FMA
FINANCIAL MARKETS AUTHORITY
TE MANA TĀTAI HOKOHOKO

AUCKLAND OFFICE
Level 5, Ernst & Young Building
2 Takutai Square, Britomart
PO Box 106 672, Auckland 1143
PHONE +64 9 300 0400

19 May 2025

[redacted]

By email: [redacted]

Dear [redacted]

Your request for information – CAS-147583

1. We refer to your email dated 16 April 2025 in which you requested the following information:

   All reports, submissions, aide memoires, briefings, reports, analysis, and sent, held, or received by your organisation in relation to updates to Diversity and Inclusion, or Diversity, Equity, and Inclusion (DEI), or Belonging and Inclusion, regulation policies, plans, and strategies including but not limited to:
   - *The development, implementation, or evaluation of diversity, equity and inclusion policies, strategies, plans, and regulations.*
   - *The Public Service (Repeal of Diversity and Inclusiveness Requirements) Amendment Bill.*
   - *Communications with New Zealand First and other coalition partners concerning Diversity and inclusion policies (or similar policies/regulations) and the proposed repeal.*
   - *Assessments or analysis of the effects of removing DEI or similar regulations from public service legislation.*

   Timeframe: From January 1, 2024, to the date of this request

2. We have considered your request pursuant to the OIA. The FMA holds the following documents within scope:

   2.1. Diversity Quality Assurance report (May 2024)

   2.2. Diversity, Equity and Inclusion (**DEI**) approach report to the FMA's People, Performance and Renumeration Committee (**PPRC**) (28 August 2024)

   2.3. Kia Toipoto Action Plan (August 2024)

   2.4. DEI Approach (September 2024)

   2.5. DEI update report to the FMA's PPRC (15 April 2025)

3. Note, the FMA additionally has a DEI Policy, DEI Guidelines and a DEI page that provides resources for staff. This information is made available to staff on our intranet. The Policy and Guidelines were last

reviewed in 2022 and will be reviewed this year in accordance with the FMA's three yearly policy review cycle and therefore fall outside the scope of your request.

4. The FMA does not hold:

   4.1. Documents relating to the Public Service (Repeal of Diversity and Inclusiveness Requirements) Amendment Bill.

   4.2. Communications with New Zealand First and other coalition partners concerning Diversity and inclusion policies (or similar policies/regulations) and the proposed repeal.

   4.3. Assessments or analysis of the effects of removing DEI or similar regulations from public service legislation.

Our decision under the OIA

5. Copies of the documents referred to at 2.2 to 2.5 are **enclosed**. Note, personal information has been redacted from the documents pursuant to s 9(2)(a), to protect the privacy of natural persons.

6. We have decided to withhold the document referred to at 2.1 (Diversity Quality Assurance Report) under s 9(2)(b), as the Report was prepared for the FMA by a service provider on a confidential basis. This Report is referenced in the DEI Approach and PPRC reports.

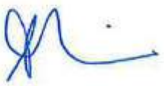
7. Your requests noted at paragraph 4 are refused under s 18(e) (the information requested does not exist or, despite reasonable efforts to locate it, cannot be found).

8. We have not identified any circumstances which render it desirable, in the public interest, to make the information withheld pursuant to ss 9(2)(a) and 9(2)(b) available.

9. You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

10. If you wish to discuss this request with us, please feel free to contact me.

Yours sincerely



Ariarna Hakaraia
Manager, Internal Governance

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FINANCIAL MARKETS AUTHORITY PEOPLE, PERFORMANCE AND REMUNERATION COMMITTEE

Meeting No. 57

Wednesday 28 August 2024

Agenda Item 2: Approach to Diversity, Equity and Inclusion

Performance and Remuneration Committee Paper

4 June 2024

Approach to Diversity, Equity and Inclusion

Purpose
The following update outlines the recommended approach to Diversity, Equity, and Inclusion (DEI) within the FMA for the 24/25 FY, including a high-level indication of workplan and activity.

Recommendation

We recommend that the People, Performance and Remuneration Committee:

(a) **Note** the contents of this paper.
(b) **Provide** recommendations and suggestions to refine and improve the revised approach to DEI at the FMA.

Purpose of DEI
The purpose of DEI at the FMA is to create a workplace where every person feels recognised, valued, and empowered to contribute their unique skills and experience. Regardless of background or identity, individuals can thrive, are supported to grow professionally and personally, and have a sense of belonging within the FMA. Through exposure to diverse perspectives, we have the opportunity to challenge the norm and drive change and innovation.

Current state
In February 2024 new roles and responsibilities for DEI within the FMA were agreed (Ref. DEI Update presented to ELT 28 March 24).

Since then, we have reviewed previous approaches, engaged with the organisation, conducted a self-assessment, and undertaken Qualified Aotearoa Inclusivity Matrix (AIM) Assessment with Diversity Works. This assessment identified the strengths, opportunities, and challenges that we have based our approach on.

It is acknowledged that DEI represents a continuous journey without a defined conclusion. Our path forward will be informed by the data we gather, feedback received, and interactions from within the organisation. We now have dedicated resource within the Culture and Engagement team to implement the DEI approach ensuring its ongoing relevance, effectiveness, and coherence.

Proposed approach
The recommendation for the next 12-months is to build a comprehensive foundation of DEI components to increase acceptance, build capability and develop responsibilities within the FMA. This approach aims to evolve the current awareness generated from internal events and dive deeper to support behaviour change. This approach will leverage the strengths of our organisation –

particularly the openness of our people and their desire to learn – and aligns with Papa Pounamu expectations.

The AIM framework refers to seven components, leadership, diversity infrastructure, diverse recruitment, inclusive career development, Te Tiriti responsiveness, inclusive collaboration, and social impact which will reflected in our FMA DEI framework. Recognising that tangata whenua (and therefore Te Tiriti responsiveness component) is distinct from 'diversity,' it will be addressed separately and more directly through Matangirua. Our DEI approach will align to this and support cultural competency through Matangirua. The following components of the FMA DEI framework provide a comprehensive foundation for us to build on and advance our DEI approach in a manner appropriately tailored to our organisation.

Leadership: The support, action and direction provided through the organisation from senior leadership is proven to be a determining factor for making real impact and leading necessary behaviour change. This includes driving thought leadership, accountability, visibility, and consistency throughout different levels of the organisation.

Diversity Infrastructure: Encompasses the systems, policies, and processes, aimed at fostering the attraction and inclusion of staff from diverse backgrounds. Equity of policy and practice supports the creation of a safe and respectful environments that accommodate and support a diverse range of needs. Data and insights will be used to refine and ensure that our policies and systems are effective and appropriate for our workforce.

Inclusive Development: How we contribute to the fair, inclusive and equitable experience of employees, particularly those from non-dominant groups, across the employee life cycle. This includes induction, promotion, remuneration, learning and development, and performance management.

Inclusive Culture: Effectively improving capability and opportunities to foster collaboration among individuals from dominant and non-dominant groups. This will empower all employees to actively contribute to creating a culture that promotes a sense of belonging and mutual respect for everyone. Psychological safety is key factor that will enable collaboration and an inclusive culture.

Social Impact: Refers to the proactive ways we identify and manage our impact and interactions with society, including employees, customers, stakeholders, and communities. Employees with a sense of impact and purpose through their work have increased productivity and better mental health and wellbeing. This component is externally focused which fits with the overall FMA strategy, Matangirua and purpose of the FMA.

Data and Insights: Gathering data and insights from different channels on a regular basis ensures we have a complete and current picture of DEI at the FMA. Quantitative and qualitative data will allow us to continually track and indicate areas of strength, weaknesses and opportunities that emerge over time.

Proposed DEI Framework

How

To embed the proposed DEI framework, we will implement a number of foundational activities under each of the components as outlined in Annex A.

To introduce the framework to our people, and increase engagement and ownership of DEI activities, we will develop a kete of resources to encourage self-directed development. This will include fact/tip sheets, self-assessments, learning modules, and direction to reputable outside information sources. Recognising varying levels of current knowledge, experience and capabilities within the FMA, we will ensure these resources are tailored and accessible to a diverse audience. These resources will build over time and include a range of DEI topic areas to encourage engagement from all parts of the organisation and ensure inclusiveness.

A communications approach has been developed to support the roll out of this work, beginning with the announcement of our DEI Champions network (initial Champions listed in Annex B). The ongoing communications and engagement will include a number of opt in activities over the next 12-months including workshops, discussion groups and 'In the Know' sessions. The Culture and Engagement team will continue to connect widely to ensure this approach remains employee-led and is therefore an authentic FMA journey.

FY 24/25 Focus Area

In addition to our work building DEI foundations, we will have a focus within the 24/25 FY on increasing awareness and capability around Neuro-inclusion within the FMA. There is considerable

research noting that over 20% of the population is neurodiverse, including a substantial portion of adults who are undiagnosed. It is therefore likely we have a high number of neurodiverse employees, both aware and unaware.
This focus area will be introduced by overlaying a neuro-inclusive perspective across all components of our DEI framework as we introduce it. Utilising the framework ensures a broad and comprehensive approach which will aim to drive improvement and behavioural change, while fostering psychological safety for all.

To support our neurodiverse individuals, it is important that we as an organisation have the understanding, strategies, and practices in place to help them thrive. To do this we must focus on educating and training leaders, ensuring they have the knowledge and confidence to tailor support to individual needs. Evidence suggests that accommodations that support neurodiverse individuals, such as short clear instructions, visual communication, and flexible work practices positively impact all individuals. Therefore, solutions and offerings we propose will be available to all staff to promote inclusivity.

Neurodivergent individuals, such as those with autism spectrum disorder (ASD), attention-deficit/ hyperactivity disorder (ADHD), and dyslexia, bring unique perspectives and creative problem-solving skills to teams. It is key we understand and hone the strengths neurodiversity brings, while supporting and addressing the specific challenges these individuals face. When we are able to do this, we will be better positioned to challenge the status quo and drive positive change.

Next Steps

- Paper will be presented to ELT 12th Sep, asking them to:
- Approve the proposed DEI framework and focus area
- Endorse FY24/25 Action Plan
- Nominate a DEI Champion from ELT
- Note, implementation of activity has already begun.

Component	Actions
Leadership	- Include question into interviewing of HO level and above roles related to their experience and commitment to DEI - Recruit DEI Champion from within ELT to visibly support initiatives and sponsor approach - Begin monthly reporting on diversity demographics (gender and ethnicity) of leadership in ELT and ELC levels - Continue to encourage ELT/ELC to sponsor FMA events and engage in formal and informal DEI conversations - Pilot TupuToa leadership programme (volunteers identified)
Diversity Infrastructure	- Review and update the DEI and related policy - Review and update the DEI guidelines - Refresh Ātea DEI page with new information to allow self-guided development - Update of recruitment demographic questions (done) - Create Ātea page with a record of employees who speak another language and can offer support with translations - Integrate DEI approach with wider People team offerings and action (including update of learning and development offerings)
Inclusive Development	- Ensure DEI lens is included in talent discussions, succession planning and development planning - Kia Toipoto reporting and next steps for closing pay gaps - Annual REM review mediation including consideration of living wage minimum represented in our process/policy - Consult with under-represented groups for insights and ongoing action planning - Pilot of Neurodiversity support offering (through Remarkable Minds) for individuals (done) - People team training session on Neuro-inclusion (done) - Incorporate leader guidance on DEI into the follow up from *Leading with Mana* and general guidance for managers - Review unconscious bias training and DEI focus in Bruce offerings and Hiring Manager training
Inclusive Culture	- Launch DEI Champions and invite participation - Offer a series of In the Know education sessions with DEI focus - Provide list of DEI considerations for physical office locations (done) Develop inclusion safety throughout FMA – building on Leading with Mana and Speak Up - Launch period product 'take one, give one' initiative - Advertise EAP support including Rongoā - Continue employee-led celebration of meaningful culture/ diversity events
Social Impact	- Ongoing partnerships with organisations to build awareness around scams, KiwiSaver etc - Pay it Forward – creating internal stories about the impact our contributions make - Encourage use of Volunteer days and offer centrally organised volunteer opportunities in Wellington and Auckland
Data and Insights	- Set up DEI focused data collection from channels including, EAP, Tono, Ātea, Exit interview - Collect qualitative data through individual interactions, and communications channels to track overall sentiment and commitment to DEI issues - Collect demographic data including disability, neurodiversity, sexual orientation, gender identity, ethnicity through HRIS and survey.

Annex A – Next steps: FY24/25 Action Plan

Annex B. Initial DEI Champions

1. [redacted] – Regulatory Delivery
2. [redacted] – Evaluation & Oversight
3. [redacted] – Strategy & Design
4. [redacted] - Strategy & Design
5. [redacted] – Regulatory Delivery
6. [redacted] – Response & Enforcement
7. [redacted] – Transformation and Operational Delivery
8. N[redacted] - Regulatory Delivery
9. [redacted] – Transformation and Operational Delivery

Champion Role:

Our DEI Champions have committed to actively promoting and striving to advance diversity, equity, and inclusion initiatives in the FMA. These Champions are our loud and proud diversity, equity, and inclusion supporters. While everyone has a role to play, these important volunteers are the ones who have agreed to be front and centre of our efforts.

- They help us celebrate and advocate for the importance of DEI.
- They are role models of inclusive behaviour and action.
- They have the courage to share their stories and want to hear yours.
- They advocate for and support underrepresented groups across our organisation.
- They are members, allies and advocates of our communities.
- They actively support our events and celebrations.
- They will seek broad input and listen to your suggestions about what we can do differently.
- They know how to share new ideas and with who, for maximum impact.
- They can discuss any issues you might be having or any concern you don't want to raise formally.

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DEI APPROACH: SEPTEMBER 2024

Purpose

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Proposed approach

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Consultation

In the process of developing this approach, the C&E team have consulted with the wider People Team, PAG, DEI Champions, and the Business Support team for feedback. The approach has been well received and supported.

Annex A – Next steps: FY24/25 Action Plan

Component	Actions
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Champion Role:

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FINANCIAL MARKETS AUTHORITY PEOPLE, PERFORMANCE AND REMUNERATION COMMITTEE

Meeting No. 61

15 April 2025

Agenda Item 3: Diversity, Equity and Inclusion – 6 monthly update

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People, Performance and Remuneration Committee Paper

15 April 2025

Diversity, Equity and Inclusion Update 2025

Purpose

As a 6-monthly agenda item, this paper provides the People, Performance and Remuneration Committee (the Committee) with an update on Diversity, Equity and Inclusion activity and other key initiatives requested by members.

Recommendation

We recommend the Committee:

a) **Note** and provide comments on the information included in this paper.

Background

This paper provides an overview of progress with Diversity, Equity and Inclusion (DEI) work since the approach was approved in September 2024. The workplan drives progress and provides accountability for our DEI commitments and goals, in-line with Public Service Commission guidance.

DEI initiatives offer numerous benefits, including fostering a more engaged and productive workforce, promoting innovation, improving employee retention, creativity, and a wider spectrum of viewpoints and enhancing a company's reputation and ability to attract top talent.

At the FMA we want everyone to feel respected, be supported, have a sense of belonging, and contribute without the need to conform to fit in. We want every employee to be valued and given opportunities to thrive. When people from diverse backgrounds collaborate, they contribute distinct experiences and insights, enhancing problem-solving and decision-making capabilities. They allow us to attract and retain a diverse talent pool, and helps the FMA better reflect the population of Aotearoa New Zealand.

OVERVIEW: DEI Progress

In September 2024 the ELT approved an updated DEI framework and approach, including a focus for the remaining Financial Year of neuro-inclusion. Since this time, the Culture & Engagement team have led several key DEI events and celebrations, driving some of our highest engagement rates, consulted with underrepresented groups at a number of targeted events, established our Champions network, and engaged with people across the organisation to gather feedback on what we're doing well and where we can improve. We now have 12 DEI Champions actively supporting and advancing our efforts,

supported by [redacted] our ELT sponsor. Together with the wider organisation we have completed 15 of the 39 action points we set out in the initial DEI paper and Kia Toipoto action plan, with a further six under action.

Notably in the last quarter, our Pride event, led by [redacted] and supported by ELT representatives [redacted] was a standout success. We had over 80 people show up in person to learn, connect, and show support for our rainbow communities. We also hosted our first internal International Women's Day (IWD) panel, facilitated by [redacted], featuring panellists [redacted] We had 110 people watch the panel live, with feedback highlighting appreciation of the panellists sharing vulnerable experiences to build understanding and deepen appreciation of the challenges still evident for women in the workplace.

Both events were featured on our external communication channels including LinkedIn, with each post generating strong engagement, as demonstrated in the table below. This emphasises that external stakeholders and consumers are keenly interested in the FMA's culture and our ongoing efforts in the DEI space.

LinkedIn Comparison

	FMA Video* Typically, video content is the best performer on LinkedIn	Pride	IWD
Impressions	901	3,476	6,005
Likes	58	115	114
Repost	4	1	1
Comments	4	5	3

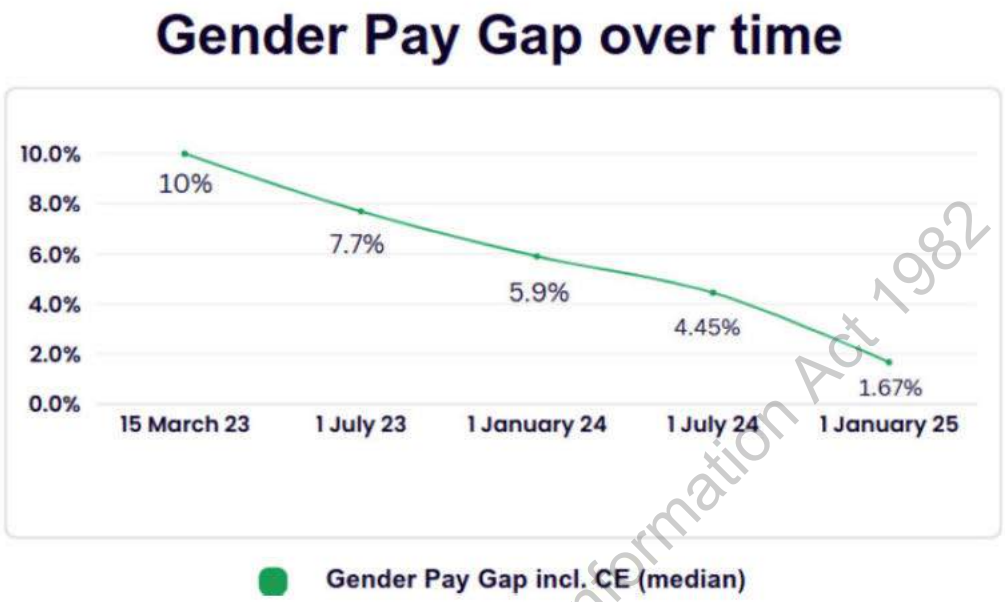
Kia Toipoto

Kia Toipoto is the Public Service Pay Gaps Action Plan, which focuses on closing gender, Māori, Pacific and Ethnic Pay Gaps to reduce workplace inequities. The three goals of Kia Toipoto are:

- Making substantial progress towards closing gender, Māori, Pacific, and ethnic pay gaps.
- Accelerating progress for wāhine Māori, Pacific women, and women from ethnic communities.
- Creating fairer workplaces for all, including disabled people and members of rainbow communities.

We have made substantial progress with our Kia Toipoto Action Plan. As of 1 January 2025, our Gender Pay Gap has decreased to 1.67% (median, including CE), or 1.73% (median, excluding CE). This is a significant improvement from 4.45% and 4.70% respectively in July 2024. Our Gender Pay Gap (incl CE) reduction represents an 8.33% decrease since the launch of the action plan in March 2023. While we're pleased with this progress, we acknowledge that the journey toward a fully inclusive and equitable workplace is ongoing. Our next focus area is calculating and understanding our Ethnic Pay Gap, for which we currently lack sufficient data. To support this, we have asked employees to voluntarily provide demographic information in Te Pātaka Haorongo (our HRIS). So far, 36 employees have contributed, and we are exploring ways to encourage further participation, including potentially

using data from the most recent Tono. This data is crucial for informing our future action plans and ensuring we effectively address any inequalities moving forward.



Focus Area 24/25 – Neurodiversity

Research from the 2022 NZ Workplace Diversity Survey, ADHD 2021 Survey and the Ministry of Health NZ, an estimated 20% of Kiwis are neurodiverse, 71% of adults with ADHD seek support to enhance their self-awareness and only 17% of Kiwis agree that senior leaders are equipped to effectively manage a neurodiverse workforce.

The organisation chose to focus on Neurodiversity in FY24/25 to help provide education, increase awareness and support staff who were neurodivergent themselves or experience neurodivergence outside of the workplace (e.g. via family members).

To wrap up our FY24/25 focus on Neurodiversity, this quarter we hosted an *In the Know* session for up to 30 leaders, with 26 participating. The session was personalised to address the specific questions submitted by attendees during registration. The feedback was overwhelmingly positive, with leaders expressing appreciation for the opportunity to engage with experts, ask critical questions, and strengthen their ability to foster more inclusive teams. This session also empowered leaders to approach challenging discussions with confidence, rather than shying away from them.

Over the past year, our emphasis on neurodiversity within the DEI framework has significantly contributed to creating a more inclusive and supportive environment at FMA. While the absence of comprehensive demographic data limits our ability to provide precise metrics, the direct qualitative feedback we've received reinforces our confidence in the positive impact on both individuals and teams. Notable in the Tono survey, the most disclosed disability/impairment was neurodiversity.

By raising awareness and building capabilities, we have created a foundation for better understanding and supporting neurodiverse individuals. Through continued education and training, leaders are becoming more equipped to tailor support to individual needs, while ensuring that solutions are inclusive and beneficial to all employees. These efforts support a shift in perspective, enabling us to

recognise and leverage the unique strengths that neurodiverse individuals bring to the organisation, such as creative problem-solving and diverse viewpoints. As we move forward, we remain committed to deepening our understanding of neurodiversity, fostering an environment where everyone can thrive and contribute to driving innovation and positive change.

Completed Actions:

- 8 individuals completed the 6-week Resilient Minds training
- 3 x In the Know sessions – Introduction to Neurodiversity, Parenting Neurodiverse Children, Leading Neurodiverse Team Members
- Created a Neurodiversity page on Ātea with resources
- People and Capability team training session
- Opinion Piece - The Neurodiverse Colleague You Didn't Know You Had (35 reactions and 188 views)
- Viva Engage Community – Neurodiversity Neighborhood (27 members and 13 posts in past 12 months, 78% of members reached)

NEXT STEPS:

Identifying FY 25/26 future focus areas, to be discussed and endorsed with ELT. These will be reported back to PPRC Members. Note, implementation of activity from the existing DEI plan will continue.

[redacted]
31 March 2025

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Leadership	Status	Progress Notes
Include question into interviewing of HO level and above roles related to their experience and commitment to DEI	Completed	
Recruit DEI Champion from within ELT to visibly support initiatives and sponsor approach	Completed	
Begin monthly reporting on diversity demographics (gender and ethnicity) of leadership in ELT and ELC levels	Ongoing	Some demographics reported, will build out as we gather more data
Continue to encourage ELT/ELC to sponsor FMA events and engage in formal and informal DEI conversations	Ongoing	
Pilot TupuToa leadership programme	Completed	Positive feedback - consider offering again
Diversity Infrastructure		
Review and update the DEI and related policy	Underway	People policy review in progress, due Nov 25
Review and update the DEI guidelines	Underway	People policy review in progress, due Nov 25
Refresh Ātea DEI page with new information to allow self-guided development	Completed	Ongoing updates
Update of recruitment demographic questions (done)	Completed	
Create Ātea page with a record of employees who speak another language and can offer support with translations	Completed	
Integrate DEI approach with wider People team offerings and action (including update of learning and development offerings)		
Consideration of gender affirmation leave	Underway	People policy review in progress, due Nov 25
Hiring manager training	Underway	Training material developed, under final review
REM education for 2025	Underway	To be booked for April 2025

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Advertise salary bands on all roles	Completed	Salary bands are on PDs which are advertised with roles. Expected salary range is disclosed on relevant roles
Living wage agreed for all roles within FMA	Completed	
Inclusive Development		
Ensure DEI lens is included in talent discussions, succession planning and development planning	Ongoing	
Kia Toipoto reporting and next steps for closing pay gaps	Completed	
Annual REM review mediation including consideration of living wage minimum represented in our process/policy		
Consult with under-represented groups for insights and ongoing action planning	Ongoing	
Pilot of Neurodiversity support offering (through Remarkable Minds) for individuals (done)	Completed	
People team training session on Neuro-inclusion (done)	Completed	
Incorporate leader guidance on DEI into the follow up from Leading with Mana and general guidance for managers		
Review unconscious bias training and DEI focus in Bruce offerings and Hiring Manager training	Underway	
Continue commitment to Tupa Toa interns	Ongoing	
Inclusive Culture		
Launch DEI Champions and invite participation	Completed	
Offer a series of In the Know education sessions with DEI focus	Ongoing	
Provide list of DEI considerations for physical office locations (done)	Completed	
Develop inclusion safety throughout FMA – building on Leading with Mana and Speak Up		
Launch period product 'take one, give one' initiative	Completed	
Advertise EAP support including Rongoā	Completed	
Continue employee-led celebration of meaningful culture/ diversity events	Ongoing	
Social Impact		

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Ongoing partnerships with organisations to build awareness around scams, KiwiSaver etc	Ongoing	
Pay it Forward – creating internal stories about the impact our contributions make	Ongoing	
Encourage use of Volunteer days and offer centrally organised volunteer opportunities in Wellington and Auckland		
Data and Insights		
Set up DEI focused data collection from channels including, EAP, Tono, Ātea, Exit interview	Ongoing	
Collect qualitative data through individual interactions, and communications channels to track overall sentiment and commitment to DEI issues	Ongoing	
Collect demographic data including disability, neurodiversity, sexual orientation, gender identity, ethnicity through HRIS and survey.	Ongoing	Tono 95% participation rate with 89.6% of demographics disclosed.
Monthly diversity reporting to ELT	Ongoing	Currently reporting monthly on gender, plan to add ethnicity as the data becomes available.

AUGUST 2024

Kia Toipoto Action Plan 2024-25

Closing Gender, Māori, Pacific and Ethnic Pay Gaps

Kia Toipoto is the Public Service Pay Gaps Action Plan, which focuses on closing gender, Māori, Pacific and Ethnic Pay Gaps to reduce workplace inequities.

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Kia Toipoto and the FMA

Kia Toipoto is the Public Service Pay Gaps Action Plan, which focuses on closing gender, Māori, Pacific and Ethnic Pay Gaps to reduce workplace inequities. The three goals of Kia Toipoto are:

- Making substantial progress towards closing gender, Māori, Pacific, and ethnic pay gaps.
- Accelerating progress for wāhine Māori, Pacific women, and women from ethnic communities.
- Creating fairer workplaces for all, including disabled people and members of rainbow communities.

Here at the FMA, we aim to be a diverse, inclusive, and equitable workplace for all. We are committed to reducing our pay gaps and ensuring the FMA is a fair and equal place for all employees. Our commitment to Kia Toipoto and all aspects of Diversity, Equity, and Inclusion (DEI) are a continuous journey without a defined conclusion. This means we will continue working with our kaimahi to understand what matters most to them and how we can improve.

Underpinning our commitment to Kia Toipoto is our workplace strategy, Matangirua – our te ao Māori strategy, and our values. Our values give us the confidence and inspiration to pursue our role as kaitiaki of the financial services with mana, manaaki, tiaki, and tika.

Our values in relation to Kia Toipoto

Ensuring all our kaimahi live our values as intended and use them to drive positive workplace behaviour helps us to deliver on our diversity, equity, and inclusion goals and implement our Kia Toipoto action plan.

Manawa Rangi – look to the horizon

We are future focused and proactive in our approach to diversity, equity and inclusion and managing pay gaps. Manawa rangi acknowledges that this is a continuous journey without a defined conclusion, we will remain open to the new ways we can improve and ensure equity for all. Committing to annual reporting and action planning that involves reflection on our progress means that our approach is purposeful and aligned to future organisational needs.

Manawa Ora – open hearts, open minds

At the heart of this value lies a commitment to understanding and being our full selves while acknowledging, empowering, and respecting others, honouring their mana. We encourage our kaimahi to demonstrate self-awareness, empathy, and humility which allows them to accept and celebrate differences. Manawa ora is central to ensuring our kaimahi accept and celebrate diversity and continue to strive to create belonging for all.

Manawa Tahi – help the team work

Embracing the unique perspectives and experience of every individual allows us to ensure all voices are heard and contribute to our organisational experience and journey. We ask our leaders and kaimahi to role model vulnerability to actively build psychological safety and trust. Manawa tahi creates an environment where collaboration is encouraged, and our kaimahi are open to learning from each other.

Manawa Nui – make the calls

This value empowers all our kaimahi to act and speak up for what is right, fair, and just, and have the courage and confidence to act with initiative. We develop our organisational knowledge through curiosity, testing assumptions, and data-informed insights. This process is applied to our diversity, equity, and inclusion work, ensuring our progress is employee-led and relevant. Manawa nui ensures we remain genuine in our commitment and dedication to delivering these important initiatives.

To shape FMA's Kia Toipoto Action plan, our People and Capability team engaged with groups across our organisation, including our Executive Leadership Team, DEI Champions, and People Advisory Committee.

To assist in these conversations, we provided information on our gender pay gaps and progress, the assessment of our progress, and our proposed action plan. We asked for feedback to help us understand what might be driving our pay gaps, what barriers we might be facing, and for any other insights into the perceptions of fairness and equity at the FMA. We will continue to partner with our staff throughout our journey and we aim to engage regularly with our kaimahi to ensure our approach and actions remain employee led.

Our Progress

Since reporting under Kia Toipoto, the FMA has made considerable progress reducing gender pay gaps through a commitment to balanced recruitment and remuneration analysis.

Incomplete data has meant we have been unable to baseline or report on ethnic pay gaps, however with the implementation of a new HRIS later this year we will be able to begin data collection. Gathering data to baseline and improving insights from our data is a key focus for this year.

Over the last 12-months the FMA has invested significantly, establishing our Culture and Engagement team who lead the organisations Diversity, Equity, and Inclusion approach. This means we now have the dedicated resource to implement a comprehensive DEI approach including driving the actions associated with our Kia Toipoto action plan.

The organisation has reviewed our employee benefits and taken the time to considered how we continue to develop our offering to be more inclusive and equitable. We have successfully implemented changes to policies, updated trainings, and communicated openly to ensure all kaimahi are a part of the journey.

We are proud to now offer all permanent kaimahi access to free Health and Life insurance through our FMA benefits. This offering aligns with our te ao Māori Strategy, embodying Maanaki, the essence of nurturing and caring for others. Recognising that Māori have among the lowest rates of insurance of all ethnic groups in New Zealand, and a lower proportion of women have cover than men, this offering highlights the steps the FMA are taking to make this more accessible to all kaimahi.

We have also committed to paying all staff the living wage or above, supporting them to thrive rather than survive. The living wage refers to a base level that allows an employee to afford housing, food, healthcare, and other necessities with the objective to increase the standard of living in Aotearoa.

To better support our staff during parental leave, we introduced two new benefits:

- Parental Leave Top-Up Payments: This benefit is designed to provide additional financial support during this critical time, helping to ease the financial burden commonly associated with taking parental leave.

- Continued KiwiSaver Contributions: This initiative aims to mitigate the impact of parental leave on retirement savings, addressing the often-experienced retirement pay gap that can affect those who take time off for parental responsibilities.

These enhancements underscore our commitment to supporting our employees financially and ensuring their long-term financial well-being during and after parental leave. Importantly, these benefits are available to all primary carers, regardless of gender.

While we have made significant progress over the past year, we recognise that our journey towards creating a fully inclusive and equitable workplace is ongoing. The steps we have taken, ranging from addressing gender pay gaps and enhancing our DEI initiatives, to expanding employee benefits and better supporting our people embarking on parenthood, reflect our dedication to continuous improvement. We are committed to leveraging the insights from our new HRIS and continuing to engage with our kaimahi to further refine our approach to DEI and progress with Kia Toipoto.

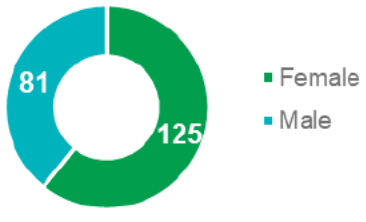
Demographics

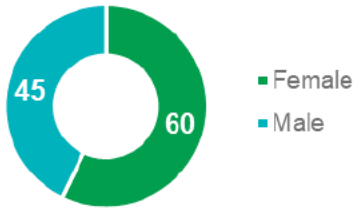
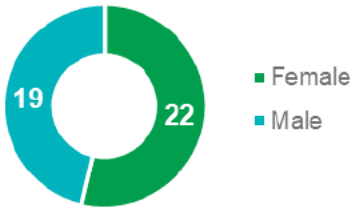
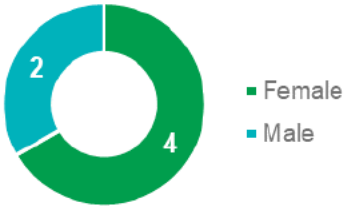
Due to the nature of our current employee data, we cannot accurately report on ethnicity, disability or rainbow community representation or calculate our pay gaps in these areas. We will be asking staff to voluntarily disclose this information using our new HRIS in late 2024 and hope to be able to report on this later in the year. In addition to collecting data in these three areas, part of our action plan is to focus on engaging with these groups of people and adjusting our action plan to reflect this progress.

As at 1 July 2024:

- We have 352 employees; 207 are female and 145 are male.
- We have more females than males in all bands but one.
- We have more females than males working part time.

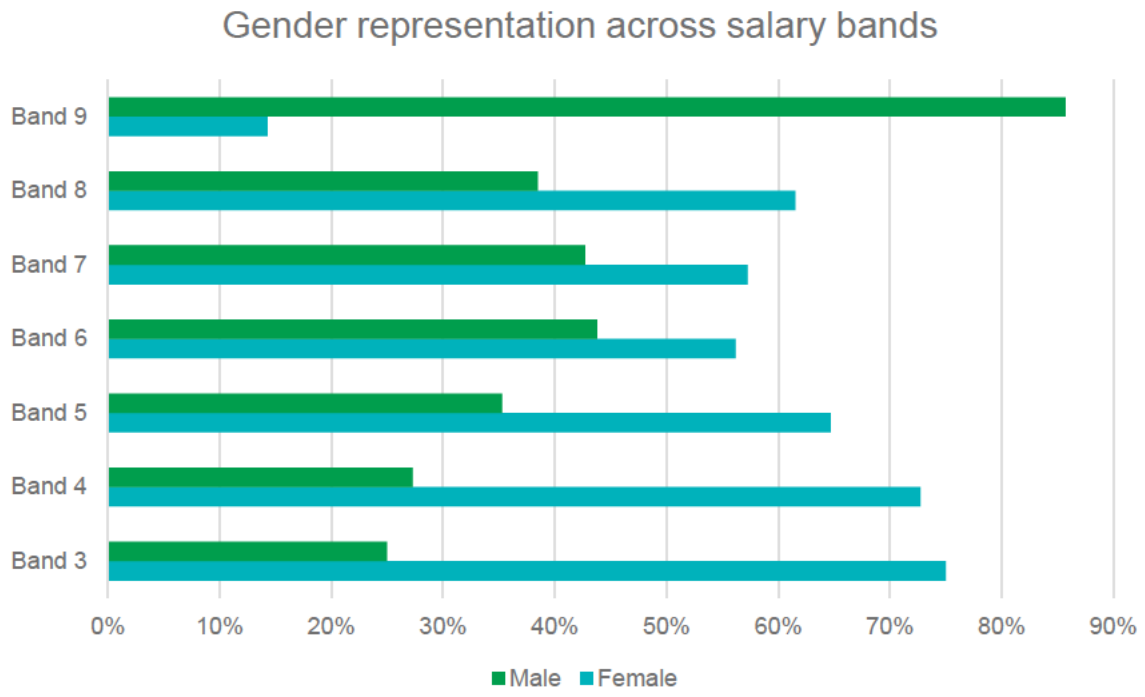
Our organisation is structured with cohorts, the purpose of these cohorts is to create a less hierarchical approach to how we define roles within the FMA and to encourage collaboration across all levels.

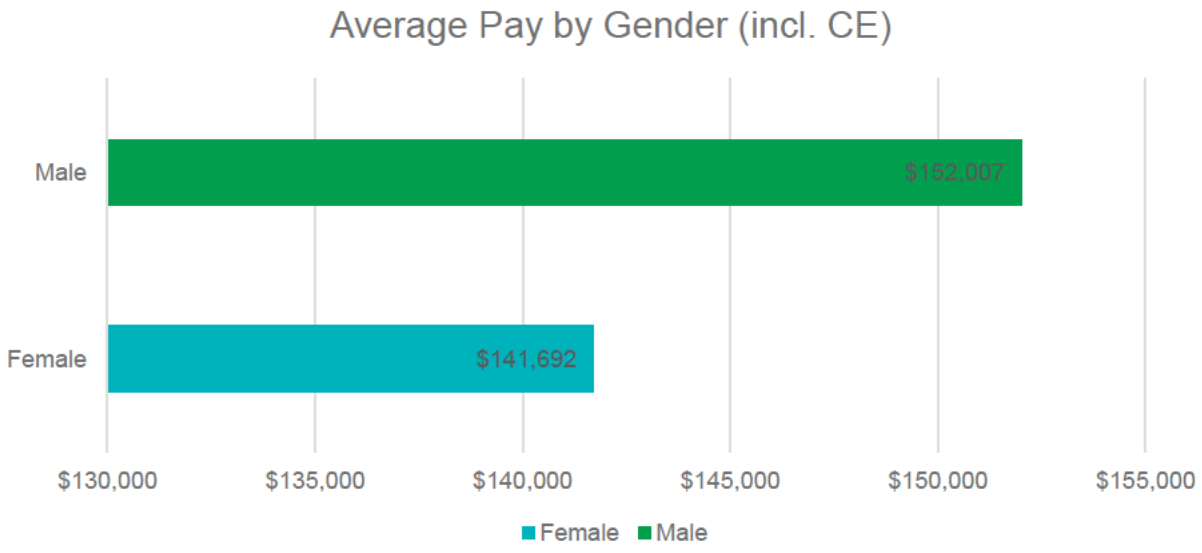
Cohort	Purpose and roles	Gender Representation
Collaborative Cohort	The cohort is comprised of Receptionists, Team Support Administrators, Personal Assistants, Executive Assistants, Associate Advisers, Coordinators, Senior Advisers, Senior Legal Counsels, and Senior Analysts. The purpose of this cohort is to support, contribute to and deliver strategy for the FMA.	

Strategic Leadership Cohort	This cohort is comprised of Principle Advisers and Managers who inform and deliver strategy for the FMA.	
Enterprise Leadership Cohort	This cohort is comprised of Technical Specialists, Heads of, Directors, Chiefs, and our Executive Leadership Team. This cohort shape, communicate and deliver strategy for the FMA.	
Executive Leadership Team	Comprised of Executive Directors and Chief Executive.	

Current Data Representation

As at 1 July 2024	Workforce representation %	All people leaders %	People Leaders in Enterprise Cohort %
GENDER			
Female	58.81%	56.31%	52.78%
Male	41.19%	43.69%	47.22%
***ETHNICITY**	*We do not have data available to report on ethnicity representation.*		



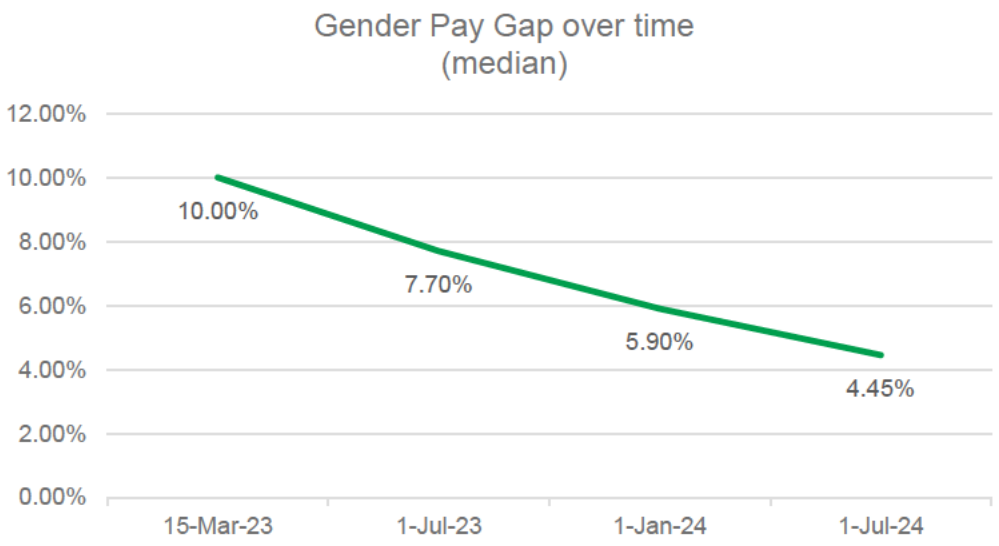


Current Gender Pay Gap

To calculate our pay gap, we have used base hourly rate pay for all permanent, fixed term and casual employees.

As of 1 July 2024, our overall organisation gender pay gap (based on the median hourly rate, including the CE) is 4.45%. Since our first Kia Toipoto action plan published 15 March 2023, our gender pay gap has reduced by 5.55%.

	Gender Pay Gap (excl. CE)	Gender Pay Gap (incl. CE)
Median	4.70%	4.45%
Mean	8.30%	6.79%



The current vertical gender representation across salary bands 3 through 6 reveals a higher proportion of females, which is contributing to our overall gender pay gap. To address this imbalance and work towards gender parity, we are committed to ensuring a balanced gender pool in our recruitment processes across all salary bands.

At the pay equity level, equal pay for roles of equal size, we have a good level of equity for our kaimahi and our data indicates the following:

- Bands 3 and 4 have median pay gaps in favour of females, primarily due to a higher proportion of females in these roles.
- Bands 5 and 6 have relatively neutral median pay gaps, indicating a balanced distribution of gender in these bands.
- Bands 7 and 8 have very slight positive median pay gaps, with a near-equal gender distribution.
- Band 9 has a significant positive median pay gap in favour of males, due to a higher proportion of males in this band.

Progress and Next Steps

Kia Toipoto focus area and milestones		Planned actions 24/25	Our Goal
Te Pono | Transparency	Agencies and entities publish annual action plans based on gender and ethnicity data and union/employee feedback.	Create and publish annual action plan Continue to publish annual action plan on internet and intranet Commit to publishing salary bands on all jobs Publish annual DEI approach and action plan Annual education session on REM system for leaders and FMA-wide (completed)	FMA are known as a fair and equitable employer. Our brand is seen as an optimal choice among a diverse candidate pool. Our commitment is that we will: • Continue to monitor and adapt our Kia Toipoto action plan and DEI approach in collaboration with our kaimahi. • Publish Kia Toipoto tracking and action plans internally and externally. Our kaimahi are comfortable disclosing demographic data with the understanding that this will guide our approach going forward.

Kia Toipoto focus area and milestones		Planned actions 24/25	Our Goal
Ngā Hua Tōkeke mō te Utu | Equitable pay outcomes	By the end of 2022 entities ensure that starting salaries and salaries for the same or similar roles are not influenced by bias.	Launch HRIS system allowing for data collection of additional demographics including ethnicity and disability to inform pay gap calculation Continue applying a gender parity lens ahead of the annual remuneration review process and bi-annual junior promotion rounds.	FMA have fair and equitable policies and processes that support all our kaimahi. We are committed to ensuring equitable pay outcomes and access to suitable benefits. Our kaimahi understand and trust our systems and processes knowing that we strive to do right by our kaimahi.

		Implement living wage minimum	
		Implement hiring manager training (including unconscious bias guidance)	
		Promote additional benefits offered to employees and whānau – EAP (Rongoā)	

Kia Toipoto focus area and milestones		Planned actions 24/25	Our Goal
Te whai kanohi i ngā taumata katoa | Leadership and representation	By 30 April 2023 agencies/entities have plans and targets to improve gender and ethnic representation in their workforce and leadership.	Launch HRIS system allowing for data collection of additional demographics including ethnicity and disability to track and report on representation	FMA use data and insights to inform the picture of our workforce and our goals to improve it. Our kaimahi have trust and confidence we are collecting demographic data for appropriate purposes and have voluntarily disclosed this information: • We have a disclosure rate of 75% for ethnicity data. • We are confident our data is accurate. • We are able to measure and analyse ethnic representation across the workforce and by leadership level. Our commitment to improving external engagement and positive social impact for Māori consumers and providers sees us becoming an employer of choice and attracting a more diverse candidate pool.
		Include mandatory question into interviewing of all 'Head of' level and above roles assessing experience and commitment to DEI	
		Begin monthly reporting on diversity demographics (gender and ethnicity) of leadership in ELT and ELC levels	
		Embed Matangirua (our evolved te ao Māori strategy), which aims help the FMA apply a critical lens to the finance system as it is experienced by Māori consumers and providers, and to use our position to promote and advocate for fairness.	

Kia Toipoto focus area and milestones		Planned actions 24/25	Our Goal
Te Whakawhanaketangai te Aramahi | Effective career and leadership development	By mid-2023 agencies/entities have career pathways and equitable progression opportunities that support women, Māori, Pacific and ethnic employees to achieve their career aspirations.	Consistently apply a DEI lens on talent discussions, development and succession planning Explore leave option to support employees undergoing transition Continue to commit to our Tupa Toa intern programme, including converting a minimum of two (25%) to graduate roles each year Implement trial of Tupa Toa leadership programme	FMA offer a range of career and development opportunities to our kaimahi at all levels. Opportunities are customisable to suit differing career aspirations and life stages recognising that one size will not suit all. We actively seek to understand the needs of our kaimahi and match our offerings to this. When considering our organisational talent profile, we actively seek to understand impacts on various underrepresented groups. We strive to ensure consistency and transparency in promotion and career decisions. Our kaimahi trust in these processes and are confident to access the support and development that suits their needs and aspirations.

Kia Toipoto focus area and milestones		Planned actions 24/25	Our Goal
Te whakakore i te katoa o ngā momo whakatoihara, haukume anō hoki | Eliminating all forms of bias and	By the end of 2023 entities have remuneration and HR systems, policies and practices designed to remove all forms of bias and discrimination.	Review of unconscious bias training Update recruitment demographic questions	We are confident that our policies and processes and fair and equitable and all our kaimahi are supported. Our confidence in the FMA systems means we are in a position to actively improve representation through targeted sourcing, attraction, and selection strategies.

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