

Employment Relations (Employee Remuneration Disclosure) Submission

December 2024



Tirohanga Whānui | Overview

The New Zealand Council of Christian Social Services (NZCCSS) welcomes the opportunity to provide feedback on the proposed amendment to the Employment Relations Act 2000, which seeks to protect employees who discuss or disclose their remuneration. NZCCSS strongly supports this kaupapa as a step toward enhancing pay equity, transparency, and fairness in workplaces across Aotearoa New Zealand. As a representative of over 230 social service organisations, NZCCSS is committed to a just and compassionate Aotearoa that upholds the dignity of work and ensures equity in employment practices.

Taunakitanga | Recommendations

Our main points are:

Item One – We support employees’ ability to discuss their remuneration

We support greater pay transparency. Pay secrecy contributes to systemic inequities, particularly gender and ethnic pay gaps. Enabling employees to openly discuss their remuneration can help uncover and address disparities that disproportionately affect women, Māori, Pasifika, and other marginalized groups [1, 2].

Many sectors in New Zealand, including the community and social services sector, rely on government funding and have long-standing pay disparities. By facilitating open discussions about remuneration, this amendment can help highlight inequities and build the case for adequate funding and pay adjustments across sectors.

Recommendation one: We support this amendment as a useful mechanism for fostering pay equity and urge its swift passage.

Item Two – Stronger measures are needed to promote transparency and pay equity

The ability for individual employees to discuss their remuneration is an important first step, but it is by no means sufficient. Addressing structural inequities that perpetuate pay disparities requires measures to strengthen transparency and promote pay equity.

Internationally, legislative measures that have been adopted include requiring employers to publish pay equity reports, conducting equal pay audits to identify and address disparities, granting employees the right to request information on pay levels and implementing sanctions or incentives to ensure compliance with pay transparency laws [3].

Recommendation two: We urge the Committee and Parliament to consider stronger measures to increase pay transparency and pay equity.

Item Three – Alignment with Human Rights Principles

Restricting employees from discussing their remuneration conflicts with their rights to freedom of expression and undermines their ability to advocate for fair treatment. The proposed protections strengthen workers' agency and ensure compliance with the principles enshrined in the Human Rights Act 1993.

Recommendation three: The amendment should explicitly reinforce employees' right to freedom of expression in employment contracts.

Tohutoro kua tohua | Selected references

[1] Mind the gap (2021) *Ethnic and Gender Pay Reporting for Aotearoa / New Zealand: The Case for Change and Policy Recommendations*. https://diversityworks.nz/media/5440/mind-the-gap-the-case-for-change-gender-and-ethnicity-pay-gap-reporting_dec-2021.pdf

[2] Te Kāhui Tika Tangata Human Rights Commissioning (2021) *Inquiry into the Pacific Pay Gap*. tikatangata.org.nz

[3] International Labour Organization (2022) *Pay transparency legislation: Implications for employers' and workers' organizations*. Available on www.ilo.org.

Relevant NZCCSS submissions on equity, include:

- [Treasury's Long-term Insights Briefing on Sustainable and Resilient Fiscal Policy Over Economic Cycles](#)
- [Sentencing \(Reform\) Amendment Bill](#)
- [Sentencing \(Reinstating Three Strikes\) Amendment Bill](#)

Ko wai tātou | Who we are

NZCCSS has six foundation members; the Anglican Care Network, Baptist Churches of New Zealand, Catholic Social Services, Presbyterian Support and the Methodist and Salvation Army Churches. Through this membership, NZCCSS represents over 230 organisations providing a range of social support services across Aotearoa. We believe in working to achieve a just and compassionate society for all, through our commitment to our faith and Te Tiriti o Waitangi. Further details on NZCCSS can be found on our website www.nzccss.org.nz.

Ingoa whakapā | Contact Name

Rachel Mackay
Daniel Campbell