

Te Tari Ture o te Karauna Crown Law

Kia Toipoto Pay Gap Action Plan
2024/25

At Crown Law we build a better Aotearoa through responsible, lawful Government

We help to ensure: Democracy that serves all New Zealand | Government Decisions that inspire confidence | Justice that strengthens communities

We want to ensure Crown Law is a safe and inclusive workplace for all kaimahi.

To support this, our Diversity, Equity and Inclusion Plans are currently in separate documents which will develop over 2025 into one cohesive plan:

DE&I plan 2024/25

Kia Toipoto

Our 24/25 Action Plan aligns to the goals set out in Kia Toipoto

2021-2024 Public Service Action Plan which are to:

- Make substantial progress toward closing gender, Māori, Pacific, and ethnic pay gaps.
- Accelerate progress for wāhine Māori, Pacific women, and women from ethnic communities.
- Create fairer workplaces for all, including disabled people and members of rainbow communities.

Papa Pounamu

Papa Pounamu sets the diversity and inclusion work programme for the wider Public Service. It covers 5 priority areas that are focused on making the most positive impact across all diversity dimensions

- Te Urupare i te Mariu | Addressing bias
 - Hautūtanga Kākano Rau | Fostering diverse leadership
- Te āheinga ā-ahurea | Cultural competence
- Ngā tūhononga e kōkiritia ana e ngā kaimahi | Employee-led networks
- Hautūtanga Ngākau Tuwhera | Inclusive leadership

4 Point Rainbow Action Plan

Foundational four-point plan to embed opportunities for Rainbow people in the Public Service

The Public Service overall goal is to make substantial progress towards achieving the following four outcomes over the timeframe of the plan July 2023 – 2025

- Increased visibility and information
- Increased numbers of people
- Promote greater inclusion and remove barriers
- Identify and close inequities

4 Point Disability Action Plan

Foundational four-point plan to embed opportunities for tāngata whaikaha Māori and disabled people in the Public Service

The Public Service overall goal is to make substantial progress towards achieving the following four outcomes over the timeframe of the plan July 2023 -2025

- Increased visibility and information
- Increased numbers of people
- Improved accessibility
- Identify and close inequities

Whāinga Amorangi

Whāinga Amorangi is a standalone programme of work aimed at building Māori Crown Relations capability in the public service. For Crown Law this means building our internal capability. Our 2024/25 Whāinga Amorangi Plan will focus on providing learning opportunities for our kaimahi to reach or exceed the “comfortable” level of the individual capability component of the Te Arawhiti framework; NZ History / Te Tiriti, Māori world view, tikanga and te reo Māori. This work can play a role in supporting our DEI priorities by helping Māori kaimahi feel like they belong and can bring their whole selves to work.

Introduction

The delivery of Kia Toipoto: Public Service Pay Gaps Action Plan will continue to be a strategic priority for Crown Law as part of our overall approach to Diversity, Equity and inclusion. We remain committed to making progress – working on this with our people, people networks, the Public Service Association (PSA) and Te Kawa Mataaho Public Service Commission in order to achieve the Kia Toipoto goals.

Achievements over the last year have included strengthening our Employee Led Networks with additional support, designing our Leadership Expectations and Behaviours with our Leadership Team and implementing them to give clarity to our leaders.

Our pay gaps are mostly due to our workforce having a higher proportion of women, Pasifika and MELAA in support roles than in our more senior leadership or counsel roles. Eliminating our pay gaps completely relies on having more even representation at every level of our organisation.

We know there is work we need to do to create an inclusive work environment in order to attract, retain and develop a diverse workforce that is representative of Aotearoa.

This action plan represents our focus for the next year till we combine this plan with our DE&I Plan as per guidance from Te Kawa Mataaho.

Developing our Action Plan

Our 24/25 Action Plan aligns to the goals set out in Kia Toipoto 2021-2024 Public Service Action Plan which are to:

- Make substantial progress toward closing gender, Māori, Pacific, and ethnic pay gaps.
- Accelerate progress for wāhine Māori, Pacific women, and women from ethnic communities.
- Create fairer workplaces for all, including disabled people and members of rainbow communities.

The 24/25 Action Plan is refreshed from our 23/24 plan which was developed in partnership with employees from across Crown Law, the PSA and with our people networks. We anticipate further collaboration with these groups mid 2025 when we work to combine this plan with our Diversity, Equity and Inclusion Plan in line with guidance from Te Kawa Mataaho.

This work will require a long-term approach, and we remain committed to high levels of employee involvement in the wider DE&I programme.

In refreshing this plan, we have updated actions not complete from last year and added a small number new planned actions for the 24/25 financial year.

This plan may be read in conjunction with our current 24/25 Diversity Equity and Inclusion Plan as there are overlaps in actions.

Key Insights

Since 2017, we have seen a significant decrease in our overall gender pay gap (GPG) reducing from 30% in 2017 to 17% in 2024.

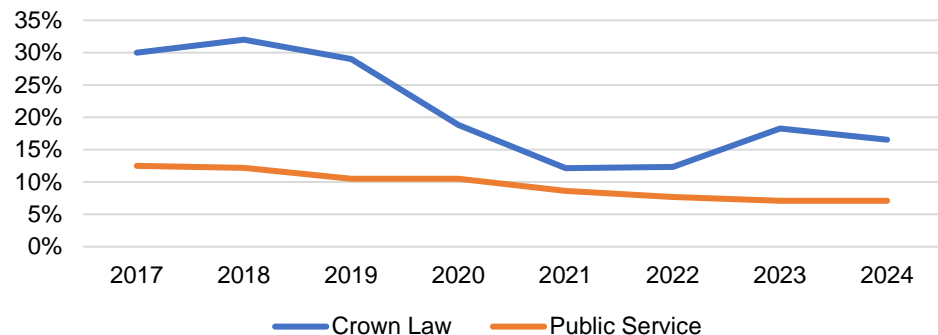
In the past year we have reduced our pay gaps for Pacific Peoples from 27.9% in 2023 to 22.26% in 2024, and for MELAA EPG from 44.33% to 36.35%. Both Māori and Asian pay gaps have increased slightly. This is due to:

- Low numbers of people in each category, which means large fluctuations if one or two people move roles
- Several targeted reviews to address potential gender or ethnic pay issues applied through the annual pay gap review.
- Our remuneration framework and starting salary guidance has helped to address our gender and ethnic pay gaps as they remove potential unconscious bias.

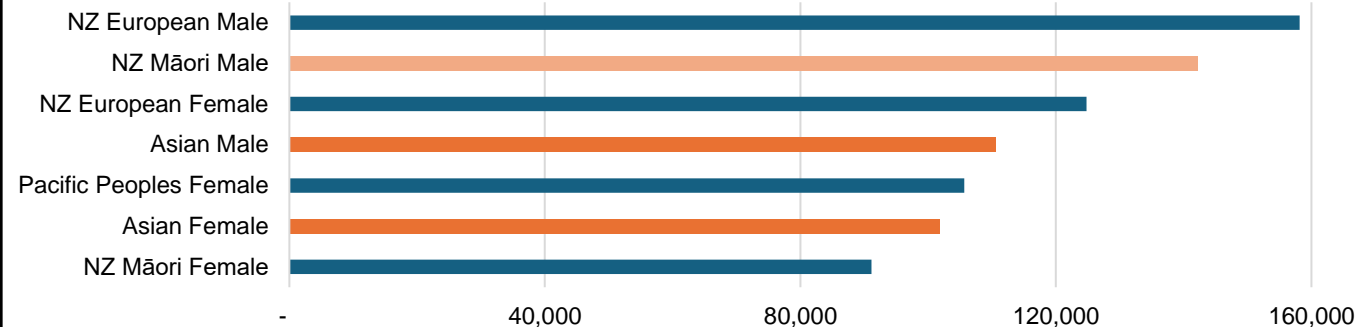
While we have made significant progress, our overall gender pay gap is still higher than the public service average of 6.1% in 2024 and we have more work to do to reduce the pay gaps for employees in minority groups.

Our pay gaps are mostly due to our workforce having a higher proportion of women, Pasifika and MELAA in support roles than in our more senior leadership or counsel roles. Eliminating our pay gaps completely relies on having greater ethnic representation at every level of our organisation.

Gender pay gap since 2017



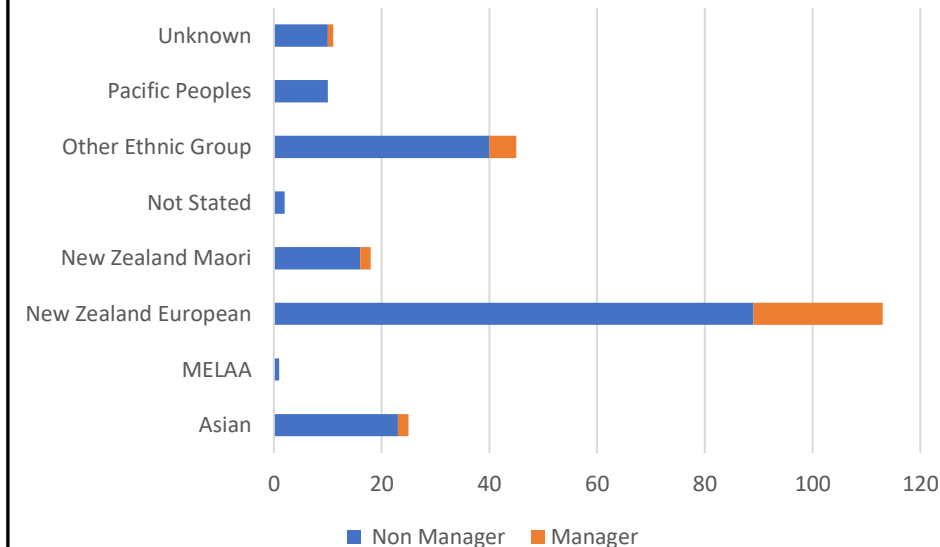
Average salaries by gender and ethnicity 2024



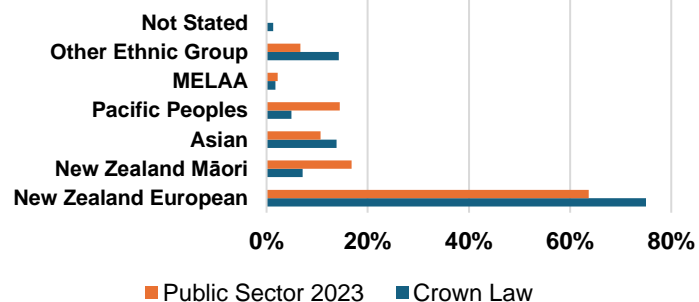
Ethnic pay gaps 2023 v 2024

	2024	2023
NZ Māori	12.48%	8.89%
Pacific Peoples	22.26%	27.90%
Asian	19.80%	12.00%
MELAA EPG	36.35%	44.33%

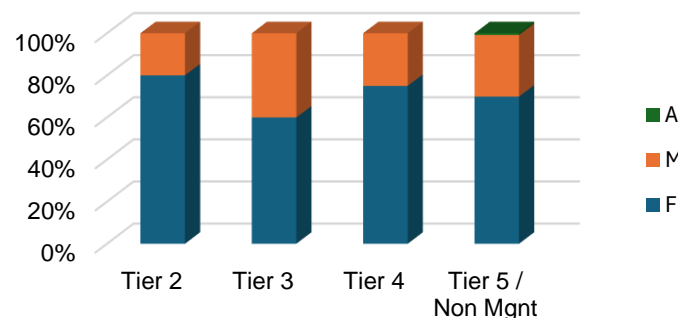
Management representation by ethnicity



Ethnicity representation versus the public sector



Management level by gender



Progress to date

- ✓ We continue to work with the step-based remuneration framework (co-designed with the PSA).
- ✓ We continue to use starting salary guidance and publish remuneration bands in all job ads.
- ✓ We have completed a review of most key HR Policies and procedures with the remainder at final check stage or under re-scope due to changes in Government direction (e.g. Recruitment and Flexible working). Reviews include a consistent style with plain English.
- ✓ We have streamlined induction processes and published clear documentation of roles and responsibilities.
- ✓ We have updated intranet HR pages and included a last updated date. This is a precursor to a project to update our Intranet to a new platform in 2025.
- ✓ HR contact information is readily available with photos on our intranet.

What we will do over the 24/25 year

- Continue with finalising the review and update of our suite of HR policies and processes using a consistent style and simpler language
- Review the session delivery models for induction to see if this can be streamlined to be more efficient while continuing to provide the information needed by our new starters in a timely manner.
- Engage with the intranet update project to ensure the HR information needed by our employees is easy to find, understand and use.

How we will measure success

Managers and employees report that the HR policies and information are clear and straightforward to understand and use

Induction continues to be fit for purpose for our new starters and is delivered in an efficient way for the business.

Progress to date

- ✓ Since 2018 our gender pay gap has decreased from over 30% to 17%
- ✓ Our annual pay gap reviews continue to give us confidence there are no gaps when we compare like for like roles – however having greater diversity across more senior roles would further contribute to decreasing our pay gaps
- ✓ We are in the process of implementing a new payroll system which will support us to develop clearer reporting on potential pay gaps and drivers. It will also support people to enter and update ethnicity information themselves and we have updated the gender declaration options in line with recommended reporting standards
- ✓ Policies and processes are updated where possible to address areas where our employees have told us bias can exist
- ✓ Completed involvement in pay equity claims (admin and clerical)

What we will do over the 24/25 year

- Continue to provide unconscious bias training opportunities – online and in person
- Continue to be involved in pay equity claims
- Carry out the annual pay gap review process
- Update performance and development processes and tools to ensure quality conversations about career development are held

How we will measure success

- Number of people taking up training opportunities
- We will continue to monitor starting salaries to have confidence that they are not influenced by bias
- We continue to review and monitor pay gaps in like for like roles with the need for remediation reduced to zero

What we have done

These milestones weren't all specifically identified in our previous Kia Toipoto plans; however, some actions have been completed.

- ✓ Reporting on our representation regarding gender and ethnicity for leadership and other roles.
- ✓ Improving access to flexible working at all levels of the organisation
- ✓ Supported our Employee Led Networks through access to a small budget to support the development of inclusion initiatives
- ✓ Implemented a career development framework for Assistant Crown Counsel roles
- ✓ Implemented Leadership Expectations and Behaviours to give clarity on what is expected of our leaders
- ✓ Began regular Lunch and Learn sessions for bite sized learning for our leaders/managers
- ✓ 80% of our Employee Led Networks have Terms of Reference and plans for the coming year
- ✓ Increased followers of LinkedIn by 26% to attract more people to roles

What we will do over the 24/25 year

- Continue to support our People Networks to thrive – we will encourage and assist Networks to refresh their purpose and terms of reference, offer a sponsor and information about budgets for events.
- Continue to increase LinkedIn and social media presence to attract more diverse people to roles.
- Build on the Leadership Expectations and Behaviours to embed into performance and development planning processes and provide learning opportunities.
- Continue to work on equitable access to management and leadership development, including equitable processes for selection.
- Explore the establishment of an alumni network to stay connected with people who have left, are overseas, on secondment, or on parental leave.
- Explore succession planning and what this looks like at Crown Law to ensure development pathways.

How we will measure success

Continue to monitor our workforce representation, at all levels (gender and ethnicity) to become more representative of Aotearoa

Monitor and record people attending learning and development opportunities to confirm equitable processes are carried out

What we have done

- ✓ We have refreshed our offerings in Māori cultural competence through a targeted RFQ process and contracting two providers to deliver training options
- ✓ 65 people are enrolled on 12-month online learning towards the requirements of the comfortable level of Whāinga Amorangi
- ✓ We have continued to offer unconscious bias workshops
- ✓ Most key HR Policies and processes have now been reviewed. Reviews include a consistent style with simpler language. This includes more detailed guidance on use of Learning and development and study leave policy
- ✓ Soft launched a process called Explore step to assist people speaking up and knowing where to get assistance
- ✓ Our “Ways of Working” have been refreshed as our Crown Law Values. They are displayed prominently in the office and opportunities to give positive feedback have been implemented in the form of shoutouts in staff newsletter and postcards

What we will do over the 24/25 year

- Ensure we have a safe way to speak up if there is a policy or expectation that doesn't fit with a person's culture.
- Continue to support and provide learning opportunities in line with our Whāinga Amorangi commitments
- Continue to promote and encourage the Crown Law Values, explore bringing in additional guidance on giving constructive feedback
- Continue to encourage the appropriate celebration of culture and language events
- Continue to expand use and understanding of Explore step with our people
- Explore cultural competence training across cultures and ethnicities that make up New Zealand and Crown Law; and continue to support Māori cultural learning opportunities to enable Crown Law to work in New Zealand's legal landscape.
- Work with our people via our Employee Led Networks to better understand the range of ethnicities and cultures at Crown Law, their needs and how the perspectives they bring can benefit our work and our work community

How we will measure success

Keeping track of numbers of employees taking up education to increase cultural competence, and asking for feedback about it

Continue to monitor to have confidence that our HR policies, processes and systems are free from bias and discrimination – and we will continue to work in partnership with our employees, networks and unions to identify and address any potential bias or discrimination as it occurs

What we have done previously

- ✓ Our refurbished office encourages desk sharing with personal lockers and caddies to encourage flexible working
- ✓ We have improved policies, processes and access to flexible working

What we will do over the 24/25 year

- We will engage with the government's guidance on flexible and hybrid working and update our policies and procedures accordingly
- Through our Financial Sustainability Programme, we will be looking at workflow processes and what core work should be prioritised and how this may impact flexible working

How we will measure success

We will monitor and ask for feedback to have confidence that flexible working and any changes made does not impact pay and progression opportunities