

# Kia Toipoto and Gender Pay Gap Action Plan 2022

## The SFO Profile

The SFO is a small agency, employing 75 employees (including fixed term) as at 30 September 2022. We are committed to the Gender Pay and Kia Toipoto Principles and ensuring our agency is free from gender and ethnicity-based inequities and eliminating any pay gaps where possible.

Any change in our staffing has a significant impact on our gender and/or ethnic pay gap. Any recruit, resignation or employee movement will see this fluctuate.

We have undergone significant organisational growth since July 2020 with our workforce increasing by 50%.

- As at 30 September 2022 our headcount is 75 with 59% female
- 61% of new recruits have been female, shifting the overall gender makeup considerably
- 57% of new recruits have been into support or primary/entry level roles, with 61.5% of these being female
- 30% of new recruits have been of ethnicities other than NZ European, and of which 57% are female

### Our Workforce Profile – June 2022

We are  
**58.6% Female**  
**41.3% Male**

Our Leadership/Management roles are  
**25% Female**  
**75% Male**  
 (Excluding our CE)

Our organizational pay gap is  
**8.7% (median)**  
**12.3% (mean)**

Our average age is **43**

Our ethnic profile is  
**77% European**  
**15% Asian**  
**8% Other**

## Workforce Analysis

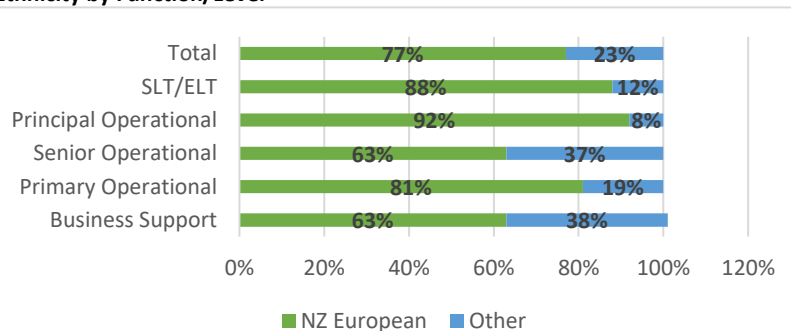
Using our workforce data and recruitment statistics, analysis is undertaken quarterly to understand the drivers of any pay gap and give us an overall picture of our diversity profile, allowing us to measure progress and make appropriate decisions via our recruitment, remuneration and promotion processes.

Over the last 12 months we have recruited 23 new employees. Seven of these new recruits (30%) are non-NZ European. Five out of the seven (71%) were recruited into business support or primary/entry level operational roles.

Implementing and embedding strategies that attract a diverse range of candidates is a focus in 2022/23. Our recruitment processes are inclusive and accessible however we aim to increase non-New Zealand European ethnicity representation across all levels of the organisation and female representation in leadership. Males are under-represented in lower pay bands, and we intend to address this in our recruitment strategy. All candidates are invited to bring a person to their interviews to support their wellbeing and to assist them with potential barriers to success however competency in English is required to adequately perform our roles.

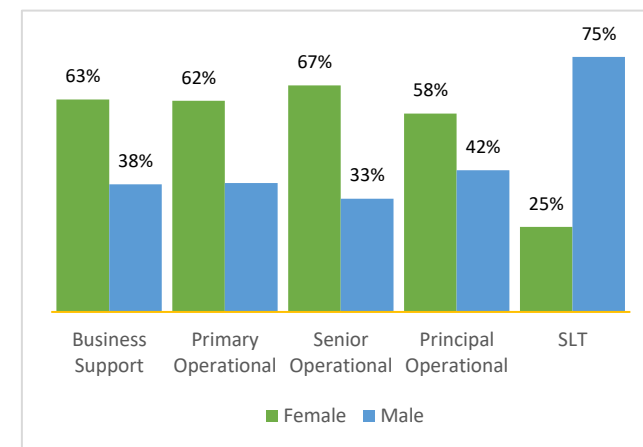
A limitation, and a challenge, for us is the lack of diversity in the small pool of qualified candidates for our highly specialised roles, a systemic issue originating in education or prior employment. Ordinarily we recruit at entry level and when a senior vacancy occurs, we offer promotion opportunities internally. Increasing diversity in recruits will ultimately positively impact diversity in our leadership roles. 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 are actively planning a calendar of inclusion initiatives that celebrate diversity.

### Ethnicity by Function/Level



### Gender by Occupation

The main driver of our gender pay gap is occupation type and not among people performing the same roles, i.e. 'like-for-like'. We have more females performing roles that sit within lower pay bands, specifically involving admin/clerical work or operational roles at entry or primary level.



**Kia Toipoto Objectives**  
(closing gender, Māori, Pacifica and ethnic pay gaps)

**Eliminate Bias and Discrimination**

- Our people policies and practices are designed to eliminate bias and discrimination and remove or mitigate barriers

**Proportional Representation**

- We strive to have our workforce reflect our community

**Flexible Work Practices**

- We consider all forms of flexibility for all employees

**Equitable Development Opportunities**

- All employees have access to learning experiences and career advancement

**Equitable Pay**

- Our remuneration policy ensures pay parity for equal skills and experience

**Te Pono - Transparency**

- Our policies and processes are accessible and provide clarity, and we share information willingly

**Papa Pounamu Objectives**  
(Building cultural competency)

**Address Bias**

- Our people practices are bias free, and any evident bias is challenged

**Cultural Capability**

- We measure our capability and provide learning opportunities

**Inclusiveness**

- Participation is available and accessible for everyone. All voices are listened to and valued.

**Optimise Relationships**

- We strengthen relationships through sharing, listening, and learning

**Acknowledgement and Understanding**

- We acknowledge and celebrate the things that are important to our people, and through sharing our stories we gain greater understanding

**SFO Kia Toipoto and Gender Pay Gap Action Plan 2022**

| Objective  | Our focus   | Our actions and plan   |
|--|---|--|
| <p><b>Eliminate Bias and Discrimination</b><br/>By end of 2023, agencies embed and monitor the impact of bias-free HR and remuneration policies and practices.</p> <p>Agencies ensure leaders and employees learn about and demonstrate cultural competence.</p> | <p>Our remuneration and HR systems, people policies and practices are designed to eliminate bias and discrimination and remove or mitigate barriers and impact is measured. Any evident bias is challenged.</p> <p>All employees learn about and demonstrate cultural competence.</p> | <p>Our policies and practices have been reviewed to ensure they are gender neutral and encourage diversity. Recruitment guidelines have been developed to eliminate bias and any evident bias is challenged. Ongoing review will continue to ensure this remains our current state.</p> <p>Inclusive and accessible recruitment practices are in place, including diversity in recruitment panels. Unconscious Bias, te reo Māori and Treaty of Waitangi training has been delivered to everyone. This will continue to be offered as part of our induction programme within the first six months of employment.</p> <p>Training opportunities will continue to be sourced for ongoing development and improvement in our cultural competency.</p> |

| Objective  | Our focus  | Our actions and plan  |
|--|--|---|
| <p><b>Leadership and Representation</b><br/>By end of 2022, agencies have plans and targets to improve gender and ethnic representation in their workforce and leadership. By end of 2024 be substantially more representative of society.</p> | <p>We strive to have our workforce reflect our community.</p>  | <p>Currently we have a higher female representation across our business. New recruits in the last 12 months are 65% female. However, we currently only sit at 25% female representation and 12% non-NZ European across SLT and ELT. We are a small agency, and this can be difficult to plan to change, however we would like to increase diversity and have a more balanced gender representation in leadership within the next five years. This will also be demonstrated in providing opportunities to act in senior positions wherever possible.</p> <p>We recognise that we have more females performing roles that sit in lower pay bands, i.e. support, entry or primary level operational roles. We also recognise that our organisation profile is 77% NZ European/New Zealander. Our recruitment practices will continue to focus on attracting diversity in applicants, with the importance of diversity, equity, and inclusion in our work communicated in our advertising.</p> <p>We will ensure that our website and online channels reflect the work that we do and our value proposition for diversity, equity, and inclusion.</p> <p>We will run a Diversity and Inclusion survey annually and create an action plan to ensure that the work we are doing remains current and relevant to our workforce. This includes identifying national, cultural and community days and events that are important to our people and planning appropriate ways to celebrate together.</p> <p>We will implement the Accessibility Lead Toolkit relating to employing disabled people.</p> |
| <p><b>Flexible Work Practices</b><br/>By 2024 agencies offer equitable access to flexible-by-default working to everyone and ensure it does not undermine progression or pay.</p>  | <p>We consider all forms of flexibility for all employees.</p>   | <p>Our Flexible Working Arrangements Policy and Guidelines were implemented in November 2020 and enable people to access flexible-by-default working. The Guidelines support and guide managers through the decision making and administration of the policy processes.</p> <p>We will continue to monitor this policy to ensure that it meets the needs of the time.</p> <p>We will use Hybrid Working Guidance to support hybrid working.</p>   |
| <p><b>Equitable Development Opportunities</b><br/>By mid 2023 have career pathways and equitable progression opportunities that support women, Māori, Pacific and ethnic employees to achieve their career aspirations.</p>                    | <p>All employees have access to learning experiences and career advancement.</p>   | <p>We have developed and implemented a 'promotion readiness assessment process' which is available to all employees who wish to progress to more senior roles in our investigations and counter fraud teams. This process forms part of an individual development plan to ensure that development is appropriately structured around the specific requirements of the role and the individual. This process will be developed to support other departments where a pathway can be established.</p>  |
| <p><b>Equitable Pay Outcomes</b><br/>By end 2022 salaries are not influenced by bias. Agencies monitor salaries to ensure gender pay and ethnic pay gaps to not</p>  | <p>Our remuneration policy ensures pay parity for equal skills and experience. Starting salaries are transparent and fair.</p> | <p>Our remuneration policy is reviewed annually to ensure our salaries are keeping pace with the market and reflect PSC Guidance or pay restraint obligations.</p> <p>Our annual remuneration review identifies pay gap anomalies that may have arisen, and</p>   |

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| reopen.  |  | <p>these are remedied.</p> <p>We will continue to monitor starting salaries for same and similar roles for relativity with current SFO employees undertaking the same work and address any impact on our gender pay gap.</p> <p>Recruitment practices to remain inclusive and encourage diversity in candidates to reduce the impact of occupational segregation.</p>  |
| <p><b>Te Pono – Transparency</b></p> <p>Agencies to publish annual action plans based on gender and ethnicity data and union/employee feedback.</p> <p>Agencies to ensure easy access to HR and remuneration policies, including salary bands.</p> | <p>Our policies and processes are accessible and provide clarity, and we share information willingly</p> | <p>The SFO has developed, and published gender pay gap action plans since 2019. Our annual engagement and other workforce surveys, and consultation with groups across our workforce, inform our plan. We will continue to develop plans annually, following relevant guidance and engagement with our workforce.</p> <p>Our remuneration policy is reviewed and published annually. Salary ranges up to Band 8 are published. SLT and ELT salary ranges for tier two and three roles are not published due to low numbers of people within these bands, but the range data is used when recruiting or appointing in an acting capacity.</p> <p>Our gender pay gap status and progress are measured and reported to SLT quarterly and published on our intranet.</p> |