



SERIOUS FRAUD OFFICE
TE TARI HARA TĀWARE

Diversity, Equity, and Inclusion Plan

2024

The SFO is committed to Kia Toipoto and Papa Pounamu, ensuring our practices are inclusive, equitable, and encourage diversity. It is important to us that our agency is free from gender and ethnicity-based inequities and that we support accessibility by implementing the Accessibility Charter and Lead Toolkit.

We embrace diversity, equity and inclusion as it is the right thing to do. We endeavor to ensure our people reflect our community, so that we can serve the community well. We mitigate and, where possible, eliminate barriers to achieving equitable outcomes.

Attract

- Compelling employer value proposition referencing diversity, equity and inclusion
- Advertisements and position descriptions that are inclusive and provide clarity
- Relationship focused and nuanced recruitment process
- Gender balanced interview panels
- Transparency about remuneration – offer salary ranges shared with candidates in advertising and in early conversations
- Flexible work practices by default

Engage

- Inclusive leadership, communications, and language
- People centric work practices
- Training that supports and promotes diversity, equity, and inclusion awareness and capability
- Open and robust conversations encouraged
- Transparent career paths and promotion framework
- Learning and development opportunities for everyone
- Recognise and celebrate our people and community

Retain

- Flexible work practices supported
- Pay gaps and inequities monitored and addressed
- Transparent performance and promotion readiness conversations
- Supportive and inclusive culture
- Authenticity embraced
- Sense of belonging

This Diversity, Equity, and Inclusion Plan outlines our commitments and continues to build on our achievements. Future proofing our capability by investing in our people and infrastructure is one of our strategic priorities. To support our success, we are committed to a low gender pay gap and understanding and addressing any ethnic pay gaps, and we aspire to eliminate any pay gaps as we seek to build a diverse workforce.

We are committed to having a workplace that is inclusive, and where people know that they belong. Our focus is aligned with the Papa Pounamu's five priority areas:

Te Urupare i te Mariu | Addressing Bias

Addressing bias in all its forms – policies, practices, systems and remuneration are designed to eliminate bias and/or discrimination.

Te Āheinga ā-Ahurea | Cultural Competence

Building our cultural competence and confidence - all employees learn about and demonstrate cultural competence.

Hautūtanga Ngākau Tuwhera | Inclusive Leadership

Commitment to inclusive leadership development.

Ngā Tūhononga e Kōkiritia Ana e Ngā Kaimahi | Employee Led Networks

Our people feel included, valued, can be themselves and have a sense of belonging at work. Sector-wide employee led networks activities and information shared on our intranet.

Hautūtanga Kākano Rau | Fostering Diverse Leadership

We strive to have our workforce reflect our community. Our workplace accommodates the diverse needs of our people, including accessibility needs and flexible work practices. Our employees have access to learning and development and career advancement opportunities.



SFO Profile

We have had significant organisation growth since July 2020, with our workforce increasing by 50% in the ensuing period. In October 2023 we aligned our business units to three new tier two Deputy Chief Executive leadership roles.

The skills and expertise of our people are highly sought after across the public and private sectors. We operate in a very competitive market for the specialist expertise that our roles require. Our ability to attract and retain talent is often exacerbated by our inability to pay the midpoint or higher market salaries that can be achieved in the private sector. Regardless, implementing and embedding strategies that attract a diverse range of candidates will continue to be a focus for us, and we will pay them fairly.

Our recruitment processes are inclusive and accessible and are nuanced to support neurodiversity and accessibility. A limitation and a challenge for us is the lack of diversity in the small pool of qualified candidates for our roles. Ordinarily we recruit at entry level and increasing diversity in recruits will ultimately positively impact diversity in our leadership roles because, when a senior vacancy occurs, we firstly consider and offer promotion opportunities to our employees.

As a small agency, any change in our employee composition has a significant impact on our gender and/or ethnic pay gap. Any recruit, resignation or employee movement will see gaps fluctuate.

Our people strategy, action plans, and value proposition are promoted in our interaction with candidates, and we speak to and demonstrate our inclusive culture and work environment. We encourage our people to celebrate diversity, in all its forms, through culture building initiatives that include sharing career and life stories, special interests, and our cultures and their celebrations.

The data in this document reflects the recruitment activity, and gender and ethnicity composition of the Serious Fraud Office for the period 1 July 2023 to 30 June 2024.

Our Workforce Profile

Using our workforce data and recruitment statistics, analysis is undertaken quarterly to understand the drivers of any pay gap and to highlight our diversity profile. This allows us to measure progress and make informed decisions in our recruitment, remuneration, and promotion processes.

Recently we have increased female representation in senior leadership roles, achieving gender balance at Executive level (including our CE), two female/two male. At Senior Leadership Team level, we have one female/three male plus one female Principal is in an acting SLT level role. Females are over-represented in lower salary bands, and we are mindful of this when considering recruits and promotions. Our CE is female and is not included in the data below.

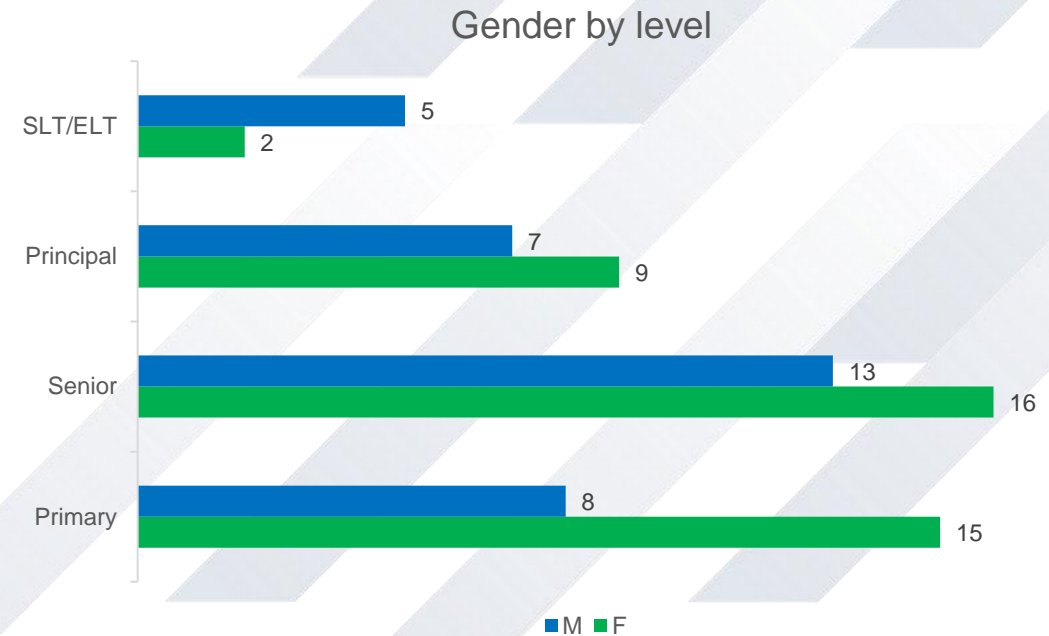
Gender

By 30 June 2024, our gender balance was 56% female and 44% male. At Principal, and Senior and Executive Leadership Team, our leadership roles, we have a 36% female representation.

In the year 1 July 2023 to 30 June 2024, 45% of recruits were female. With a total of 13 recruits and promotions, five females attained senior and leadership level roles.

Of five non-leadership roles recruited, three recruits were female.

The difference between the number of females and males in our Primary level three lower salary bands is material but is closing.



Ethnicity

In the year 1 July 2023 to 30 June 2024, 18% of new recruits (excluding internal promotions) are of ethnicities other than European, and 9% of these people are female.

Our workforce is predominantly European, with 30.7% representing other ethnicities (this includes 10.7% who identify as New Zealander). The total of non-European ethnicities represent fewer than 24 people in each ethnicity at organisation levels. We have presented data as European, and as Other Ethnicities combined, to maintain privacy of individuals. The graph shows the distribution of ethnicities across our workforce and excludes our Chief Executive as we do not collect or hold ethnicity data for non-employees.

The New Zealand population lacks diversity in qualified candidates for our niche roles and this impacts our opportunity to diversify our workforce. When opportunity arises to increase our ethnic diversity, within a merit-based recruitment policy, it is factored in our resourcing decisions.

Pay gaps

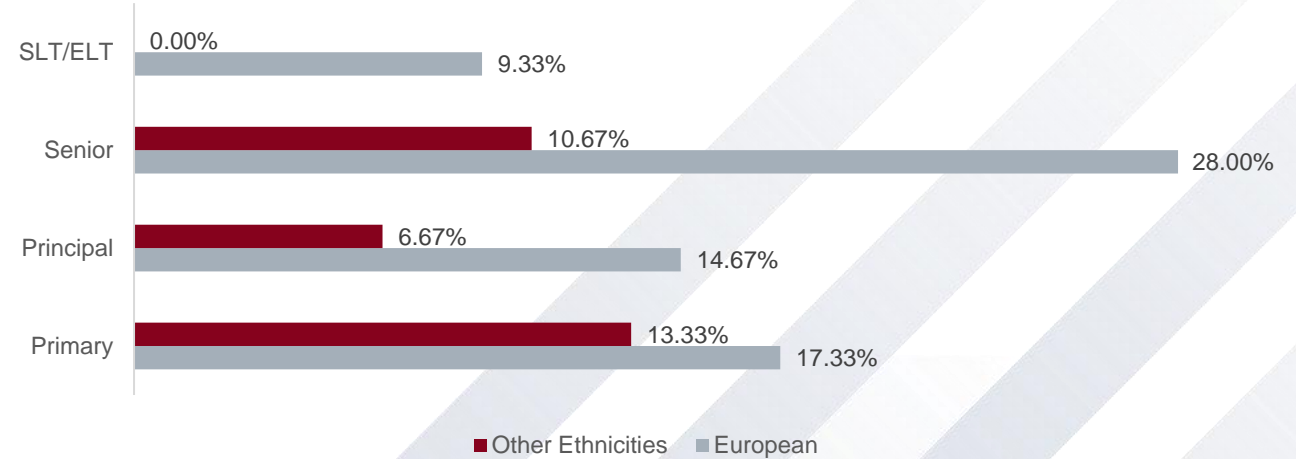
The SFO is proud our gender pay gap has been trending down since reporting commenced in 2019. By 30 June 2024, our average (mean) gender pay gap was 6.8% (median pay gap is 2.9%) compared to June 2019 when our average pay gap was 11.8% (9.6% median). While a small pay gap remains, it is representative of more females than males performing roles in lower pay bands and more males than females in leadership level roles. Our total workforce has more females than males and promotions are seeing females attain senior level roles.

A gender pay gap is evident, in favour of males, in our three lower salary bands however not in like-for-like roles, and we ensure that inequities do not occur in these roles. We analyse and report our gender pay gap quarterly, enabling us to address any pay gaps as they arise.

The closing of our gender pay gap reflects our practice of making salary adjustments if an inequity materialises. We consider internal relativities when making offers of employment, ensuring starting salaries are the same or similar for like for like roles (nuanced only based on experience level), and ensuring our promotion frameworks do not disadvantage based on gender or ethnicity.

With a data group of less than 24 for 'Other Ethnicities', we are unable to report on 'Average Pay by Gender and Ethnicity' or 'Average Pay Gap by Ethnicity' as confidentiality of identifying information cannot be assured. Although we do not publicly report individual ethnicity pay gaps, we monitor and analyse them to ensure that there are no ethnicity-based inequities. This is supported by robust and compliant recruitment and remuneration policies and practices.

Ethnicity by Level



Progress and Action Plan

Objective	Our focus	Progress and Action Plan
<p>Eliminate Bias and Discrimination</p>	<p>Our remuneration and HR systems, people policies and practices are designed to eliminate bias and/or discrimination and remove or mitigate barriers. Impact is measured and any evident bias is challenged.</p> <p>We offer opportunities to learn about and then demonstrate cultural competence.</p>	<p>Our policies and practices continue to be reviewed to ensure they are gender neutral and encourage diversity. Our recruitment practices have been developed to eliminate bias and any evident bias is challenged. This will remain our practice.</p> <p>Inclusive and accessible recruitment practices are in place, including diversity in recruitment panels, and processes and communication nuanced to support neurodiversity. We will continue to review and update our recruitment processes to address the needs of our candidate community.</p> <p>Our Ngā Kaiwhakatore team deliver initiatives to increase our cultural competence. This includes te reo coaching and cultural celebrations. The group remain committed to solidifying the Whāinga Amorangi framework.</p> <p>In our June 2024 engagement survey, the statement <i>'The senior leadership team treat people the way they expect us to treat others'</i> achieved the 82nd percentile approval rating, and the statement <i>'I enjoy working for the SFO'</i> achieved the 85th percentile approval rating, evidencing a culture committed to eliminating bias and discrimination.</p>
<p>Leadership and Representation</p>	<p>We strive to have our workforce reflect our community.</p> <p>Our workplace accommodates the diverse needs of our people, including accessibility needs.</p>	<p>The SFO has 56% female representation. We have gender balance in our Executive roles and two of five of our Senior Leadership Team are female (including a Principal in an acting SLT level role). In our Principal and Senior level cohort 33% are female.</p> <p>With a total workforce of 75 people, ethnicities are represented as 69% European and 31% Other Ethnicities, with 22% Other Ethnicities in our leadership levels (ELT, SLT, Principal).</p> <p>We continue to ensure that attaining diversity in our workforce is considered within our merit-based recruitment policies and practices and, when possible, our decisions reflect the New Zealand population composition.</p> <p>Our promotion frameworks continue to result in an increase in female representation in senior and leadership level roles.</p> <p>Continues...</p>

Progress and Action Plan continued...

Objective	Our focus	Progress and Action Plan
<p>Leadership and Representation continued</p>		<p>Our commitment to diversity, equity, and inclusion in our value proposition is communicated in our advertising, website, and online channels.</p> <p>We celebrate national, cultural, and community days, and encourage our people to share stories about their career, life, and culture to increase our awareness and cultural competency.</p> <p>Periodically, we survey our people to monitor and address our alignment with their requirements and aspirations for diversity, equity, and inclusion.</p> <p>We have invested in premises, facilities, tools, systems, and technology to support and enable accessibility and modern work practices. We provide spaces within our premises to accommodate cultural and religious practices, parenting commitments, and neurodiversity reasonable adjustments.</p>
<p>Flexible and Inclusive Work Practices</p>	<p>We consider all forms of flexibility for all employees.</p>	<p>Flexible work by default is our norm and we consider all forms of flexible working arrangements.</p> <p>We have 7% of our people with formal flexible working arrangements, of which 3% are male.</p> <p>Most of our employees utilise informal flexibility arrangements that include the opportunity to work from home two days per week and flexible start and finish times to accommodate personal commitments and workday preferences.</p> <p>We will continue to review our Flexible Working Arrangements Policy and consider and introduce flexible working options that meet the needs of our workforce.</p>

Progress and Action Plan continued...

Objective	Our focus	Progress and Action Plan
Equitable Development Opportunities	Employees have access to learning experiences and career development pathways.	<p>Our structured promotion framework for Operations and Counter Fraud teams is embedded. Eligibility is based on experience and readiness to progress to a senior level role and each role has a structured development plan. There are no gender or ethnicity barriers to promotion. We have specialist technical leads who develop and deliver training, guidance, and mentoring to support development and increased expertise.</p> <p>We plan to expand the promotion framework to facilitate promotion from Senior to Principal level roles when a vacancy arises.</p> <p>We have a learning and development framework that prioritises learning initiatives associated with continuing professional development requirements, and bolstering our future capability needs. We support personal and leadership development. All employees are eligible to apply for learning experiences and their submissions are assessed by our Senior Leadership Team and approved based on merit of the application and benefit to the individual and the organisation.</p>
Equitable Pay Outcomes	Our remuneration policy ensures parity for equal skills and experience. Starting salaries are transparent and fair.	<p>Our remuneration policy and remuneration reviews and adjustments reflect current Te Kawa Mataaho Public Service Commission guidance. We review our remuneration policy annually and ensure our practices are aligned and obligations are met.</p> <p>We are transparent about salaries at the commencement of and throughout recruitment. Our starting salaries for same and similar roles ensure relativity with our employees undertaking the same work. This will continue to be our practice.</p> <p>In our June 2024 engagement survey, the statement <i>'Our remuneration structure is appropriate and relative to the public sector market'</i> achieved 68th percentile approval.</p>
Transparency	Our policies and processes are accessible and provide clarity, and we share information willingly.	<p>The SFO has developed and published gender pay gap action plans since 2019, and we now integrate the gender pay gap data within our Diversity, Equity, and Inclusion Plan (this document). Our gender pay gap status and HR metrics are measured, analysed, and reported to ELT quarterly. We will continue to develop annual plans aligned with public sector and best practice guidance and reflect engagement with our workforce.</p> <p>All policies, including our remuneration and recruitment policies, are published on our intranet. Salary ranges up to Band 8 - Principal are published. SLT and ELT salary ranges for tier two and three roles are not published due to the low numbers of people within these bands. Salary ranges for ELT and SLT roles are shared with candidates when recruiting or appointing in an acting capacity and relativities are considered.</p>