

8 July 2022

PO Box 106 607 Level 12, 21 Queen Street Auckland 1143, New Zealand

Phone: +64 9 300 6980

Email: enquiries@nzsuperfund.co.nz Website: www.nzsuperfund.nz

NZBN: 9429041903469



Dear

Official information request for information regarding Communications/Media

I refer to your official information request dated 7 June 2022 – as subsequently clarified on 14 June 2022 – to the Guardians of NZ Superannuation, making a series of 10 information requests relating to our Communications team in respect of each financial year: 2017, 2018, 2019, 2020, 2021 and for the partial year of 2022 to date.

Our response can be found at Appendix 1.

Note:

- answers are given as at 30 June for the applicable financial year.
- the growth in Communications team FTE since 2017 is broadly consistent with the overall strong growth of the Guardians' organisation over this period; furthermore, over the same period, funds under management have increased by more than \$20 billion. The Guardians' total headcount is currently approximately 200.
- we have defined contractors as independent/self-employed contractors, rather than secondees from professional service providers.
- further information on the Guardians' communications activity and resourcing (including fees paid
 to professional service providers) can be found in our Select Committee Annual Review
 disclosures, publicly available on the Parliamentary website. For the most recent disclosures
 please see: https://www.parliament.nz/en/pb/sc/submissions-and-advice/all?custom=FINS-116239.

By way of context, we also note that members of our communications team have roles which are broad and encompass more than attending to media queries/interviews (which appears to be the focus of your request). By way of example, our communications team is involved in our investment and asset management activity, stakeholder engagement including management of our relationship with Treasury and responsible Minister, and production of our annual report and other statutory reporting documents. The team coordinates the Guardians' responses to OIA requests and to parliamentary and Select Committee questions and reviews, and is also responsible for the Guardians' internal communications, intranet and websites, presentation & events programme and sponsorship portfolio.

We have withheld certain information on the basis that we have good reason for doing so under section 9 of the OIA. We considered whether the public interest in favour of disclosure outweighs our reasons for withholding such information and concluded that it does not. The core grounds we have relied upon, and a brief explanation of why they apply, are set out in Appendix I.

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.

Yours sincerely

Cristina Billett

GM Corporate Affairs

Appendix 1

Question	Answer							
	2017	2018	2019	2020	2021	2022		
Number of FTE communications/media staff employed in each year (this includes all internal and external communications staff/content producers and social media staff)	2.3	2.3	3.3	3.0	4.0	5.0		
2. The salary range paid to communications staff in each year (subsequently clarified to mean the range of salary actually paid in the relevant financial year from lowest to highest).	This information is withheld on the basis of: • section 9(2)(a) – "protect the privacy of natural persons" • section 9(2)(b(ii) – "commercial prejudice" • section 9(2)(i) – "commercial activities" Given the small size of our Communications team and the differentiated nature of the roles within it, we consider that to provide the requested salary range would compromise our staff members' privacy both in respect of their internal relationships and their external reputation, noting that our Communications employees are by the nature of their roles public-facing and readily identifiable. This particular request would require the disclosure of actual remuneration of identifiable persons. We make extensive disclosures in respect of remuneration in our Annual Reports and as part of our annual Select Committee review, including the number of employees remunerated in \$10,000 bands above \$100,000 and the processes for setting and benchmarking remuneration against market data. These disclosures provide context around the quantum of our organisational remuneration, and the practices and rigour which inform the determination of remuneration for particular roles and processes followed by our Board to ensure there is good administration and financial management.							

Question	Answer							
	2017	2018	2019	2020	2021	2022		
	respect of the NZ S In light of these p commercial activitie team but the Guard pools from which w maintaining the co administration of ou our employees' priv	Super Fund i.e. there privacy concerns we es by having a chilling dians as a whole (as re recruit are almost e ponfidentiality of this ar operations and the	is no allegation of imposition consider that release geffect on our efforts there would be a percentage of the percentag	ing this information value ing this information value to attract and retain beived risk of disclosurator organisations to waternally and externally linvestment activities	e is no particular ration increase the public into would prejudice our attop talent not just with the of salary information high the OIA does not atto the Guardians, is in investing the Fund, ue to attract the neces	erest in the matter. bility to undertake of in the Communication n), noting that the tale apply. We consider the vital to the effection addition to protection		
3. Number of communications/media contractors used in each year.	0	0	0	0	0	0		
Total sum paid to communications contractors in each year	0	0	0	0	0	0		
5. A breakdown of positions and numbers employed in each role (ie how many media advisors, senior media advisors, internal communications, managers, social media producers/managers)	1 x Head of Communications 1 x Communications Adviser 0.3 x Research Assistant	1 x Head of Communications 1 x Communications Adviser 0.3 x Research Assistant	1 x Head of Communications 1 x Senior Communications Strategist 1 x Communications Adviser 0.3 x Research Assistant	1 x Head of Communications 1 x Senior Communications Strategist 1 x Communications Adviser	1 x Head of Communications 1 x Senior Communications Strategist 1 x Senior Corporate Communications Adviser 1 x Senior Digital Communications Adviser	1 x Head of Communications 1 x Senior Communications Strategist 1 x Senior Corporate Communications Adviser 1 x Senior Digital Communications Adviser		

Question		Answer							
		2017	2018	2019	2020	2021	2022		
							1 x Communications Adviser		
6.	How many media queries received in each year	amount of wo register of su- would require 2021 the total would substa	ork that would be re- ch requests and do re- us to undertake time I number of media sto	quired to research and maintain a writter e-consuming researce ories covering Guard m's regular operation	nd collate the informa record of all verbal e h and collation for hig ians and its mandates s. We have considered	tion you have request nquiries, obtaining this hly imperfect results. N was approximately 2,7	on 18(f), due to the substantial ted. As we do not maintain a information from our records Noting that between 2017 and 700, providing this information could be framed in a way that		
7.	How many interview requests received in each year	Refused on the same grounds as request 6, set out above.							
8.	How many media interviews given, and to which media organisations and when	This request is refused on the basis of Section 18(e) in that the information is not held and/or section 18(f), due to the substantial amount of work that would be required to research and collate the information you have requested. As we do not maintain a register of such interviews, obtaining this information from our records would require us to undertake time-consuming research and collation for highly imperfect results. Noting that between 2017 and 2021 the total number of media stories covering the Guardians and its mandates was approximately 2,700, and that as part of this numerous interviews were undertaken by current and former staff members, collating this information would substantially impair our team's regular operations. We have considered whether this request could be framed in a way that would make it feasible for us to complete and concluded that it is not.							
	Total salary costs for communications staff each year	The total salary costs for communications staff for FY2022 up to 30 June 2022 was \$677,127. We have defined total salary costs as total actual salary costs paid for the FY2022 year, consistent with the treatment in our annual report (refer Consolida Statement of Comprehensive Revenue and Expense). Note: there were vacancies in the Communications team for periods FY2022. Had all roles been filled for the entire year total salary costs paid would naturally have been higher.							
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Question	Answer						
	2017	2018	2019	2020	2021	2022	
	Remuneration packages at the Guardians include, in addition to base salary payments, discretionary bonuses and as KiwiSaver contributions and insurances. At the time of writing no decisions on whether to pay bonuses for the have been made.						
10. In each year, how many communications staff paid a salary more than \$100,000 per annum			-			m, disclosing this information ormation disclosed under item	