

# Guidance for public service agencies: Developing DEI plans

June 2024



**Te Kāwanatanga o Aotearoa**  
New Zealand Government

*Note:* to make this document more accessible, links to all relevant resources are in Appendix 2.

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# 1. Purpose of this Guidance

This guidance supports agencies to develop Diversity Equity and Inclusion (DEI) plans that meet the reporting requirements of Papa Pounamu and Kia Toipoto in a single integrated plan, reflecting the shared outcomes and strong connections between them. Publishing annual plans also drives progress and provides accountability for agency and system DEI commitments and goals.

This guidance responds to requests by agencies for the Public Service Commission to simplify and reduce agency reporting on DEI. In 2023, as a first step, we invited you to combine your Papa Pounamu Diversity and Inclusion (D&I) and Kia Toipoto plans. Going forward, creating a more integrated plan is intended to be even easier and more efficient. Agencies can still choose to develop and publish separate plans (and reference Papa Pounamu priority areas and Kia Toipoto drivers) if they choose to.

## 2. Diversity Equity and Inclusion: Integrating Papa Pounamu and Kia Toipoto

Together Papa Pounamu and Kia Toipoto set out a comprehensive DEI programme that supports your agency to:

- increase diversity at all levels, to reflect and deliver for the communities we serve
- 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, including for disabled people and members of Rainbow communities
- strengthen inclusion so that everyone feels respected, valued and able to achieve their potential.

There is more detail on how Papa Pounamu and Kia Toipoto relate to DEI, and to agencies' statutory obligations in Appendix 1.

Many groups experience discrimination, inequities, bias, pay gaps and exclusion. Pacific women have the lowest average pay in the Public Service. Disabled public servants and members of Rainbow communities report lower inclusion than non-disabled and non-Rainbow.

Public Service Workforce Data shows progress for women and Māori in representation in leadership and narrowing pay gaps. This shows it is possible to make significant gains with targeted, comprehensive and coordinated actions. We now need to make similar gains for Pacific, ethnic, disabled and Rainbow communities while maintaining momentum for Māori, and for all wāhine.

Papa Pounamu and Kia Toipoto recognise that many people are members of more than one group, and multiple forms of bias and discrimination compound to result in poorer employment and inclusion outcomes. These intersectional impacts are experienced across gender, ethnicity, disability, Rainbow communities and other identities.

### 3. Using this guidance

Throughout this guidance, the content your plan should include is marked in **blue**.

There are no new requirements. Although, if your agency has not published its D&I plan before, the requirement to publish your integrated plan (or D&I plan, should you choose to keep separate plans) is new.

#### Where the different elements of Papa Pounamu and Kia Toipoto fit under DEI

We've suggested where the elements of Papa Pounamu and Kia Toipoto will correspond most closely to diversity, equity and inclusion. You can choose where in your plans to include the different elements. For example, your work on 'Effective career and leadership development' could easily sit under diversity or equity.

#### How much detail to include

There is flexibility about the amount of detail in your plan, while providing a comprehensive picture of your DEI progress and plans. Agencies' plans should reflect the size and the complexity of their workforces.

You may wish to refer to related work, such as Whāinga Amorangi, or recognition and awards.

#### It's important to include requested information

Your DEI plans are a key source of information for the Public Service Commission to understand progress and report to stakeholders including Ministers. Therefore, please cover every section marked in blue, or note why you are unable to. For example, there may be data constraints, especially for small agencies.

Your published plan(s) support the high-level data and information you provide in your annual reports. From 2024, you will be asked for a link to your published DEI plan (OR to your published Kia Toipoto and D&I plans) in your annual reports.

#### Reflect your greatest challenges and include as many groups as possible

Throughout your plan, include how you will improve workplace outcomes for those most affected by inequity, bias and discrimination in your agency, noting that across the Public Service:

- Pacific women have the lowest average pay of any ethnic gender combination
- disabled public servants and members of Rainbow communities reported lower inclusion than non-disabled and non-Rainbow public servants in Te Tauanki (the Public Service Census) 2021
- Pacific, Asian and MELAA public servants have the lowest proportional representation in leadership

and that across agencies there are gaps in:

- career progression initiatives for members of ethnic communities
- wider cultural competence initiatives.

Where there are small numbers of employees in different groups, use qualitative information and aggregated data to talk about challenges and solutions.

## Including disabled people and members of Rainbow communities

You may not have data on your disabled employees and members of Rainbow communities. Progress can still be made. In each section of your plan include your progress and plans to improve DEI for these groups, and include any related data you have.

### For support

For queries or support please contact [DEIPlans@publicservice.govt.nz](mailto:DEIPlans@publicservice.govt.nz).

## 4. Publishing your plan

1. Publish your DEI plan on your agency website and your intranet by 15 November 2024.

OR

Publish your Kia Toipoto plan AND your D&I plan on your agency website and your intranet by 15 November 2024.

2. Send a link(s) to your published plan(s) to [DEIPlans@publicservice.govt.nz](mailto:DEIPlans@publicservice.govt.nz).

**Note:** Public Service agencies have signed up to the Accessibility Charter which requires all information intended for the public to be accessible.<sup>1</sup>

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<sup>1</sup> For more information, see <https://www.msd.govt.nz/about-msd-and-our-work/work-programmes/accessibility/accessibility-guide/index.html>. As a starting point, agencies should provide all base information in Word, in Plain Language, and follow Clear Print Guidelines, see <https://www.msd.govt.nz/about-msd-and-our-work/work-programmes/accessibility/quick-reference-guides/checklist-for-plain-language.html>

## 5. Contents of your plan

### Ngā kōrero o roto | Content overview

This is the main content that DEI plans should include:

- organisation overview, context and commitment. What DEI means for how you deliver for New Zealanders
- data - representation, pay gaps and average pay, with trends over time
- narrative - what your data and employee and union feedback and input are telling you about progress, challenges and priorities
- progress to date and planned actions in DEI.

### Tā te whakahaere matawhānui, manawanui hoki | Organisation overview, context and commitment

This section could include:

- your vision for DEI outcomes and connections with your kaupapa or the communities you serve
- your commitment to implementing and maintaining Papa Pounamu and Kia Toipoto
- your organisation's context and workforce, relevant to DEI
- a broad overview of your key DEI progress to date and priorities
- connections between your DEI programme and delivering services which meet the needs of all New Zealanders.

**Include in your plan** the stakeholders you engaged with to develop your plan (including unions, women, Māori, Pacific and ethnic employees and tāngata whaikaha Māori, disabled people, and members of Rainbow communities). Note the Kia Toipoto commitment to Māori: Māori participate in action and monitoring.

### Te raraunga | Data

For those agencies that submit payroll data to the Public Service Commission as part of the Workforce Data collection, the majority of gender and ethnicity metrics (on representation, pay gaps, and average salaries) will be available in the 'sense check' document that is produced as part of your agency's submission.

From June 2024, the Public Service Commission is adding an extra sheet into the 'sense check' to provide these figures already calculated and made confidential, ready for inclusion in DEI reporting, annual reports or other public documents.

We encourage you to use these figures. This both reduces the load on your agency and ensures that reporting on these metrics is consistent across the Public Service.

For a full list of figures to be included within the 'sense check', please see Appendix 2.

Some figures may not be included in the 'sense check' because of confidentiality rules. This indicates that they should not be included in your reporting either.

For agencies who do not submit payroll data, or those who wish to include other variables or breakdowns not included on the list in Appendix 2, please see the following guidance:

- Organisational gender pay gaps: Measurement and analysis guidelines
- Guidance: Collecting, measuring and reporting pay, pay gaps, and representation

Note also the Kia Toipoto commitment to Māori: include data and actions to achieve equitable outcomes for Māori.

### Representation data

**Include in your plan** the proportion of women, Māori and tāngata whaikaha Māori, Pacific, ethnic and disabled employees and members of Rainbow communities in your workforce and leadership, to the extent that you have the data.

Te Taunaki 2021 results for your agency may provide data on religion, languages and indicative mental health. If you refer to this data, note that it is indicative. Many responses will have changed, especially in small agencies.

### Pay and pay gaps

**Include in your plan**, if you have at least 20 people in each comparison group:

- mean and median, agency-wide, gender, Māori, Pacific and ethnic pay gaps and for disabled people and members of Rainbow communities to the extent that you have the data
- other and more detailed pay gaps if possible, and where they are relevant to your analysis and narrative, e.g. by leadership level, within roles or occupational groups.

### Average salary by gender and ethnicity

**Include in your plan** for each group with at least 20 employees, the average pay of each ethnic/gender group in a graph, such as this one published annually by the Public Service Commission:

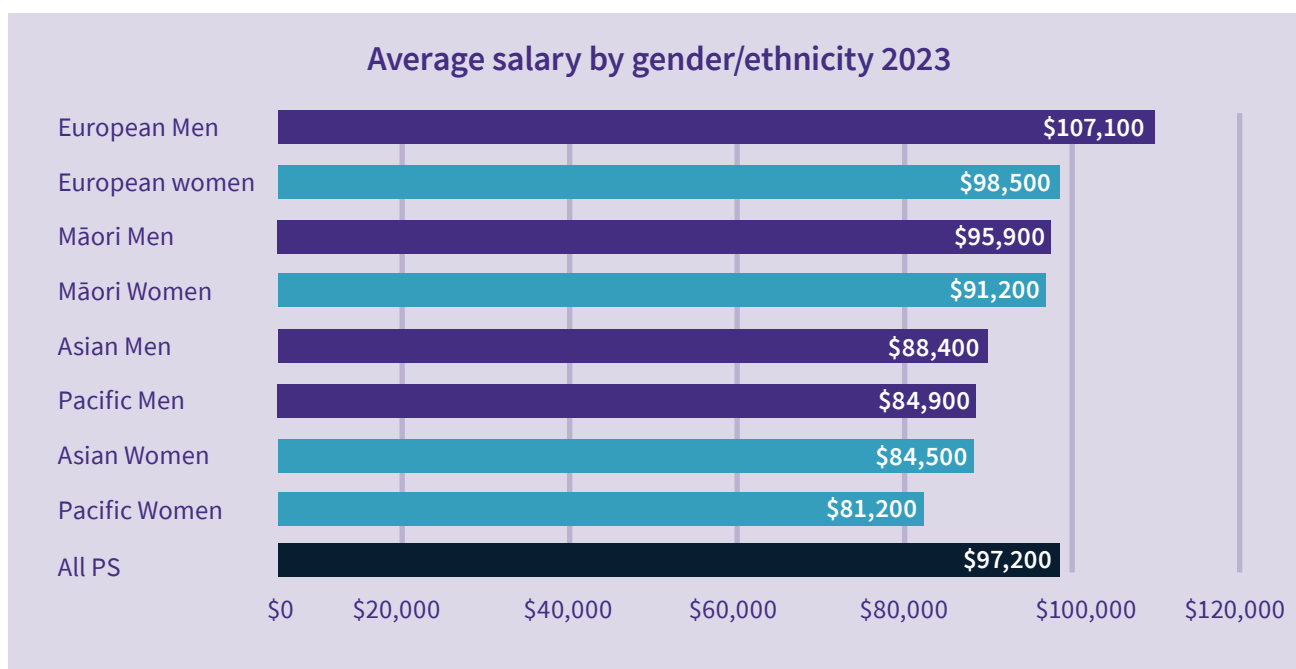


Figure 1: Table of average pay by gender and ethnicity

You can include other groups to the extent that you have the data. For groups of fewer than 20 employees consider including aggregated pay information, e.g. European/non-European pay gaps and average pay by gender.

#### Also include:

- data definitions e.g. for employee, leader, pay
- the total number of employees in your organisation
- the date on which you measured your data
- the disclosure rate (ie the proportion of employees who shared) for different data sets.

### Te roanga o te kōrero | Narrative

**Include in your plan** a narrative that connects your data, analysis, overall progress and future priorities.

#### Include:

- differences in pay gaps, representation, occupations, and experiences of inclusion, for different groups. Include relevant insights from data you may have reviewed but not published, and intersectional analyses where possible
- trends over time
- qualitative information, feedback or input you have from unions and employees.
- your analysis of what is driving your pay gaps, any under-representation in your workforce and leadership, inequities or experiences of exclusion
- the links between your analyses and your priorities and planned actions.

### Pae tata, pae tawhiti | Progress to date and future plans

**Diversity.** Representation in workforce, leadership, and occupations, especially for under-represented groups.

These elements of Kia Toipoto and Papa Pounamu are especially relevant to increasing diversity:

- Fostering diverse leadership
- Employee-led networks
- Cultural competence
- Workforce and leadership representation
- Eliminating bias and discrimination from recruitment policies and practices
- Effective career and leadership development
- Māori are influential at all levels of the workplace
- Māori have career paths that empower them to achieve their career aspirations
- Flexible work by default.

### Include in your plan:

A summary of your plan to improve gender and ethnic representation, and any under-representation including for disabled and Rainbow communities in your workforce (if the size of your workforce allows), and a link to this plan. Your representation plan should include:

- targets associated with your main representation challenge(s)
- progress to date and plans to address barriers in recruitment and career progression to support your representation targets
- progress to date and plans to address barriers, and provide support for, emerging leaders.

**Also include in your plan:** progress to date and plans to embed and maintain flexible work by default.

**Equity.** Pay gaps and average pay for different groups, equitable pay (starting salaries and pay in the same or similar roles).

These elements of Kia Toipoto are especially relevant to closing pay gaps and achieve equitable pay outcomes:

- Equitable pay outcomes
- Agencies work purposefully and with good intentions to achieve equitable pay for Māori
- Eliminating bias and discrimination from remuneration policies and practices.

**Note:** many agencies are working on pay equity claims but you do not have to include this in your plan.

**Include in your plan** progress to date and plans to:

- ensure that starting salaries and salaries for the same or similar roles are not influenced by bias
- monitor starting salaries and salaries for the same or similar roles to ensure gender and ethnic pay gaps do not reopen
- identify and address bias in remuneration policies and practices.

**Inclusion.** The extent to which all employees feel respected and valued and able to achieve their potential.

These elements of Kia Toipoto and Papa Pounamu are especially relevant to strengthening inclusion:

- Cultural competence
- Employee-led networks
- Addressing bias
- Inclusive leadership
- Māori participation in action and monitoring
- Agencies enhance workplace practices and the mana of Māori and others
- Agencies celebrate tikanga, kawa and matāuranga Māori, and taonga such as te reo Māori.



**Include in your plan** progress to date and plans to:

- build a positive working environment
- strengthen cultural competence
- encourage and support employee-led networks
- address bias and discrimination.

**Also include** a list of employee-led networks in your agency and who they represent.

### Note on measuring inclusion

Measuring progress on inclusion requires consistent use of the same indicator over time. Some possible indicators are influenced by factors beyond inclusion. For example, retention can also reflect labour market conditions, and engagement surveys can reflect the wider context, such as a restructuring.

Staff surveys using the same questions over time are the most effective way to measure inclusion, provided respondents feel safe to express their true feelings and experiences. Anonymous surveys that report for large groups/agencies rather than teams/managers are more likely to yield accurate results.

The Public Service Census (Te Taunaki) uses this methodology and is the best measure of inclusion in agencies. We will advise agencies of the timing for the next Te Taunaki when it is confirmed.

In the meantime, we recommend agencies build a picture of progress on inclusion using the information they have. Agencies should consider:

- the views and experiences of employees, eg feedback from staff focus groups
- differences in indicators of inclusion for different groups, eg feedback from employee-led networks
- information on complaints, bullying and harassment (but you do not need to publish this).

## 6. Format

We recommend a table format for reporting progress to date and planned actions. Figure 2 (below) is an example of how this could look. To ensure your table is as accessible as possible, do not use bullets or merge cells.

### Equity

Action area	Progress to date	Planned priority actions 2025	Success indicators
Starting salaries	Introduced starting salaries calculator in 2021	We will update the starting salaries calculator to include ethnic groups	No gaps in starting salaries for similarly skilled and experienced employees in the same or similar roles
	Salary for the role has been included in job ads since 2022		No gaps between groups in average position in range for starting salaries
	Gender gaps in starting salaries have fallen each year since 2021	BAU: We monitor position in range (PIR) by gender and ethnicity in our regular quarterly data review.	There is no significant unexplained difference in the average starting PIR by gender or ethnicity.

Figure 2: Table of progress to date and planned action

## Appendix 1: How Papa Pounamu and Kia Toipoto relate to statutory obligations and to DEI

Papa Pounamu and Kia Toipoto help agencies meet the requirements of the Public Service Act 2020 (especially sections 73 and 75), the Human Rights Act 1993, the Equal Pay Act 1972. They also help agencies to work with Māori, and to achieve equitable outcomes for Māori, as intended by Te Tiriti o Waitangi.

The different elements of Papa Pounamu and Kia Toipoto relate to and reinforce each other, and together set out a comprehensive DEI programme.

Transparency and employee and union engagement underpin DEI.

Diversity, equity and inclusion are interconnected, and the different elements of Kia Toipoto and Papa Pounamu often contribute to more than one aspect of DEI. For example, fostering diverse leadership has a clear relationship to diversity. It is also important to equity, since it helps to close pay gaps.

Agencies can choose where in your plans to refer to different elements of Kia Toipoto and Papa Pounamu. Some elements, such as addressing bias or flexible work, might sit apart, rather than under diversity, equity or inclusion, given how widely these apply.

There are many ways to think about the relationships between DEI, Papa Pounamu and Kia Toipoto. The following groupings are one suggestion.

**Diversity.** Representation in workforce, leadership, and occupations, especially for under-represented groups.

These elements of Papa Pounamu and Kia Toipoto are especially relevant to increasing diversity:

- Fostering diverse leadership
- Cultural competence
- Workforce and leadership representation
- Eliminating bias and discrimination from recruitment policies and practices
- Effective career and leadership development
- Māori are influential at all levels of the workplace
- Māori have career paths that empower them to achieve their career aspirations
- Flexible work by default.

**Equity.** Pay gaps and average pay for different groups, equitable pay (starting salaries and pay in the same or similar roles).

These elements of Kia Toipoto are especially relevant to closing pay gaps and achieve equitable pay outcomes:

- Equitable pay outcomes
- Eliminating bias and discrimination from remuneration policies and practices
- Agencies work purposefully and with good intentions to achieve equitable pay for Māori.

***Inclusion.*** The extent to which all employees feel respected and valued and able to achieve their potential.

These elements of Papa Pounamu and Kia Toipoto are especially relevant to strengthening inclusion:

- Cultural competence
- Employee-led networks
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- Inclusive leadership
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- Agencies celebrate tikanga, kawa and matāuranga Māori, and taonga such as te reo Māori.

## Appendix 2: Key resources

### General

[Progress in promoting diversity, equity and inclusion across the Public Service in 2023](#)

[Papa Pounamu Public Service work programme](#)

[An introduction to Pay Gaps and Kia Toipoto](#)

[Kia Toipoto – Public Service Pay Gaps Action Plan 2021-24](#)

[Guidance – Kia Toipoto Closing Gender, Māori, Pacific and Ethnic Pay Gaps](#)

[Joint Kia Toipoto and Pou Mātāwaka - Māori, Pacific and ethnic work plan](#)

[Agency and Crown entity Pay gap action plans](#)

[Guidance: Crown Entities' Pay Gaps Action Plan](#)

[Guide: Implementing Kia Toipoto in small organisations](#)

### Data

[Organisational gender pay gaps: Measurement and analysis guidelines](#)

[Guidance: Collecting, measuring and reporting pay, pay gaps and representation in the Public Service](#)

[Workforce Data – Wage trends](#)

[Workforce Data](#)

[Data drilldown](#)

## Figures to be included in 'sense check' document:

### Representation

1. % female
2. % male
3. % another gender
4. % European
5. % Māori
6. % Pacific
7. % Asian
8. % MELAA
9. % disclosed ethnicity

### Pay gaps

10. Mean GPG
11. Median GPG
12. Mean Māori pay gap
13. Mean Pacific pay gap
14. Mean Asian pay gap
15. Mean MELAA pay gap
16. Median Māori pay gap
17. Median Pacific pay gap
18. Median Asian pay gap
19. Median MELAA pay gap

### Average salaries

20. Average salary male European
21. Average salary male Māori
22. Average salary male Pacific
23. Average salary male Asian
24. Average salary male MELAA
25. Average salary female European
26. Average salary female Māori
27. Average salary female Pacific
28. Average salary female Asian
29. Average salary female MELAA

## Diversity

[Guidance: Eliminating all forms of bias and discrimination in recruitment processes](#)

[Guidance: Improving workforce and leadership representation](#)

[Guidance: Career progression, pathways, breaks and leave](#)

[Guidance: Flexible-Work-by-Default](#)

[Lead Toolkit - For employing disabled people](#)

## Equity

[Guidance: Ensuring bias does not influence starting salaries](#)

[Guidance: Ensuring bias does not influence salaries for the same or similar roles](#)

[Guidance: Remuneration](#)

## Inclusion

[Rainbow inclusive language guide](#)

[Inclusive language](#)

[Accessible information and communications](#)

[Employee-Led Networks Maturity Framework](#)

[Employee Led Networks - Te Puna Huihuinga Kaimahi](#)

[The value of Employee-Led Networks](#)

[Positive and safe workplaces model standards](#)

[Positive Workplace Cultures](#)

## Supporting information DEI plans guidance

### Background - why was this guidance developed?

The attached guidance supports Public Service agencies to develop integrated DEI plans. It responds to requests by agencies for the Public Service Commission to simplify and reduce agency reporting on DEI. In 2023, as a first step, we invited you to combine your Kia Toipoto and D&I plans. Creating a more integrated plan is intended to be even easier and more efficient.

This guidance has also been developed to recognise and reflect the shared outcomes and strong connections between Papa Pounamu and Kia Toipoto, and that many agencies approach these initiatives as one interconnected work programme.

This guidance replaces previous guidance: Kia Toipoto Guidance Public Service Agency Pay Gaps Action Plans 2022. It is less detailed, reflecting the increasing maturity of agencies in implementing Kia Toipoto, and because detailed advice is provided in the suite of supporting resources. It also replaces the Guidance: Combining Diversity and Inclusion and Kia Toipoto Plans.

### What this means for agency reporting

Agencies need to:

Publish your DEI plan on your agency website and your intranet by 15 November 2024.

OR

Publish your Kia Toipoto plan AND your D&I plan on your agency website and your intranet by 15 November 2024

From 2024, Treasury guidance on annual reporting will ask for less detail about DEI in your annual report. Instead, it will ask for high-level information and data, and will ask agencies to link to your relevant published plan(s).

### Connection with Joint Kia Toipoto and Pou Mātāwaka Māori, Pacific and ethnic work plan

Work is underway on developing the Joint Kia Toipoto and Pou Mātāwaka Māori, Pacific and ethnic work plan from the [Māori Pacific and Ethnic Pay Gaps Work Plan](#). The joint plan will progressively provide guidance and resources to help strengthen your existing work in these areas, and address any gaps for these groups.



## Connection with the Public Service disability and Rainbow 4 point plans

In 2023, as a result of the deep dive reports from Te Taunaki on disabled people and rainbow communities, a focused approach was developed to improve inclusion and representation for disabled and Rainbow people in the Public Service workforce. The Public Service disability and Rainbow 4 point plans aim to drive change at the system level. They reflect where the greatest impact can be made for disabled people and members of Rainbow communities across the Public Service. Work is well underway on the 4 point plans. The working groups for the plans will progressively provide guidance and resources to help strengthen your existing work in these focus areas, and address any gaps.

Agencies are not required to report on the focus areas of the 4 point plans. Most agencies have some work already underway on diversity, equity and inclusion for disabled employees and members of Rainbow communities. You should continue this, and include work to date and plans to strengthen DEI for disabled people and members of Rainbow communities under diversity, equity and inclusion in your DEI plans.

### Note on disability and Rainbow data

Agencies should follow existing measurement guidance and standards for the Public Service for advice on collecting and measuring disability and Rainbow data. However, under the disability and Rainbow 4 point plans, Stats NZ, the Public Service Commission and stakeholders are developing further guidance to be released later in 2024 or into 2025. Agencies should refrain from any new data collection until guidance is released or contact SIT team (add contact) for advice.

### Support and any queries

Please contact [DEIPlans@publicservice.govt.nz](mailto:DEIPlans@publicservice.govt.nz)

## Q&As

These are the most common questions agencies have asked about developing DEI plans.

**Q: We published a combined plan Kia Toipoto and D&I plan last year and that works for us, can we continue to do this?**

**A:** Yes, you can publish a combined Kia Toipoto and D&I plan instead of an integrated DEI plan.

**Q: Can we continue to publish separate D&I and Kia Toipoto plans?**

**A:** Yes, you can continue to develop and publish separate plans. Noting that these will need to be updated with progress annually.

**Q: Do we have to create a new plan each year or can we publish an update on an existing plan?**

**A:** You do not need to create a new plan or plans each year. You may publish a progress update on your existing plan/s. However, the data in your plan/s needs to be updated annually.

**Q: How do we include the Public Service disability and Rainbow 4 point plans in our reporting and planning?**

**A:** Agencies are not required to report on the focus areas of the 4 point plans at this stage. But if they wish, agencies can include progress to date and plans to strengthen DEI for disabled people and members of Rainbow communities under diversity, equity and inclusion in their plans.

**Q: We have a multi-year strategy, not a plan. How does this align with annual planning and reporting?**

**A:** If you publish a multi-year strategy instead of a plan, you will need to publish annual updates to the strategy providing updated data, progress to date and planned actions.

**Q: The Treasury guidance asks for a link to our published D&I plan in our annual report, but it's not published.**

**A:** Note in your annual report that your D&I plan or your DEI plan will be published by 15 November 2024.

**Q: What if we don't have a D&I plan?**

**A:** You can develop and publish an integrated DEI plan by 15 November 2024, OR you can develop and publish separate D&I and Kia Toipoto plans by 15 November 2024.