Gender Pay Gap Action Plan 2021





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Introduction

Closing our gender pay gap (GPG) is a long-term priority of Te Tāhū o te Ture and Te Arawhiti, and we remain committed to making progress – working on this with our people, the Public Service Association (PSA) and Te Kawa Mataaho Public Service Commission.

We have made positive steps over the last year, while navigating challenges that have resulted in progress being uneven. There remains a lot more work to be done, as we will only reduce our GPG through sustained effort over many years. One of our major achievements over the last year was the equal pay work, which gave us certainty that gender is not a factor in salaries for the same or similar roles.

This action plan represents our focus for the next year. Above all else, last year's work has made it clear that our primary goal must be to work towards achieving a consistent gender balance at every Ministry level. Our workforce is predominantly women (68%), but this representation is higher in lower-paid frontline roles, and lower in higher-paid management roles. We will not be able to eliminate our GPG until this representation is more even across the board.

Developing the GPG Action Plan 2021 – 2022

The 2021/22 action plan was developed by staff from across Te Tāhū o te Ture. The initial work was done by members of the People Experience team, with a draft plan circulated for feedback to PSA organisers and delegates, as well as the Ministry's people networks. This feedback was assessed and integrated into the final published plan. It is unquestionable that the insights of our employees challenging the initial thinking has greatly strengthened the planned activity.

We remain committed to high levels of employee involvement in the GPG programme. We are currently reviewing the governance arrangements for the programme, and intend to re-establish a working group of employees, PSA representatives and workstream leads to support its delivery. The role of this group will be to provide oversight and strategic direction for the Programme, and to support the Programme Manager to ensure delivery of outputs and achievement of outcomes.

Structure

This plan starts by presenting and analysing the GPG data for Te Tāhū o te Ture and Te Arawhiti with a focus on the major driver of our GPG. This is followed by a summary of progress over 2020 – 2021, organised by workstream, and lastly an overview of the plans for 2021 – 2022.

Data and analysis

All data quoted in this report was sourced by Te Tāhū o te Ture as at 30th July 2021.

Notes

Te Arawhiti

Te Arawhiti, the Office for Māori Crown Relations, is a departmental agency of Te Tāhū o te Ture. This Action Plan, and the analysis of our GPG, encompasses both Te Tāhū o te Ture and Te Arawhiti data.

New payroll system - gender and ethnicity identification

In 2020 the Ministry implemented a new payroll system. This system allows employees to selfidentify both their sex and gender (previously only sex was recorded and available to use for GPG calculations).

The Ministry has also applied Te Kawa Mataaho Standards of Workforce Information for collection of ethnicity data. Employees can self-identify with up to three different ethnicities consistent with the standard classification across New Zealand.

Gender

The majority of Ministry employees are female (68%). This is the case across almost all levels of the organisation and 80% of our pay bands.

MoJ Gender	Fen	nale	Male		Gender Diverse		Unknown		Total
Breakdown	No.	%	No.	%	No.	%	No.	%	Staff
All Managers	330	60.1%	216	39.3%	0	0.0%	3	0.5%	549
Non Managers	2686	69.4%	1169	30.2%	1	0.0%	12	0.3%	3868
Overall	3016	68.3%	1385	31.4%	1	0.0%	15	0.3%	4417
Senior Management (Tier 2&3 Managers)	35	53.8%	29	44.6%	0	0.0%	1	1.5%	65

Diagram 1

[&]quot;Unknown" is staff members who have chosen not to have a gender recorded in our payroll system.

GPG Definition

The GPG is a calculation that compares the difference in hourly earnings between all men and women within an organisation. This comparison does not consider other factors such as differences in the role performed or an individual's experience, skills or education.

It can be calculated using mean (average) or median annualised salaries.

Te Tāhū o te Ture has an average GPG of 12.9%

This is a 0.9 percentage point (pp) increase compared to the same time last year.

There has been a 5.4pp decrease in our average GPG since 2015 (reducing from 18.3% to 12.9% in 2021).

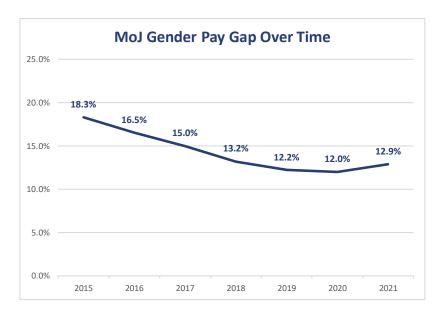


Diagram 2

Reason for the increase in GPG

Even though we made great progress in all four workstreams last year, our GPG still increased slightly. This was due to two main factors:

 Employee movement. As staff join and leave the Ministry, the proportion of male and female employees across our pay bands change. The proportion of females increased in lower pay bands and decreased in our higher pay bands. See the **drivers** section for a full breakdown of our occupational vertical segregation. 2. Salary changes (existing staff). There were multiple reasons for salary changes including remuneration increases, new roles, and equal pay increases. All of these increased the overall average salaries for females and males, however the increase in males' salaries was proportionally larger. This was due to an existing allowance being rolled into base salary for two typically male-dominated roles (Court Security and Bailiffs).

We have a median GPG of 3.2%

The median GPG compares the difference in middle salary between men and women (50% of employees earn more or less than this number).

Why the large difference between average and median?

60% of Ministry employees fall into our lowest 20% of pay bands. 4% of Ministry employees fall into our highest 20% of pay bands. Due to the majority of staff being in the lower pay bands, the middle (median) salary for both females and males is relatively close.

Average salary is largely affected by the distribution of males and females throughout the pay bands. This is explained in the **drivers** section.

Equal Pay Gaps

The Ministry measures GPGs across our different pay bands as a like-for-like comparison. This calculation does not consider factors such as an individual's experience, skills or education.

13 of our pay bands have at least 20 females and 20 males to conduct this analysis.

- 42% of our pay bands have GPGs between -1% and 1%.
- 92% of our pay bands have GPGs between -3% and 3%.
- One pay band (J09) has a larger than 3% GPG (3.9%).

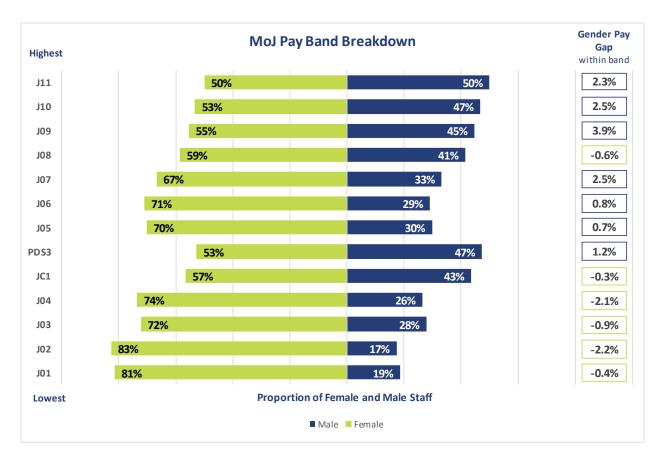


Diagram 3

See the Equal Pay part of the **Progress in 2020 – 2021** section for how we test and make sure we have no unjustified equal pay gaps.

Ethnicity

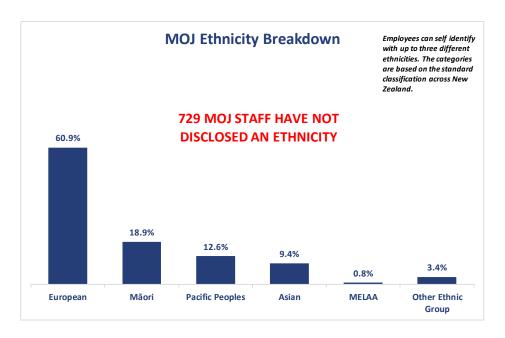


Diagram 4

As we have implemented a new payroll system, our percentage of staff who have disclosed at least one ethnicity is lower than we would like for the robustness of our analysis. Currently 83% of staff have disclosed at least one ethnicity in our payroll system.

We aim to increase this to at least 90% through clear communication with staff on the purpose of collecting this information.

The number of Māori employees continue to grow across the Ministry. The percentage remains well above the NZ population (16.7% - Stats NZ 30 June 2020) and the Public Service average (14.7% - Te Kawa Mataaho30 June 2020).

We also have a high percentage of Māori employees across our leadership:

- Overall 18.9%
- Management 21.2%
- Senior Management (Tier 2&3) 19.6%

The following graphs show the average and median salaries of Ministry employees by ethnicity and gender.

Through our new workstream "A More Representative MoJ" we will be analysing whether vertical occupational segregation is the cause of the below disparities. We will then create a plan forward to resolve these issues.

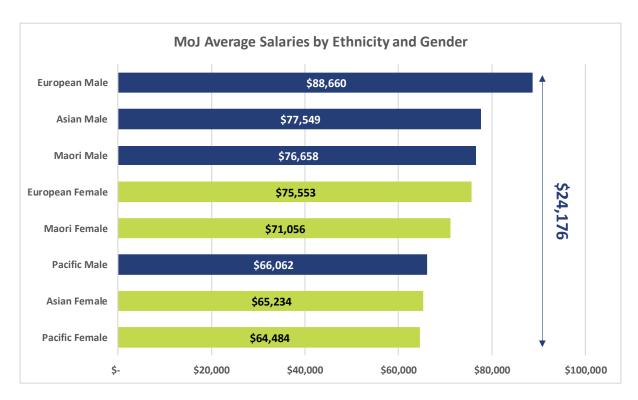


Diagram 5



Diagram 6

Ethnic Pay Gaps

Even though we currently do not hold the 90% targeted disclosure rate, we have begun our analysis of the Ministry's ethnic pay gaps. We have used the following guidance from Te Kawa Mataaho when calculating ethnic pay gaps:

Source: 'Guidance Measuring and beginning to address Māori and Ethnic Pay Gaps in the Public Service'

MoJ - Ethnic Pay Gaps					
Ethnicity Group	Average	Median			
Asian	9.0%	6.4%			
European	-15.4%	-7.8%			
Māori	4.7%	-1.6%			
MELAA	6.2%	5.6%			
Pacific	15.7%	7.3%			
Other	11.8%	8.3%			

Diagram 6

European is the only ethnicity with a negative average ethnic pay gap (in favour). This means on average non-Europeans are earning 15.4% less than Europeans. Both European and Māori have negative median ethnic pay gaps.

As stated before, we are in the early stages of analysing and understanding our ethnic pay gaps.

When calculating Māori and ethnic pay gaps, give all employees one of the following mutually exclusive values for each of the <u>level 1 ethnic groups:</u>

- '1' this employee identifies with this ethnic group
- '0' this employee does not identify with this ethnic group
- · NULL this employee did not disclose their ethnic identity

Every employee who discloses an ethnicity is included in every ethnic pay gap calculation (either as a '1' or a '0').

Employees who disclose more than one ethnicity are included as '1's' in more than one ethnic pay gap calculation. As a result, employee numbers by ethnicity may add up to more than the agency's total number of employees.

All employees who did not disclose their ethnicity are excluded from calculating Māori and ethnic pay gaps.

Māori and ethnic pay gaps are calculated as the difference between the average salary for an ethnic group ('1') and the average salary of all those not in that ethnic group ('0'), expressed as a percentage of the average salary of those not in the ethnic group ('0'). For example, the pay gap for Māori is calculated as:



This approach has been developed by Te Kawa Mataaho to report Māori and ethnic pay gaps at <u>a Public Service wide level</u>.

Through our Equal Pay work stream, we will be including ethnicity where possible to make sure we have no unjustified pay gaps in like-for-like roles based on ethnicity.

Drivers of our GPG

Vertical occupational segregation

Vertical occupational segregation refers to the distribution of workers within occupations based on different demographic characteristics such as gender, ethnicity and age. In Te Tāhū o te Ture, occupation refers to roles within the same pay band or 'like-for-like' roles. Through the extensive equal pay statistical analysis last year, that will be repeated in 2021/22, we can be confident that we have no unjustified equal pay gaps within like for like roles.

Like many other agencies, nearly 100% of Te Tāhū o te Ture's GPG is the result of vertical occupational segregation. Females make up 68% of all staff inside Te Tāhū o te Ture, but this percentage is not consistent across our different pay bands. Without changing average salaries, if each pay band had the same proportion of females as the overall proportion (68% currently) then the GPG would be 0.3%. This is referred to as 'perfect integration' and is the foundation of our new GPG workstream, "A More Representative MOJ".

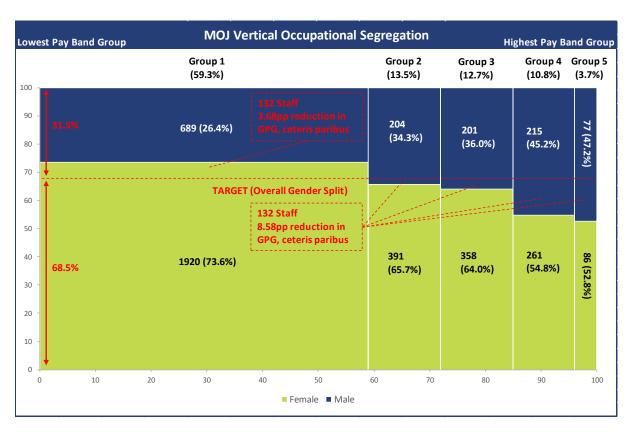


Diagram 7

To create diagram 8, we have ordered our 35 pay bands (including 'grandparented' bands) by midpoint and combined them into five groups of seven. 59.3% of staff fall into the lowest paying group (Group 1) and 3.7% of our staff are in the highest paying group (Group 5).

Vertical occupational segregation can be seen in diagram 8. The proportion of females in Group 1 (73.6%) is greater than the overall representation of females at the Ministry (68%). In addition, the proportion of females in every other group is not only below the overall proportion but declines as the pay bands increase to group 5 (52.8%).

The area above and below the target line represents the change in distribution needed for perfect integration. All else remaining the same (ceteris paribus), if our gender distribution in Group 1 was equal to our overall distribution, our GPG would decrease by 3.7pp.

There is a cumulative effect on the decrease in GPG as multiple groups are adjusted. This is because the overall gender distribution fluctuates as each group nears perfect integration.

If we were to have perfect integration, our GPG would decrease by 12.6pp. This would leave Te Tāhū o te Ture with a 0.3% average GPG. The 0.3% is what could be considered the sum of all justified equal pay gaps within like for like roles.

We will be conducting a similar analysis regarding ethnicity to see if vertical occupational segregation is also the driver for our different ethnic pay gaps. We will also be including ethnicity where possible in our 2021/21 equal pay statistical analysis.

Progress in 2020 - 2021

Equal Pay

Te Kawa Mataaho milestone

Agencies have ensured gender is not a factor in salaries for the same or similar roles.

Actions taken

Te Tāhū o te Ture has ensured that gender is not a factor in salaries for the same or similar roles.

Over the last year, the Ministry developed a methodology to investigate equal pay using regression analysis. We communicated with all employees about the process, and developed guidelines for managers about the methodology. We also connected our work to the wider public sector through the Equal Pay cross-agency working group.

The analysis showed that equal pay issues make up a very small contribution to our overall GPG. As at 30 June 2021, 0.3pp of our 12.9% GPG is caused by "equal pay" – the differences between average salaries in like-for-like roles.

We identified that only one pay band had potential evidence of gender-based pay bias – and that was in favour of women. Further investigation showed that the issue in this pay band was due to an allowance that a specific group of employees received. This allowance was rolled into the employees' salary as part of the 2019/20 remuneration round, which resolved the issue.

A line-by-line review ensured there were no outliers causing unjustified pay gaps in like-for-like roles. In this review we analysed all employees with a position in range of 97% or below who had a tenure of more than 2.5 years. From this review we identified a small number of employees who were potentially out of step with where they would be expected to be. We investigated the specific situations for each person in this group of employees with their managers, who recommended salary changes as appropriate. These recommendations were moderated by more senior managers. The primary reason behind the salary anomalies for the identified employees was low starting salaries as a result of; change processes, historical hiring practices, common practices around internal hires, or pay band changes.

This review resulted in equal pay remuneration increases for 98 Ministry employees, comprising 71 (72%) women and 27 (28%) men.

Evidence of outcomes

The annualised cost of these changes in the 2020/21 financial year was \$422,859, split \$301,707 to women and \$121,152 to men. Women received proportionately larger increases on average: 4.3% compared to men at 3.7%.

These changes resulted in a minor 0.03pp decrease in the Ministry's GPG from 11.70% to 11.67%. This figure was in line with our initial analysis that showed that equal pay makes up a very small proportion of our overall GPG. While we had previously believed this to be the case, analysing the data in this way means that we have the evidence to support that belief.

Flexible by default

Te Kawa Mataaho milestone

Agencies have:

- trialled flexible-by-default practices
- flexible-by-default policies and systems in place which are aligned with the flexible-by-default guidance.

Actions taken

Te Tāhū o te Ture is trialling flexible-by-default practices.

Covid-19 accelerated some aspects of applying flexible working while highlighting challenges and opportunities with the Ministry's flexible-by-default approach. The Ministry is working towards normalising flexible work for all employees across all roles and ensuring that flexible working does not negatively affect career advancement or professional development.

A 'Flexi Working Group' was established to provide insight and input into the initiatives, policy, and communications around flexible working. The working group is made up of representatives from across the Ministry and it is open to anyone who would like to contribute.

The Ministry developed and communicated an initial suite of supporting resources for all employees and amended our Flexible Working Policy to incorporate the Ministry's developing approach. We updated our data collection and reporting processes so we can better understand uptake and began to work with the Digital Office on addressing technology barriers.

We are currently in the process of finalising an updated Flexible Working Arrangements Policy in consultation with key stakeholders including the Flexi Working Group and the PSA. Over the next few months, communications and resources for leaders and teams will be rolled out, including clarity on the definitions and types of flexible working, guidance managers and their teams to discuss and address flexible working, and tips for leading flexible teams.

Evidence of outcomes

The Ministry's recruitment specialists indicate a growing interest in flexi-working amongst applicants. Further evidence of the adoption of this practice is anticipated once the Flexible Working Arrangement Policy is rolled out.

No bias or discrimination in remuneration systems or human resource practices

Te Kawa Mataaho milestone

By the end of 2020, agencies have:

- engaged with the Taskforce guidance (recruitment; career progression, breaks and leave; remuneration)
- a plan and target date for reviewing HR policies and practices with unions and employees to align with this guidance
- ensured all mangers have completed bias training OR are scheduled to do so within a certain period of starting in their role
- a plan in place to provide all relevant staff with bias training on an ongoing basis.

Actions taken

Te Tāhū o te Ture has engaged with the guidance on recruitment, career progression breaks and leave, and remuneration. Over the last year we have established a working party, reviewed and incorporated guidance provided by Te Kawa Mataaho, created a monitoring tool for reporting, and obtained data on applications and appointments to check gender and ethnicity calculations.

Our remuneration policy and recruitment policy has been reviewed, taking into account the gender pay principles. We have reviewed our Performance Management Policy and related documentation in relation to the PDP (Performance and Development Plan) process and template – focusing on improving the connection to career development and supporting career aspirations.

We have been working with external providers on unconscious bias training and resources and have a plan in place for all managers and relevant staff, such as our People Experience team, to conduct the training. This training is designed to raise awareness of bias and lift capability around decision making in a non-biased way. The foundations for this training follow engagement with the PSA, behavioural science specialists, and employee networks representing women, cultural and professional groups. Input was sought regarding their views of what is important to address on bias in the context of the Ministry environment.

We will adopt a blended approach to give different target audiences the appropriate guidance and support. This may include a facilitated workshop for senior managers in addition to the online module.

We are looking to make relevant resources available for all our employees as part of our induction and orientation programme.

Building our cultural capability

Te Kokenga is our programme to build Māori cultural capability, and is part of Te Haerenga, the Māori strategy for Te Tāhū o te Ture. Te Kokenga is a multi-year programme that aims to build the capability of our employees and the Ministry overall to deliver services with and for Māori, to enable us to better deliver on our responsibilities.

A key foundation of Te Kokenga is our new learning framework, Kōkiri, which provides learning to support all employees to build confidence regardless of where their journey starts. Kōkiri includes a comprehensive online toolkit of te reo and tikanga Māori resources, remotely delivered te reo Māori classes both for beginners and those with advanced te reo capability, workshops on the history of Māori-Crown relations in Aotearoa, and a te reo coaching programme for senior leaders.

Our Ātea a Rangi business group are running quarterly wānanga, the purpose of which is to connect with Māori communities directly, develop and deepen participants' understanding of whakaaro Māori and mātauranga Māori through immersive exposure and applied experience, and challenge participants' ways of thinking and improve how the Ministry engage with and partner with Māori. It is our intent to ensure the local Ministry staff are included in these wānanga and there is a demonstrable link to Te Tāhū o te Ture priorities.

Evidence of outcomes

- Online Unconscious Bias module has been developed and will be rolled out in 2021.
- Starting salary guidelines are embedded in the recruitment process.
- Our Performance and Development Plans have a stronger focus on career development.
- 520 people participated in the Wall Walk workshops focused on the history of Māori-Crown relations in Aotearoa, with 95% saying that after the workshop they felt able to explain the ongoing effects of colonisation, compared with 55% beforehand.
- Te reo Māori classes had good participation in 2020/21:
 - 209 people completed the Rea Wānanga online introductory course
 - 55 people attended a two-day online immersion event for te reo speakers, with 87% reporting increased confidence in te reo Māori as a result
 - 100% of our Strategic Leadership Team and 66% of our Strategic Management Team participated in a te reo coaching programme.

Gender-balanced leadership

Te Kawa Mataaho milestone

Agencies have a target date and plan for achieving gender balance in their top leadership positions.

Actions taken

In the last year the Ministry did a deep dive into the experiences and perspectives of women in leadership positions. We conducted focus groups and interviews to go alongside our quantitative data analysis, and created a current state assessment, engaging with the PSA and an internal working group along the way. We also had the assessment reviewed by an external advisor.

The assessment included a series of recommendations which were developed in conjunction with the PSA and the Ministry's Women's Network. The recommendations were agreed by the Ministry's Strategic Leadership Team, and we began implementation.

Work since then has included activity to:

- Strengthen and improve awareness of existing talent management processes and policies
- Create new development opportunities and support for our senior women leaders (primarily tier four)
- Increase the uptake of 360° developmental surveys
- Improve our guidance around secondments
- Partner with Victoria University of Wellington to send Ministry staff on their Aspire women's leadership development programme.

Evidence of outcomes

- As at 1 March 2021, 50% of senior leaders (defined as tiers two and three) at Te Tāhū o te Ture are women, and 60% of leadership roles below tiers two and three are held by women.
- More women employees are contacting the Ministry's People Experience team seeking out leadership development advice aligned to their career development goals, such as requests for information and resources, courses, and specific career opportunities
- There has been an increase in the number and quality of nominations for centrally funded development programmes as well as a steady increase in the uptake of 360° surveys and re-surveys.
- There is now more transparency of secondment opportunities, increased awareness of the value of secondments as development opportunities and a significant increase in the number of advertised secondments
- Seven women leaders from the Ministry are currently participating in the Aspire Women's Leadership Programme from Victoria University of Wellington.

Additional information

Administrative and Clerical Pay Equity Claim

"Pay equity is about women and men receiving the same pay for doing jobs that are different but are of equal value. It recognises that while on the surface two jobs may look very different to each other, they require the same or similar degrees of skills, responsibility, conditions, experience and effort."

- Te Kawa Mataaho, Public Service Commission

At Te Tāhū o te Ture, there is currently one pay equity claim underway, the **Administrative and Clerical Pay Equity Claim**.

On 31 October 2019, the PSA raised a pay equity claim on behalf of PSA members who perform "Clerical and Administrative" work. These roles are predominately performed by women and may be undervalued due to gender. This claim is large, complex, and covers many roles across the public service.

Within Te Tāhū o te Ture, the claim covers around 130 unique roles, and over 50% of employees; the majority being female. As this is a large and complex claim, we do not have a set date for settlement. Any settlement which results in an increase of remuneration will reduce our overall GPG.

We are currently working with Te Kawa Mataaho and the PSA joint working party, to organise employee and manager interviews as part of the job evaluation process.

For more information please see the following pages:

- Te Kawa Mataaho Public Services Commission Clerical & Administrative Pay Equity Claim
- The Gender Pay Gap and Pay Equity

Plans for 2021 - 2022

Equal Pay

Goal

We have no unjustified pay gaps in like-for-like roles.

Drivers

- Internal appointments to roles receive a lower average starting salary than external appointments.
- Current policy for change processes and job evaluation commonly sees employees appointed on either current salary or 85% position in range, not taking into account experience or other relevant factors.
- 2019 remuneration increases created some relativity issues between some long-serving staff and those with just over two years' service.

Actions

- Conduct the equal pay analysis to monitor movement and make sure we continue to meet the milestone.
- Identify and close unjustified gender and ethnic pay gaps and outliers.
- Change remuneration policy so demographic factors and the GPG are considered when determining starting salaries.

Progress indicators

- Indicator: Unjustified gender or ethnic pay gaps across pay bands
 - Measure: Regression analysis by pay bands and deep dive into outliers.
 - Target: No unjustified gender or ethnic pay gaps in pay bands and no unjustified outliers.

Flexible by default

Goal

We are a recognised flexible-by-default organisation.

Drivers

- Anecdotal evidence suggests that those working more flexible hours traditionally progress more slowly, and proportionally more women than men take up flexible working options.
- Interpretation and application of the flexible working policy is inconsistent across the Ministry
 and within business groups: not all types of flexibility are available for all roles and not all
 requests are treated the same way.
- Lack of flexibility reinforces gender segregation of roles, e.g., women leave manager roles for lower-paid roles with greater flexibility.

Actions

- Update and clarify our flexible working policy, procedures, and tools, with a focus on operational environments.
- · Monitor uptake of flexible working.

Progress indicators

- Indicator: Employee perceptions about flexible working at the Ministry
 - Measure: Staff surveys.
 - Target: Increases in positive sentiment from Ministry employees about flexible working arrangements.

No bias or discrimination in remuneration systems or human resource practices

Goal

There is no bias or discrimination in our remuneration systems or human resource practices.

Drivers

- Managers inconsistently apply HR practices.
- The cultural lens that employees bring with them is seen as an add-on rather than fundamental to business success.
- Perceptions about the 'best candidate' for a role are subject to bias.

Actions

- Continually review and improve remuneration and HR policies, systems and processes, including starting salaries.
- Continue to build managers' understanding of remuneration and HR policies.

- Monitor and adapt recruitment practices to ensure we have a workforce that represents New Zealand.
- Build capability of leaders and other relevant staff in overcoming unconscious bias.
- Look at our induction and orientation approach to make unconscious bias resources available for all our employees.
- Monitor bias in remuneration and HR systems.

Progress indicators

- Indicator: Unjustifiable differences in remuneration for work in the same role
 - Measure: Equal pay reviews.
 - Target: No unjustifiable differences in remuneration for work in the same role.
- Indicator: Delivery of suitable unconscious bias training
 - Measure: Unconscious bias training completion rates for managers and relevant staff.
 - Target: at least 90% of designated audience complete training within six months of starting employment at the Ministry.

A more representative Ministry

This workstream replaces and includes the 'Gender balanced leadership' workstream from previous GPG action plans.

Goal

Perfect Integration: the gender split across our 5 different pay band groups matches the overall Ministry gender split.

This will be expanded to include Ethnicity after we have conducted analysis on our ethnic representation.

Drivers

- Vertical occupational segregation: females make up 68% of all staff inside Te Tāhū o te Ture, but this 68% is not consistently represented across our different pay bands (see Diagram 8).
- Gender and ethnicity stereotypes and unconscious bias affect the types of jobs people apply
 for and the sectors they are employed in, e.g., security roles are typically performed by men
 while administration or service roles are typically performed by women; ethnic minorities are
 more prevalent in operational roles and less so in corporate and higher leadership roles.
- The historic undervaluing of women's work has meant that these professions potentially
 have lower rates of pay. See Pay Equity for the work we are doing on the Administration and
 Clerical Pay Equity claim.

Actions

- Make roles and job ads more attractive and acceptable for all genders.
- Increase the number of women and ethnic minority applicants and appointments in higherpaid bands.
- Monitor balance of all genders in our leadership.
- Build a representative pipeline of future leaders.

Progress indicators

- Indicator: gender split across different roles
 - Measure: Pay band groups with a gender balance split that matches the overall Ministry gender balance
 - Target: Groups 1 to 3 are within 3% and groups 4 and 5 are within 8% of the overall gender split, by December 2022 (see diagram 8 for how this is measured and represented).
- Indicator: Women in senior leadership
 - Measure: Women in tier two and three leadership roles
 - Target: 50%, by December 2021.



