

September 2025

FSC Debrief – Employment Relations (Employee Remuneration Disclosure) Amendment Bill

Background:

This submission was a collaboration between the Regulation Committee and FSC Empower Women. Reducing the gender pay gap is a key issue and we mobilised quickly to respond to the Select Committee’s call for submissions.

[Education and Workforce Select Committee Report](#)

Final Act [here](#)

Overall:

- **Addressed:**
 - Protection for employees who disclose or discuss remuneration (clause 110C).
 - The objective of promoting pay transparency and enabling discrimination to be identified and remedied.
 - Alignment with the broad intent to reduce the gender pay gap.
- **Not Addressed (as beyond the Act’s scope):**
 - The specific link between gender pay gap and KiwiSaver contribution and retirement preparedness.
 - Alignment with the Retirement Commission’s National Strategy and broader financial capability initiatives.

Proposal	FSC Submission Recommendation	Final amendments	Outcome indicator
			Poor Medium Good
Purpose and scope of the Bill	We submitted that reducing the gender pay gap matters to our members and welcomed the Bill as an important step in protecting employees who discuss or disclose remuneration. We highlighted research showing the link between the gender pay gap and the retirement savings gap.	The Employment Relations (Remuneration Disclosure) Amendment Act 2025 inserts new provisions into the Employment Relations Act 2000 that protect employees who disclose or discuss their remuneration. The Act reflects the intent we supported.	

Clause 110C(1): Protection for remuneration disclosure	We submitted strong support for clause 110C(1) as it protects employees who discuss or disclose their remuneration, which promotes transparency and enables pay discrimination to be identified and remedied.	Section 110C of the Act provides that an employee is not subject to adverse treatment for disclosing or discussing their remuneration or for requesting information about remuneration.	
Objective of pay transparency and addressing pay discrimination	We submitted that greater transparency in pay will enable gender pay discrimination to be identified and remedied. We emphasised that disclosure and reporting drive action on closing pay gaps.	The Act's explanatory note and amendments confirm the objective is to promote transparency in remuneration and enable discrimination to be more readily identified.	