



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](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cristina Billett', written in a cursive style.

**Cristina Billett**  
**GM Corporate Affairs**

**Appendix 1**

Question	Answer					
	2017	2018	2019	2020	2021	2022
1. 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).	<p>This information is withheld on the basis of:</p> <ul style="list-style-type: none"> <li>• section 9(2)(a) – “protect the privacy of natural persons”</li> <li>• section 9(2)(b)(ii) – “commercial prejudice”</li> <li>• section 9(2)(i) – “commercial activities”</li> </ul> <p>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.</p> <p>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.</p> <p>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.</p> <p>More granular information is not required for the purposes of transparency and accountability. There is no good reason why these individuals in particular should have their confidential salary data released and be subjected to potential public scrutiny. We note</p>					

Question	Answer					
	2017	2018	2019	2020	2021	2022
	<p>that your information request has been sent to a large number of agencies. There is no particular rationale for asking for it in respect of the NZ Super Fund i.e. there is no allegation of impropriety which would increase the public interest in the matter.</p> <p>In light of these privacy concerns we consider that releasing this information would prejudice our ability to undertake our commercial activities by having a chilling effect on our efforts to attract and retain top talent not just within the Communications team but the Guardians as a whole (as there would be a perceived risk of disclosure of salary information), noting that the talent pools from which we recruit are almost exclusively private sector organisations to which the OIA does not apply. We consider that maintaining the confidentiality of this information, both internally and externally to the Guardians, is vital to the effective administration of our operations and therefore our commercial investment activities in investing the Fund, in addition to protecting our employees' privacy. There is a strong public interest in ensuring we can continue to attract the necessary talent to invest the Fund on behalf of New Zealand taxpayers.</p>					
3. Number of communications/media contractors used in each year.	0	0	0	0	0	0
4. 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)	<p>1 x Head of Communications</p> <p>1 x Communications Adviser</p> <p>0.3 x Research Assistant</p>	<p>1 x Head of Communications</p> <p>1 x Communications Adviser</p> <p>0.3 x Research Assistant</p>	<p>1 x Head of Communications</p> <p>1 x Senior Communications Strategist</p> <p>1 x Communications Adviser</p> <p>0.3 x Research Assistant</p>	<p>1 x Head of Communications</p> <p>1 x Senior Communications Strategist</p> <p>1 x Communications Adviser</p>	<p>1 x Head of Communications</p> <p>1 x Senior Communications Strategist</p> <p>1 x Senior Corporate Communications Adviser</p> <p>1 x Senior Digital Communications Adviser</p>	<p>1 x Head of Communications</p> <p>1 x Senior Communications Strategist</p> <p>1 x Senior Corporate Communications Adviser</p> <p>1 x Senior Digital Communications Adviser</p>

Question	Answer					
	2017	2018	2019	2020	2021	2022
						1 x Communications Adviser
6. How many media queries received in each year	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 requests and do not maintain a written record of all verbal enquiries, 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 Guardians and its mandates was approximately 2,700, providing 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.					
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.					
9. Total salary costs for communications staff each year	<p>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 Consolidated Statement of Comprehensive Revenue and Expense). Note: there were vacancies in the Communications team for periods of FY2022. Had all roles been filled for the entire year total salary costs paid would naturally have been higher.</p> <p>For prior periods we refuse your request on the same grounds as request 2, as set out above. Given the small nature of the team in the relevant financial years, disclosing this information would allow the close approximation of actual salary for identifiable individuals.</p>					

Question	Answer					
	2017	2018	2019	2020	2021	2022
	Remuneration packages at the Guardians include, in addition to base salary payments, discretionary bonuses and benefits such as KiwiSaver contributions and insurances. At the time of writing no decisions on whether to pay bonuses for the FY2022 year have been made.					
10. In each year, how many communications staff paid a salary more than \$100,000 per annum and \$200,000 per annum	Withheld on the same grounds as request 2, as set out above. Given the small nature of the team, disclosing this information would allow the approximation of actual salary for identifiable individuals (in combination with the information disclosed under item 9).					