



Privacy Commissioner  
Te Mana Mātāpono Matatapu

# Kia Toipoto

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Pay Gaps Action Plan 2025/2026

## Introduction

Set out here is our 2025/2026 Kia Toipoto Pay Gaps Action Plan. This responds to the request from the Public Service Commission for Crown Entities to update and publish their Kia Toipoto plans as a follow-on from their 2022-2024 plans.

The Kia Toipoto overarching 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

Where pay gaps exist, we are conscious that they may arise from:

- occupational segregation, for example women or certain ethnic groups being over-represented in lower-level positions and under-represented in more senior roles and leadership positions;
- career progression stallers such as childrearing breaks for women;
- inequities which might be embedded in policies and procedures; and/or
- unconscious bias and other forms of bias and discrimination which occur informally within our organisation.

As an agency, OPC is committed to upholding the principles of diversity, equity and inclusion in our employment practices across the entire employment life cycle. It's not only the right thing to do as a good employer, it's aligned to our values and purpose as an organisation.

We want our employment practices to be fair and equitable and to be seen by existing and prospective staff that it is. We actively seek to increase diversity in the make-up of our staff because we believe that a diverse workforce helps us to more effectively deliver our services to the communities and audiences we serve.

We are a small Independent Crown Entity of 50 staff. Our size means we do not meet the threshold to be able to produce statistically meaningful pay gap information and at the same time protect the privacy of our staff. Trending pay gap data for small datasets is likewise statistically unreliable in that even small changes in staff can have significant impacts on our demographics. What we do is look to the continuous improvement of our policies and practices around diversity, equity and inclusion, informed by the HR information we have, relevant external research and resources, supported by consultation with, and with feedback from staff.

## Summary:

- Women are well represented in our senior leadership and management, as they are across all of our other operational roles and pay bands. At the T2 senior leadership level, we have historically had at least half the positions held by women, and this currently sits at 100%<sup>1</sup>. There is a similar pattern over the last five years at the T3 management level where we have more women leaders at T3 than men.
- At T4 level (our front line), we have roles across a range of business functions from strategy and insights, compliance and enforcement, policy, capability and guidance, investigations and dispute resolution, communications and engagement, legal, and corporate services. Our workforce is gender diverse, with women in the majority across all of our business functions and roles (circa 75% female).
- For privacy reasons, we do not ask staff to self-identify their gender, ethnicity, disability, or if they are part of the Rainbow community. While we know from experience that we have a diverse team at OPC, we also know we are not as successful as we would like to be in attracting Māori and Pacific Peoples job candidates generally and this is reflected in our current population profile.
- Our organisational knowledge is that our current staff profile shows a lack of representation of Māori and Pacific Peoples, lower than the Public Service and the general population. The reasons for this are unclear and in 2025/2026 we will continue to identify actions to take to address this, which in reality will occur gradually, and largely through staff turnover. In the interim we continue to develop capability in te ao Māori, tikanga and kawa as demonstrated in this Plan.
- For the 2025/2026 year we undertake to further consult and work with staff to identify areas for improvement in our plans and actions.
- The six focus areas covered in this year's plan are:
  - Transparency
  - Equitable pay outcomes
  - Leadership and representation
  - Effective career and leadership development
  - Elimination of bias and discrimination
  - Flexible-work practices

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<sup>1</sup> For clarity all positions at senior leadership level have been included, with the exception of the Privacy Commissioner (T1 position).

Kia Toipoto Focus Area	What we are doing	Planned actions 2025/2026
<p><b>Focus area 1: Te Pono   Transparency</b></p> <p>Ensure all staff have ready access to HR policies and guidance, including our remuneration framework and pay bands.</p> <p>Staff are consulted on key changes to policies.</p>	<p>Publish the Kia Toipoto action plan in our Annual Report and on our website.</p> <p>Provide staff with open access to our HR policies, including our remuneration, performance management, and professional development policies and guidance.</p> <p>Provide staff with information on our job bands and the indicative remuneration ranges, updated yearly. Incorporate information about HR policies and practices of as part of new staff induction and onboarding.</p> <p>Routinely provide pay transparency in job advertisements for T4 level, using total remuneration.</p>	<p>Continue to review and update HR policies and ensure that they are easily accessible to all staff.</p> <p>Consult staff on any proposed changes to policies and practice guidelines.</p> <p>At least annually seek feedback from staff on the ongoing development and improvement of our Kia Toipoto plan.</p>
<p><b>Focus area 2: Ngā Hua Tōkeke mō te Utu   Equitable pay outcomes</b></p> <p>Ensure starting salaries and salaries for the same or similar roles are equitable and fair.</p>	<p>We review internal and external pay relativity data annually to help ensure remuneration levels set for the same or similar roles are fair, equitable and sustainable.</p> <p>Provide line managers with guidance from HR to support development of pay increase recommendations in our annual pay review process.</p>	<p>Continue current practices to manage the risk of bias in setting pay and ensure fair relativities.</p> <p>Include a mid-term check in the 2025/26 year to confirm the starting remuneration for each new employee has been fairly set.</p> <p>Conduct an overview analysis of starting salaries in the same bands to identify any</p>

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	<p>For our yearly formal pay review, all proposed remuneration recommendations (i.e. for all staff at T3 and T4 level) are reviewed by HR and cross-moderated by our Senior Leadership Team to ensure equitable outcomes and fair internal relativities within groups and across teams.</p> <p>We use a total remuneration approach to ensure pay levels can be compared on a like-for-like basis.</p> <p>For specialist roles, external market data is sourced to support fact-based decision-making and reduce bias.</p> <p>Recruitment decisions are based on skills, experience and job level. We do not use a preferred candidate's current salary as the base to set our salary offer.</p>	<p>patterns which could indicate the presence of bias.</p>
<p><b>Focus area 3: Te whai kanohi i ngā taumata katoa   Leadership and representation</b></p> <p>Commit to developing a workforce that is more representative of society.</p>	<p>All recruitment is managed with active support from HR to ensure processes are fair, practice is consistent and the approach inclusive.</p> <p>We use a behavioural event interviewing framework and an interview panel format where the emphasis is on consensus decision-making. Candidates are invited to bring a support person with them to interview.</p> <p>We have made changes to the way we advertise and recruit for OPC roles with the aim of encouraging a</p>	<p>A review of candidates for vacancies over the previous year indicates we are not attracting a sufficiently diverse range of candidates, notably in respect to Māori and Pacific Peoples coming forward. We want to identify ways we can address this issue - at all stages of the recruitment process.</p> <p>Seek support internally from our Pou Arahi and external advisers/other employers on ways to encourage a diverse range of candidates (particularly Māori and Pacific</p>

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	diverse range of candidates, using different channels to reach different audiences, and increasing the use of te reo in advertising and job descriptions.	<p>Peoples) to come forward when we advertise.</p> <p>Create a dedicated career section of the website to clearly articulate our employee value proposition which will appeal to a diverse range of candidates.</p>
<b>Focus area 4: Te Whakawhanaketanga i te Aramahi   Effective career and leadership development</b>	<p>Developed explicit career progression criteria in a number of key areas. Advised staff that anyone can put forward a case for progression for manager consideration, with a review and final decision at the SLT level.</p> <p>Approved leave for employees to take up a variety of professional development opportunities. Provided secondment opportunities for staff from other agencies, which has increased the diversity within OPC.</p> <p>All staff have a professional development section to complete in the annual review which includes building capability in te ao Māori.</p> <p>Provide support and funding for staff to meet their CPD requirements.</p> <p>Women are well represented (and in the majority) in all our leadership positions at T2 and T3 level but with low to nil Maori representation at these levels.</p>	<p>Identify ways to increase diversity in our leadership group as opportunities present themselves (e.g. through acting-up, secondment, or when vacancies arise).</p> <p>Scope out the value of creating an aspiring leadership programme and pipeline.</p>

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<b>Focus area 5: Te whakakore i te katoa o ngā momo whakatoihara, haukume anō hoki   Eliminating all forms of bias and discrimination</b>	<p>In the 2024/2025 year all staff attended a wananga which included a half-day session on unconscious bias from a Māori perspective.</p> <p>We set up a Māori Champions group, made up of staff from every OPC team, which meets with our Pou Arahi monthly in support of capability development in te ao Māori across the organisation. Each area of OPC has a set of plans for the inclusion of te ao Māori within our workstreams and programmes. Progress to plan is reported monthly with SLT monitoring and support.</p> <p>Project Whatu – we are implementing a project to explore the tikanga that protect personal information and apply them to our privacy work.</p> <p>Expanded the capability and confidence of staff to engage effectively with Māori and in te ao Māori through training in te reo Māori, tikanga, and kawa. This is part of our Mahere Reo strategy, which also includes waiata practice and Wellington staff engagement with mihi whakatau for new staff.</p> <p>Our strategic framework has an objective to work in partnership with Māori to take a te ao Māori perspective on privacy. A Māori Reference Panel has been stood up which ensures a te ao Māori perspective is sought and listened to.</p>	<p>Ongoing review of policies including identifying any content which indicates bias or could lead to bias in its application.</p> <p>Delivery of ongoing training on mitigating bias in decision making, increasing cultural competency across the organisation.</p> <p>Ongoing delivery of programmes and wānanga to build te reo and tikanga capability within the organisation.</p> <p>Continue receiving support from the external Māori Reference Panel.</p> <p>Continue to develop strong partnerships with and across Māori, with these partnerships helping to shape our priorities and approaches to work.</p> <p>Continue to include a section in staff professional development plans for capability with te ao Māori.</p> <p>Continue to identify suitable learning and development resources for managers and staff.</p>



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	<p>Progressive training year on year on the history and meaning of Te Tirit o Waitangi and its application to our work.</p> <p>We do not collect information relating to disability when recruiting staff and do not hold any data on our current workforce. New staff (and anyone else who has a need) are invited to meet with an external occupational therapist, who can advise us about any workplace infrastructure we need to provide for an employee to work safely.</p> <p>Managers provided with access to training on supporting employees with diverse approaches to work.</p>	<p>Continue to explore the application of te ao Māori views on privacy.</p> <p>Continue to support staff participation in important Māori cultural events on the calendar.</p>
<b>Focus area 6: Te Taunoa o te Mahi Pīngore   Flexible work options</b>	<p>26% of all staff (including managers) have chosen to work part-time and are supported by OPC in that choice.</p> <p>We are working positively with employees who need some accommodation in hours of work for a variety of reasons including to balance whānau care responsibilities, health concerns, and to support for employees with diverse approaches to work. This is also addressing the risk that some may not seek promotion if this has to be traded off for work/life balance. Agreements on flexible work arrangements</p>	<p>Continue to support staff who ask for flexible work options, in accordance with legislation, our policy and general guidance from the Public Service Commission.</p>



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	<p>take into consideration the needs of the Office and the need to ensure fairness in practice.</p> <p>Discussions and decisions on flexible working arrangements are considered only after pay is agreed for new starts.</p>	