service Gender Pay Gap Action Plan | Te Mahere Mahi Rerekētanga Ira Tangata](#) --a joint initiative of Government, chief executives and the Public Service Association. The Principles provide an enduring framework for achieving working environments free from gender-based inequalities. The 2018-20 Action Plan contains a specific set of milestones to drive progress. Ministers have recently approved continuing this work and a new Action Plan is in development.

Over the same period, pay equity settlements in the Public Service have been reached according to the Pay Equity Principles. These principles have been incorporated in the amended [Equal Pay Act 1972](#). Current claims are being progressed according to the amended Act.

Pay equity settlements in the Public Service were a key driver of the 1.7 percentage point drop in the Public Service GPG between 2018 and 2019. The Gender Pay Gap Action Plan resulted in a further drop between 2019 and 2020. In total the GPG dropped from 12.2% in 2018 to 9.6% in 2020.

More broadly, in 2020 [Papa Pounamu](#) determined five diversity and inclusion priorities for the Public Service and the new [Public Service Act](#) describes the obligation of chief executives to increase diversity and inclusion in their agencies.

By working to increase gender equity and close their GPGs, agencies are not only implementing the GPG Action Plan and the Gender Pay Principles, but they are also progressing the Papa Pounamu priorities and meeting Public Service Act obligations.

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

Purpose of your annual GPG action plan

Your plan will help your agency to:

- understand and monitor trends in GPGs and gender representation
- engage employees and unions in your work to close your GPG

- identify the impact of actions you have taken to date
- decide if your actions need adjustment or new actions are needed
- be transparent and accountable about progress and challenges
- signal your commitment to fairness, to implementing the [Gender Pay Principles](#) and to closing your GPG
- align your agency's gender strategy with diversity and inclusion commitments in the [Public Service Act \(Section 75\)](#)
- model action and transparency to employers in other sectors.

Your plan also helps the Gender Pay Taskforce to:

- monitor and celebrate system progress, and report to stakeholders
- identify and share good practice and innovative ideas
- identify and provide for system and agency support needs
- build an evidence base of what works to close GPGs.

Foundation documents and supporting resources

In developing your plan, please refer to:

- [The Gender Pay Principles | Ngā Mātāpono Utu Ira Tangata](#) which provide a framework to ensure working environments in the state sector are free from gender-based inequalities and that all employees are able to achieve their full potential regardless of their gender, and gender pay gaps are eliminated
- [The Public Service Gender Pay Gap Action Plan | Te Mahere Mahi Rerekētanga Ira Tangata](#) which contains a specific set of milestones to drive progress
- The Gender Pay Taskforce's guidance and resources
<https://www.publicservice.govt.nz/our-work/the-gender-pay-gap-and-pay-equity/>

Deadlines

- The deadline for completing your GPG action plan is **31 August 2021**. Please send your completed action plan to GenderPayGap@publicservice.govt.nz
- The deadline for publishing your plan on your website is **30 September 2021**.

You can submit and publish your plan earlier.

Support and queries

The Taskforce is happy to review your draft plan and answer any queries. Contact us at GenderPayGap@publicservice.govt.nz.

GUIDANCE: DEVELOPING A PUBLIC SERVICE AGENCY GENDER PAY GAP ACTION PLAN 2021-22

| Step 1. Proactively engage people across your agency to develop your action plan | |
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| <p>Gender Pay Principle 5 Participation and Engagement: <i>Employees, their unions and agencies work collaboratively to achieve mutually agreed outcomes</i></p> | <p>Co-develop your plan with employees and unions from the earliest stages</p> <p>This will ensure all employees and unions have contributed to and are aware of the commitments in the plan and know how to access it.</p> <p>Employees and unions can help you evaluate the impact of your 2020 plan and refine your plan for 2021. Their full involvement provides assurance that your plan is robust and supports addressing the drivers of GPGs in your agency.</p> <p>Include a diverse range of employees, to gain the value from different perspectives. Māori and Pacific policy teams with an internal focus, employee-led networks, and unions can help you consult with a diverse group of employees.</p> <p>There is information in section two about engaging with employees and unions while maintaining privacy.</p> <p>Describe how your agency worked with employees and unions to develop your plan.</p> |
| Step 2. Update your agency gender pay and representation measurements, including ethnicity | |
| <p>Organisational gender pay gaps Measurement and analysis guidelines</p> <p>Gender Pay Gap Measurement and Analysis for Public Service Agencies</p> | <p>Use the most recent data available to update your gender pay and representation measurements.</p> <p>Do not include your chief executive, as they are not appointed or remunerated by your agency.</p> <p>Include data definitions e.g. state who is included in each group you are measuring. This will ensure measurements made over time are consistent and comparable.</p> <p>Measures to include in your published action plan</p> <p>Include the following measures, where there are at least 20 men and 20 women.</p> <p>Agency-wide GPG:</p> <ul style="list-style-type: none"> • mean calculation • median calculation |

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| | <p>Calculate GPGs:</p> <ul style="list-style-type: none"> • within the same or similar roles • by level of seniority, including management and leadership (tiers 2 and 3) • by occupational group • within groups or units • by time in the role (tenure) • by age. <p>Calculate the proportion of women in:</p> <ul style="list-style-type: none"> • part-time compared with full-time employment • management and leadership • occupational groups <p>See below for advice on calculating gaps for groups of less than 20 men and 20 women.</p> |
| <p>Organisational gender pay gaps Measurement and analysis guidelines p.9.</p> | <p>Including gender diverse employees</p> <p>If gender diverse employees are identified in your agency, include these employees in GPG calculations as a third group. If this group is too small for statistical comparison (i.e. less than 20 people), you should still try and consider whether pay differences exist for these employees.</p> |
| <p>Gender Pay Principle 1 Freedom from Bias and Discrimination: <i>Employment and pay practices are free from the effects of unconscious bias and assumptions based on gender</i></p> <p>Public Service Workforce Data</p> | <p>Include ethnicity</p> <p>Public Service-wide data shows that ethnic and gender pay gaps compound so that Māori, Pacific, and Asian, women experience bigger pay gaps than European women.</p> <p>Include an analysis of gender pay and representation by ethnicity for your agency.</p> <p>Advice on analysing pay by gender and ethnicity combined is included in Guidance Measuring and beginning to address Māori and ethnic pay gaps in the Public Service, recently published by Te Kawa Mataaho.</p> |

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| Pay by gender and ethnicity | |
| Organisational gender pay gaps Measurement and analysis guidelines p.8 Gender Pay Principle 2 Transparency and Accessibility: <i>Employment and pay practices, pay rates, and systems are transparent. Information is readily accessible and understandable</i> | <p>Reviewing information for fewer than 20 men and 20 women</p> <p>StatsNZ advises that GPGs are not statistically robust for fewer than 20 men and 20 women.</p> <p>We recommend only including statistically robust data in your published GPG action plan.</p> <p>While data for small groups is not statistically robust, reviewing this data can still provide useful indicative information, especially for smaller agencies.</p> <p>Agencies can either:</p> <ul style="list-style-type: none"> • include a narrative about what this review shows, but not include the data itself in the published plan <p>Or</p> <ul style="list-style-type: none"> • aggregate information about groups of fewer than 20 men and 20 women into larger groups so that it can be included in your published plan. |
| | <p>Privacy and information sharing</p> <p>The Privacy Act prohibits agencies from sharing information in such a way that any individual can be identified, without that individual’s permission.</p> <p>You can be certain that the privacy of individuals is protected if you include GPGs in your published action plans only when there are at least 20 men and 20 women in a group.</p> <p>Agencies’ own privacy and confidentiality policies may allow data for smaller groups of employees than 20 men and 20 women to be shared. Discuss this with your privacy officer. To aid transparency and engagement, this more detailed data can be shared with employees and unions when developing your GPG action plans.</p> <p>If groups are small and an individual’s information could be inferred, agencies can protect privacy by aggregating groups.</p> |
| Gender Pay Principle 4 Sustainability: | <p>Include all employment arrangements</p> |

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| <p><i>Agencies consider how these Principles apply to all employment arrangements, including contractors.</i></p> <p>Guidance on Remuneration p. 5</p> | <p>Agencies should also consider other working arrangements, such as self-employed or dependent contractors and/or third party organisations supplying goods or services (including temporary workers).</p> <p>Agencies may not have complete information for all these working arrangements (workforces).</p> <p>Where agencies have sufficient information, include the proportion of women and average pay for these groups.</p> <p>Information for these groups should be reported separately from your agency GPG and representation measures.</p> |
| <p>Step 3. Identify and describe the drivers of your agency's GPG</p> | |
| <p>For possible drivers of GPGs see Appendix 1 Organisational gender pay gaps Measurement and analysis guidelines.</p> <p>Gender Pay Principle 5</p> <p>Participation and Engagement:</p> <p><i>Employees, their unions and agencies work collaboratively to achieve mutually agreed outcomes</i></p> | <p>Analyse your data with employees and unions</p> <p>Employees and unions have knowledge of your workforce that will provide valuable insights about what the data shows. They also bring multiple, diverse perspectives on the possible solutions to identified problems.</p> <p>These questions can help interpret your data and identify the drivers of your GPGs:</p> <ul style="list-style-type: none"> • are there pay gaps in different parts of your agency, in different occupations, at different levels within occupations? • are there pay gaps after employees have been in roles for periods of time? • are there significant differences in the representation of men and women in different occupational groups or levels within occupational groups (including management)? • are there differences by ethnicity for each of these questions? <p>Use the analysis to identify and describe the drivers of your agency's GPGs</p> <p>Include a narrative about your analysis of what the data is showing in your plan.</p> |
| <p>Step 4. Review progress to date and outline plans for 2021-22</p> | |
| <p>For possible drivers of GPGs see Appendix 1 Organisational gender pay gaps Measurement and analysis guidelines.</p> | <p>Review your progress to date</p> <p>Discuss progress to date with employees and unions using questions such as:</p> <ul style="list-style-type: none"> • does the data show that anything has changed – improved or worsened? • have managers, employees, and their union representatives provided any feedback about what is working or not working – e.g. via staff engagement surveys? |

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| | <ul style="list-style-type: none"> • did your actions during 2020 achieve the things you hoped to achieve? • what worked well and what could be improved or done differently? <p>Plan for 2021-22 Based on the data analysis, conclusions about the drivers of your agency’s GPGs, and the review of progress to date, outline the actions your agency will take during 2021-22 to close your GPG.</p> <p>Planned actions should:</p> <ul style="list-style-type: none"> • target all the main drivers of your agency’s GPG • include progress indicators that are specific, measurable and time-bound. |
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Step 5. Report progress on the Public Service GPG Action Plan Milestones

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| <p>The Public Service Gender Pay Gap Action Plan</p> <p>Gender Pay Principle 4 Sustainability <i>Interventions and solutions are collectively developed and agreed, sustainable and enduring</i></p> <p>and</p> <p><i>Collective and/or individual agreements are key mechanisms for ensuring that changes are sustained</i></p> | <p>As well as responding to the drivers of your agency GPG, your plan should describe your progress on the four milestones in the Public Service Gender Pay Gap Action Plan.</p> <p>For each milestone state:</p> <ul style="list-style-type: none"> • the actions you have taken and what has been achieved • evidence of impacts or outcomes e.g. changes reflected in data, in engagement surveys, in feedback from employees and unions, and any outcomes from bargaining flowing from GPG actions • the next steps, with measurable progress indicators, e.g. time frames, dates, targets |
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| <p>Ensuring-gender-is-not-a-factor-in-salaries-for-the-same-or-similar-roles</p> <p>Ensuring-gender-is-not-a-factor-in-setting-starting-salaries</p> <p>Guidance on remuneration</p> | <p>Milestone 1: Equal pay <i>Agencies have ensured gender is not a factor in salaries for the same or similar roles.</i></p> <p>Please describe:</p> <ul style="list-style-type: none"> • what was done to achieve this • how will the agency ensure that gaps do not re-open, e.g. through regular review, monitoring or system changes. <p><i>Note: Applying the Pay Equity Principles to claims raised was included with this milestone in the original Public Service GPG Action Plan. The Pay Equity Principles have now been enacted in the Equal Pay Act, with all pay equity claims progressing under the amended legislation.</i></p> |
| <p>Flexible-Work-by-Default Guidance and Resources</p> | <p>Milestone 2: Flexible work by default <i>Agencies have:</i></p> <ul style="list-style-type: none"> • <i>trialled flexible-by-default practices</i> • <i>flexible-by-default policies and systems in place which are aligned with the flexible-by-default guidance</i> <p>Please describe:</p> <ul style="list-style-type: none"> • your progress on creating a flexible-by-default workplace |
| <p>Recruitment Guidance</p> <p>Guidance on career progression, breaks and leave</p> <p>Guidance on remuneration</p> <p>See Papa Pounamu priority: Addressing bias in the Public Service</p> | <p>Milestone 3: No bias or discrimination in remuneration systems or human resources practices <i>By the end of 2020, agencies have:</i></p> <ul style="list-style-type: none"> • <i>engaged with the Taskforce guidance:</i> <ul style="list-style-type: none"> ○ <i>Recruitment Guidance</i> ○ <i>Guidance on career progression, breaks and leave</i> ○ <i>Guidance on remuneration</i> • <i>a plan and target date for reviewing HR policies and practices with unions and employees to align with this guidance</i> • <i>ensured all managers have completed bias training OR are scheduled to do so within a certain period of starting in their role</i> • <i>a plan in place to provide all relevant staff with bias training on an ongoing basis.</i> <p>Include in your action plan:</p> <ul style="list-style-type: none"> • how your agency is reviewing or has changed your remuneration and HR policies and practices with employees and unions to align with the: |

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| <p>Gender Pay Principles</p> <p>Principle 2 Transparency and Accessibility</p> <p>Principle 4 Sustainability</p> <p>Principle 5 Participation and Engagement</p> | <ul style="list-style-type: none"> ○ Recruitment Guidance ○ Guidance on career progression, breaks and leave ○ Guidance on remuneration <ul style="list-style-type: none"> ● a target date for the review to be completed (or when it was completed) ● the bias training your managers have undertaken or will undertake ● the bias training all your relevant staff, have undertaken or will undertake e.g. HR teams and any others involved in remuneration and/or HR decision-making ● the timeframe for all relevant staff to complete bias training ● any other relevant information, e.g. cultural capability training your employees undertake. |
| <p>Recruitment Guidance</p> <p>Guidance on career progression, breaks and leave</p> <p>Under the new Public Service Act (s75) chief executives must be guided by the principle that public service employees should reflect the makeup of society) Public Service Act</p> | <p><i>Milestone 4: Gender balanced leadership</i> <i>Agencies have a target date and plan for achieving gender balance in their top leadership positions.</i></p> <p>Include the proportion of women in tiers two and three of your agency.</p> <p>Note:</p> <ul style="list-style-type: none"> ● Leadership in agencies means tiers 2 and 3 ● Gender balanced leadership means 40-60% of leadership roles being held by women at any point in time, with an aim of an average of at least 50% of leadership roles being held by women over the medium to long term. <p>If your agency has:</p> <ul style="list-style-type: none"> ● below 40% women in tiers two and three, please include a target date and plan for achieving gender balance ● between 40 and 60% women in tiers two and three, please include a plan for achieving or maintaining gender balance over the medium and long term <p>Include any initiatives or plans to increase the diversity, especially the ethnic diversity, of women in leadership and in your leadership pipeline.</p> |

Step 6. Provide any other information

Include any other information related to closing your gender pay gap and improving gender equity, for example:

- the impact of pay equity settlements in your agency
- initiatives to narrow the gap between the highest and lowest earners, in accordance with [Government Expectations](#)
- other relevant diversity and inclusion initiatives, such as recruiting for increased diversity, mentoring, sponsorship, internships, establishing employee-led networks etc.

Step 7. Publish your plan

[Gender Pay Principle 2](#)

Transparency and accessibility:
Agencies publish plans for addressing gender pay gaps, ensuring that they are readily available to all employees and their unions.

Agency 2020 GPG action plans are on the Ministry for Women website
[Public sector gender pay gap action plans](#)

Publishing your plan

- demonstrates your commitment to closing your GPG and eliminating gender inequality
- strengthens your value proposition for potential employees
- creates models for other employers, in the wider Public Service and private sector
- ensures that your plan is readily available to all employees and their unions, in accordance with Gender Pay Principle 2: Transparency and Accessibility.

Include all the measures in Step 2 (above) in your published plans, unless they are not statistically robust, or there is a privacy risk

The advice in step 2: *Reviewing information about groups of fewer than 20 men and 20 women*, and *Privacy and sharing information* is designed to give agencies confidence in including gender pay and representation measures in their published plans.

Agencies can use a format that suits their own publication requirements. This may include an A3 with a publicly accessible link to the more detailed narrative and data.

Note that Public Service agencies are expected to comply with the [Accessibility Charter](#), which requires information to be available in HTML too.

Please send a link to your published plan to GenderPayGap@publicservice.govt.nz

Publish your plan on your agency website and on your intranet, where it can be easily found.

Agency GPG Action Plan

CHECKLIST

Have you:

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| Step 1. Proactively engaged people across your agency to develop your action plan | <ul style="list-style-type: none"> ✓ Described how you worked with employees and unions to develop your plan |
| Step 2. Updated your agency gender pay and representation measurements, including ethnicity | <ul style="list-style-type: none"> ✓ Included data definitions e.g. who is included in groups you are measuring? ✓ Included your agency-wide GPG: <ul style="list-style-type: none"> ✓ mean ✓ median ✓ Included these GPG measures (where there are 20 men and 20 women to compare) <ul style="list-style-type: none"> ✓ within the same or similar roles ✓ by level of seniority ✓ by occupational group ✓ within groups or units ✓ by time in the role (tenure) ✓ by age OR for groups of fewer than 20 men and 20 women <ul style="list-style-type: none"> ✓ included aggregated information, OR ✓ included a narrative about trends ✓ Included the proportion of women in: <ul style="list-style-type: none"> ✓ part-time compared with full-time employment ✓ management and leadership ✓ occupational groups ✓ Included gender diverse employees |

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| | <ul style="list-style-type: none"> ✓ Included ethnicity ✓ Separately reported all employment arrangements |
| Step 3. Identified and described the drivers of your agency's GPG | <ul style="list-style-type: none"> ✓ Described the drivers of your GPGs |
| Step 4. Reviewed progress to date and outline plans for 2021-22 | <ul style="list-style-type: none"> ✓ Described actions you have taken to close your GPG ✓ Described outcomes of actions you've taken – with evidence ✓ Described how you will target the main drivers of your GPG |
| Step 5. Reported progress on the Public Service GPG Action Plan Milestones | <p>For each of the four milestones, stated:</p> <ul style="list-style-type: none"> ✓ the actions you have taken ✓ what has been achieved – with evidence ✓ the next steps, with measurable progress indicators e.g. time frames, dates, targets |
| <i>Milestone 1: Equal pay</i> | <p>Described:</p> <ul style="list-style-type: none"> ✓ what you did to ensure equal pay within the same role ✓ how you will ensure gaps don't re-open |
| <i>Milestone 2: Flexible work by default</i> | <ul style="list-style-type: none"> ✓ Described your progress on creating a flexible work by default workplace (with evidence) |
| <i>Milestone 3: No bias or discrimination in remuneration systems or human resources practices</i> | <p>Included:</p> <ul style="list-style-type: none"> ✓ how your agency is reviewing (or has reviewed) policies and practices to align with the: <ul style="list-style-type: none"> ○ Recruitment Guidance ○ Guidance on career progression, breaks and leave ○ Guidance on remuneration |

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| | <ul style="list-style-type: none"> ✓ a target date for the review (or when it was completed) ✓ the bias training your managers have undertaken or will undertake ✓ the bias training your relevant staff have undertaken or will undertake ✓ the timeframe for relevant staff to complete bias training |
| <p><i>Milestone 4:</i></p> <p><i>Gender balanced leadership</i></p> | <ul style="list-style-type: none"> ✓ Included the proportion of women in tier 2 and 3 |
| | <ul style="list-style-type: none"> ✓ Included a target date and plan for achieving gender balance (IF you have under 40% women in tiers two and three) OR |
| | <ul style="list-style-type: none"> ✓ Included a target date and plan for achieving or maintaining gender balance over time (IF you have between 40 and 60% women in tiers two and three) |
| <p>Step 6. Provided any other information</p> | <p>Included any other information, e.g.:</p> <ul style="list-style-type: none"> ✓ the impact of pay equity settlements ✓ initiatives to narrow the gap between the highest and lowest earners ✓ other diversity and inclusion initiatives |
| <p>Step 7. Published your plan</p> | <ul style="list-style-type: none"> ✓ Included all the measures in Step 2 (above) unless they are not statistically robust or would compromise privacy ✓ Checked for compliance with the Accessibility Charter ✓ Prepared to publish your whole plan |