Collecting employee diversity information to advance workplace gender equality

A guide for employers

November 2025

Not all experiences of gender inequality at work are the same.
They are shaped by additional and intersecting demographic factors, such as Aboriginal and Torres Strait Islander status, cultural and linguistic diversity, and disability.

By collecting information on employee diversity, employers can more clearly see their progress towards gender equality. This guidance will support employers to collect this information and to consider gender equality from more than one angle. It will be helpful for business leaders, diversity and inclusion leaders and teams, human resources teams and data teams.

Contents

Introduction

The gender pay gap in Australia is slowly getting smaller. Progress in further reducing the gap is occurring partly because businesses, government and the community have committed to collecting and acting on information about gender equality at work. This has helped keep everyone responsible for continued progress. But not everyone is seeing the same improvements and opportunities: research shows that people from Anglo-Celtic backgrounds are benefiting more from the positive changes.[1]

Further progress towards gender equality in the workplace will take place if employers look at gender equality in different ways. They should think about how different parts of a person's identity – like their culture, language or disability – can lead to more than one kind of unfair treatment at work.[2]

WGEA developed this guidance in response to Recommendations 6 and 7.2 from the 2021 Review of the *Workplace Gender Equality Act 2012*. The review recommended that WGEA should lead research with relevant stakeholders to find the best way to collect information about diversity beyond gender. This includes information on Aboriginal and Torres Strait Islander background, cultural and linguistic diversity, and disability. Further, it recommended the collection of data on non-binary people, in line with the ABS Standard for Sex, Gender, Variations of Sex Characteristics and Sexual Orientation Variables. While this guidance responds to those recommendations, there is no requirement for employers to report this information to WGEA.

The importance of understanding workforce diversity

Collecting employee diversity information is the first step to understanding and making the most of a diverse workforce.[3]

 It also helps employers look more closely at how different groups experience gender inequality at work and find ways to work towards equality – and meets one of the guiding principles outlined in the Australian Government's *Working for Women: A Strategy for Gender Equality*, that 'efforts to drive gender equality must be inclusive and intersectional'.[4] Having accurate and useful information about employee diversity gives a clear picture of the workforce and helps employers make better decisions about future plans and actions.

How employers can use this guidance to measure the diversity of their workforce

The guidance is based on four principles for collecting employee information:

- employer accountability
- privacy
- inclusion and cultural safety
- employee agency.

It outlines supports for each principle and suggests practical steps employers can take to put the principle into action. These are included in each section as 'key enablers' and 'recommended practice'.

For employers just getting started with data collection, this guidance explains the early steps to take so it is done properly and respectfully. For employers with experience, it offers ways to improve their approach. All employers should also make sure to follow relevant laws and compliance requirements.

WGEA understands that not all employers will be able to follow every recommended practice in this guidance. Each employer should decide what is realistic and suitable for their own situation.

WGEA consulted representative peak organisations, relevant public sector organisations and employers in creating this guidance. It provides:

- principles to underpin employee diversity data collection
- practical considerations for data collection and reporting
- example questions for collecting employee diversity information (Appendix A)
- an employee diversity data collection checklist (Appendix B).

Principles for collecting employee diversity information

This guidance sets out four core principles to support ethical, effective data collection that contributes to building and sustaining a diverse, equitable and inclusive workplace.

The guidance also outlines practical enablers for each of the four core principles – tools and actions employers can use to embed these principles into their systems and processes. It also recommends good practices that employers can follow.

Approaches to data collection

Employee diversity information can be gathered in various ways and at different points in the employee lifecycle – for example, during recruitment, induction and onboarding, and through regular employee experience or engagement surveys.

This guidance doesn't tell employers exactly how to collect data. Instead, it encourages them to use a clear and consistent approach. This means collecting data regularly, like during onboarding and in yearly employee surveys, so the information stays up to date and reflects how employees' identities and experiences may change over time.

Principle 1: Employer accountability

By taking responsibility for collecting diversity data, employers can understand the different ways gender inequality shows up in the workplace. Being accountable builds trust, improves the employer's reputation, and can attract talented people and customers who care about fairness and inclusion.

Accountability also helps organisations measure how well they're doing on gender equality, diversity and inclusion. Once diversity data is collected, employers can show they're serious about fairness by looking for gaps or inequalities, such as differences in pay, promotions or opportunities – particularly where gender and other diversity factors overlap. Acting on this data can also help create a workplace where people feel culturally safe[1] (this is covered further in 'Principle 3: Inclusion and cultural safety').

Employers have a duty to their employees, customers, shareholders and the wider community to support gender equality and inclusion. Collecting diversity information shows their commitment to accountability. It helps people outside the organisation see

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1   Cultural safety, as defined by the Jumbunna Institute, means 'being able to practise your culture free of ridicule or condemnation. It occurs when a workplace acknowledges, respects and accommodates difference.' See *Gari Yala (Speak the Truth): Centreing the work experiences of Aboriginal and/or Torres Strait Islander Australians*

what the employer is doing to support diversity and tackle inequality.

Protecting employees' privacy is also a key part of being accountable. See 'Principle 2: Privacy' for more on this.

Key enabler: Clearly communicated purpose for collecting information

Clear communication about how diversity information will be used is essential to ease concerns employees may have about sharing it.

Employers should explain – before collecting any information, during the collection process, and after it – that the information won't be used in a way that could identify individuals. They should also make it clear how the information will help guide decisions and improve workplace policies.

Key enabler: Commitment to taking action based on information provided

Before asking employees to share diversity information, employers should clearly explain what they plan to do with it, as well as how privacy will be protected.

This helps employees understand the value of sharing their information. The actions employers might take after collecting the information could include improving recruitment processes, boosting employee engagement, or offering better employee supports.

Recommended practice

- Involve employees early when planning how diversity information will be collected. Employees will want to understand how their information will be used before sharing it, while employers need the information to take meaningful action. Early consultation helps build trust and encourages participation.
- Explain the purpose clearly when talking to employees about diversity data collection. Give enough background to help them feel comfortable taking part, but avoid making it seem like they're being pressured.
- Make privacy information, such as who can access the data and what it will be used for, easy to find. This helps reassure employees that their information is being handled responsibly.
- Show leadership commitment and accountability by sharing the results of diversity data collection with boards and executives, while still respecting privacy rules.

Principle 2: Privacy

Employers need to understand and meet privacy obligations when collecting, using and disclosing information about their employees. This is especially important because gender and diversity information relating to identified, or reasonably identifiable, individuals is considered personal (and in some cases sensitive) information.

To protect employee privacy, employers should:

- set up clear processes and systems for collecting, analysing and using this data
- make sure, when the information is provided anonymously, it cannot be linked back to any individual.

Most Australian Government agencies, private sector employers with an annual turnover of more than $3 million, and private sector health service providers are subject to the *Privacy Act 1988* and the 13 Australian Privacy Principles included in the Act. These principles regulate the handling of personal and sensitive information for entities covered by the Act. They also offer useful guidance for organisations not legally bound by the

Act. The principles highlight that misusing personal and sensitive information can harm individuals, including through discrimination, so it must be handled with extra care.[5]

Privacy is especially important when collecting employee diversity information,[6] even if it is anonymous. During consultations, stakeholders told WGEA that privacy concerns can stop employees from sharing this information due to fears of discrimination, bias or racism, and the emotional impact that can follow.

These concerns are often stronger in smaller organisations or among employees from smaller demographic groups, where even anonymous information might still reveal someone's identity and make them vulnerable depending on who sees the information.[7]

Employee records exemption: Private sector employers

Private sector employers do not have to follow the Privacy Act when they use employee records (personal information about a person's job) for something directly related to their current or past employment. However, not all information collected about an employee automatically counts as an 'employee record' under the Privacy Act — it depends on the situation.[2]

Even if the exemption applies, employers should still be careful when collecting and using diversity-related information, because of its sensitive nature. They also need to make sure they follow any other workplace laws that apply to employee information.

Key enabler: Transparency and communication

To help ease privacy concerns around collecting and using employee diversity information, employers should be open and clear about:

- how the information is being collected
- why the information is being collected
- how the information will be used
- how the information will be managed and stored
- who has access to the information
- whether the information is anonymous and/or confidential (see note)[3]
- employees' right to access the record of their information, and to correct or remove it.

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2   Privacy guidance on **employee records** and the **employee records exemption** is published on the Office of the Australian Information Commissioner's website. Employers should obtain their own legal advice about the application of the employee records exemption to their handling of employee information.
3   Note that the concept of 'confidentiality' is distinct from that of 'privacy'. However, the definition of confidentiality provided in the note on confidentiality and anonymity does cover personal information.

A note on confidentiality and anonymity

Confidentiality in data collection means keeping information private throughout the whole process – when it is collected, when it is analysed and when it is stored.

Employers need to understand the difference between 'anonymous' and 'confidential' data collection, and to explain this clearly when communicating with employees:

- 'Anonymous' means a person provides information without identifying themselves. No personally identifying details are collected, so the information should not be able to identify or be linked back to any specific individual.
- 'Confidential' means the information can be linked to a person, but only by certain people or teams.

This distinction is especially important when collecting and reporting on employee diversity information. If only a few people share a particular diversity characteristic, there is a risk they could be identified – even if the information was collected anonymously (like in an employee survey). In these cases, employers may need to suppress the data or use it carefully to avoid accidentally revealing someone's identity.

Employers can build trust and openness by using clear policies, processes and communication. Regular updates help reassure employees and address concerns, especially around privacy. These can include:

- sending policies and updates by email
- sharing information on internal systems or intranet pages
- including key messages in internal newsletters or bulletins.

Key enabler: Secure data storage and handling practices

Employers told WGEA one of the biggest challenges in collecting diversity information is having secure storage capability and processes in place. Employees want to know their personal information is safe, kept private and used appropriately.[8]

While WGEA does not give specific advice on how secure systems should be – as this depends on an employer's size and the type of data it collects – all employers are responsible for making sure employees understand how their information is stored and handled. Employers can explain this through a policy, guidance document or other materials, ideally developed with input from employees.

Recommended practice

- Follow all privacy laws and explain how data will be de-identified or suppressed if only a few people respond.[9]
- Train HR and other relevant role-holders so they understand privacy rules and feel confident handling diversity information.[4]
- Clearly explain to employees – before collecting any information – how their information will be kept confidential,[10] why it is being collected, and how it will be used,[11] in line with federal and state/territory privacy laws.

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4   In addition to ensuring all necessary privacy considerations are addressed, improving the confidence of HR teams in collecting and handling diversity information can help to secure senior leadership support for data collection. See Diversity Council Australia (2025), *D&I data at work: Collecting and reporting on diversity data*.

- Be thoughtful about how information is shared, especially when it comes from small or underrepresented groups, to avoid unintentionally identifying individuals.[12]

Principle 3: Inclusion and cultural safety

Employers need to create a workplace culture where everyone feels included, respected and safe. Trust is key to building this kind of environment.

Some people may feel uncomfortable or worried when asked about their gender identity, cultural background or disability status.[13] They might fear being treated unfairly or judged based on their answers. Other factors, like concerns about how this might affect their career or a general lack of understanding by employers, can also make people hesitant to share personal information.[14]

Certain groups may also be cautious about how their information is collected and used, especially if past experiences have been harmful. For example, Aboriginal and Torres Strait Islander people have faced harmful data practices in the past, where information was used to support assimilationist racial classification, displacement and removal of children. These practices were often used by people in power, including in workplaces. Because of this history, many Aboriginal and Torres Strait Islander people may still feel unsafe identifying themselves at work.

Indigenous data governance

During consultation, Aboriginal and Torres Strait Islander stakeholders highlighted the importance of data sovereignty for their communities. This means having control over the information that relates to their culture and people – including the right to own, create and manage it – and for any data collected to reflect what matters to them.[15,16]

To support this, the National Indigenous Australians Agency (NIAA) has created a framework for how government organisations should manage Indigenous data. Their guidance focuses on practical steps organisations can take to respect data sovereignty, including by engaging and consulting meaningfully with Indigenous communities. Private sector employers can look to reflect these considerations in their data collection practices.[17]

Key enabler: Employee consultation and feedback

Employers need to make sure all employees feel safe, included and respected at work. One way to do this is by actively involving employees in workplace decisions.

When it comes to collecting information about employee diversity, employers should talk with employees to help shape how this is done. This could include working with diversity and inclusion teams or employee groups, or running employee surveys (which can also be anonymous).

By genuinely involving employees in the process, employers are more likely to design data collection methods that people trust and feel comfortable with. As a result, the information collected will be more accurate and give a clearer picture of the diversity within the workforce.

Key enabler: Inclusive language

Language plays an important role in creating an inclusive workplace. WGEA recognises that language, especially around diversity and identity, changes over time as social values and expectations shift. This can make it challenging for employers to choose the right

words when collecting diversity information.[18]

For example, there is ongoing debate about how best to describe people from culturally diverse backgrounds. Some prefer the term 'culturally and racially marginalised'[19] over 'cultural and linguistic diversity'. Employers should keep talking with their employees to make sure the language they use is respectful, inclusive and appropriate.

Table 1 provides guidance on language for different diversity characteristics. Employers can use this to help shape things like policies, training materials and surveys. WGEA developed this guidance in consultation with experts and people with lived experience. Because language continues to evolve, future updates to the guidance will reflect any changes in best practice.

Figure 1: Language considerations for diversity characteristics

Characteristic	Considerations
Aboriginal and Torres Strait Islander status	Many Aboriginal and Torres Strait Islander people prefer to identify by their specific Nation or language group. When that is not possible, using 'Aboriginal and Torres Strait Islander peoples' is generally considered best practice, as it recognises the diversity of cultures and identities across Australia.[20] To show respect, always capitalise terms like 'Aboriginal and Torres Strait Islander', 'Elders', and 'Traditional Owners' or 'Custodians'.[21] Avoid using acronyms like 'ATSI', which are considered disrespectful. Also, while the term 'Indigenous' is commonly used, some people find it inappropriate or offensive because it can feel too general and overlook the distinct identities of Aboriginal and Torres Strait Islander peoples.[22]
Cultural and linguistic diversity	The words used to describe people from racial, ethnic or religious minority groups aren't consistent in Australia or around the world. In Australia, the most commonly used term is 'culturally and linguistically diverse'. However, stakeholders consulted in developing this guidance emphasised the need to recognise that this term doesn't include race as an important part of diversity.[23] The current approach adopted by the ABS understands cultural and linguistic diversity to include cultural background, ethnic group, language and country of birth.[5]

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5   WGEA notes that there are issues with certain methods of the ABS Standards. While the goal of this guidance is to encourage employers to take an approach to data collection consistent with national methods, providing context is also important, and researchers argue that the methods outlined in the ABS Standards for Statistics on Cultural and Language Diversity rely on 'collective cultural groupings' that function to erase visibility of specific groups. Additionally, they suggest that the failure of the Australian Census to 'recognise the way cultural identity is performed' means that national data cannot 'reflect contemporary ethnic identity'. See 'The lack of race and ethnicity data in Australia—A threat to achieving health equity' and 'Promoting representation through data: The case for more comprehensive ethnicity data in Australia'.

Characteristic	Considerations
Disability	When describing disability, employers should use language that reflects the social model of disability, which sees disability as the result of barriers in the environment – such as inaccessible buildings or negative attitudes – rather than a person's medical condition.[24,25] For example, it is not the inability to walk that prevents someone from entering a building independently, but the presence of stairs without an accessible alternative. [26,27] Employers should also consider the human rights model, which recognises disability as part of human diversity and highlights the need for fair support.[28] In Australia, both person-first (e.g. 'people with disability') and identity-first (e.g. 'disabled people') language is used.[29] While people with disability often have their own preference for either term, 'people with disability' can be more neutral.[30] Use 'disability' as an uncountable noun: say 'people with disability', not 'people with disabilities'.[31] Some terms used to describe disability are outdated or offensive. People with Disability Australia has a guide on inclusive language and respectful alternatives. Disability is understood differently across cultures, and in some cultures, the concept may not exist at all. This can affect whether people seek support.[32] (Note: when asking employees about disability, WGEA recommends using the legal definition from the *Disability Discrimination Act 1992*. See Appendix A.)
Gender	Gender is about the social and cultural aspects of who someone is, how they feel, and how they express themselves. It is different from sex, which refers to physical characteristics like reproductive organs. While people often use the words 'gender' and 'sex' as if they mean the same thing, they describe different things.[33] Employers can follow the relevant ABS Standard when asking employees to describe their gender. This means providing response options 'man or male', 'woman or female', 'non-binary', 'I use a different term (please specify)' and 'Prefer not to say'.[34]

Recommended practice

- Use existing workplace policies – like those about diversity, inclusion, and preventing harassment or bullying – to help guide how information is collected.
- Regularly check in with diversity and inclusion teams and other relevant people to make sure the language and approach used are respectful, up to date, and inclusive.

Principle 4: Employee agency

Employers should focus on the needs of employees when asking them to share personal information about their background. This helps make sure the process is respectful, useful and fair. To help employees decide whether or not to share their information, employers should be ready to explain how sharing could benefit the employee and how they'll be involved in decisions about how it is used. To support employees' choice and control, employers should use words like 'sharing' or 'identifying' instead of 'disclosing', and be clear about who owns the information. This is especially important when collecting information from Aboriginal and Torres Strait Islander employees.

Key enabler: Employee-centred data collection

Every piece of diversity information represents a real person.[35] Employees should be able to choose whether to share personal details and how they identify. For accurate and consistent information, people should always have the option not to answer, either by selecting something like 'Prefer not to say' (see **Appendix A** for examples) or by the question being optional. While some employers told WGEA that voluntary data collection can lead to missing information, many still recommended keeping it voluntary so employees have control over what they share and when.

Key enabler: Two-way communication

Employers should give employees a chance to share feedback and talk about issues relevant to diversity data collection. This feedback can be about how information is collected or about broader policies and practices. Two-way communication helps build trust and keeps people engaged, while also giving employers a way to listen, fix problems, and make improvements as needed. Examples of two-way communication include employee advisory groups, diversity and inclusion committees or networks, dedicated contact people, and open feedback channels managed by HR or a nominated manager.

Recommended practice

- Make sure data collection questions include options for alternative responses and allow employees to choose not to share information (see **Appendix A**).
- Set up ways for employers and employees to communicate with each other, if these do not already exist.
- Test the data collection process with a small group of employees to confirm that the request does not feel overwhelming; that the purpose of collecting the information is clearly explained; that the questions are suitable and relevant; and that the communication methods work well.

Additional relevant resources

Diversity Council Australia	Diversity Council Australia (DCA) is an independent, not-for-profit organisation that promotes diversity and inclusion in Australian workplaces. DCA offers a wide range of online resources and research for both members and non-members. Members can access practical, evidence-based advice on how to improve diversity and inclusion in their organisations, including how to collect employee diversity information. More information is available at **https://www.dca.org.au/**
business.gov.au	This whole-of-government website provides guidance to the Australian business community on equal opportunity employment, setting up flexible working arrangements, and hiring employees from diverse backgrounds. More information is available at **https://business.gov.au/**
Australian Human Rights Commission	The Australian Human Rights Commission promotes human rights across Australia. It offers toolkits, guidelines and other resources to help workplaces become more diverse and inclusive. These resources are available at **https://humanrights.gov.au/our-work/employers/toolkits-guidelines-and-other-resources**
The Alliance	The National Indigenous Employment and Training Alliance is an Indigenous-led national organisation. It works to close the gap in employment and training for Aboriginal and Torres Strait Islander peoples. The Alliance publishes the First Nations Employment Index, which tracks employment trends and highlights challenges and opportunities for employers to support meaningful work for First Nations people. The Index can be found at **https://nieta.org.au/**
Equality Australia	Equality Australia is a national organisation dedicated to equality for LGBTIQ+ people. Its website publishes reports, fact sheets, explainers and other resources on LGBTIQ+ equality. These can be found at **https://equalityaustralia.org.au/resources/**
People with Disability Australia	People with Disability Australia (PWDA) is a national organisation, led by people with disability, that advocates for the rights of people with disability. PWDA's website provides resources exploring what disability is, what language to use when discussing it and how to connect with PWDA. These resources can be found at **https://pwd.org.au/resources/**
Commission for Gender Equality in the Public Sector (Victoria)	The Commission for Gender Equality in the Public Sector works to improve gender equality in the Victorian public sector and the wider community. Its website shares research on how workplaces can achieve gender equality and the experiences of different groups of employees. This research can be found at **https://www.genderequalitycommission.vic.gov.au/research**

Appendix A: Sample demographic questions

The examples below show questions employers can use to collect employee diversity information. These questions were developed in consultation with peak bodies and employers, and are based on current research. In many cases, the sample questions use wording that aligns with current national data collections, including those of the ABS.

Employers should consult with their organisation's diversity groups prior to any data collection, and explain clearly what they plan to do with the information before collecting it. This helps employees understand the purpose of collection and see the benefits. Employers must also follow all relevant privacy laws and obligations when using the data.

Aboriginal and Torres Strait Islander peoples

> ### Note for employers
>
> Some people group Aboriginal and Torres Strait Islander peoples under the term 'cultural and linguistic diversity'.[36] Employers should avoid this when collecting workforce data, because Aboriginal and Torres Strait Islander peoples have distinct cultures and experiences.[37,38]
>
> Depending on the organisation, it may be more appropriate to include a list of nations and language groups instead of the example below. However, employers should speak with relevant groups and organisations before making any changes.

1. Do you identify as an Aboriginal and/or Torres Strait Islander person?
   (Please select only one option)
   - ☐ No
   - ☐ Yes, Aboriginal
   - ☐ Yes, Torres Strait Islander
   - ☐ Yes, both Aboriginal and Torres Strait Islander
   - ☐ Unsure
   - ☐ Prefer not to say

Cultural and linguistic diversity

Note: The ABS Standards for Statistics on Cultural and Linguistic Diversity contain cultural and ethnic groups, languages and countries that can be used in asking employees questions related to cultural and linguistic diversity. WGEA recommends using the lists of cultural and ethnic groups, languages and countries contained in the linked ABS classifications below.

2. How would you describe your cultural background?
   You may select multiple cultural and ethnic backgrounds)
   - ☐ *[Instruct respondents to select cultural and ethnic background(s) from the ABS Standard Classification of Cultural and Ethnic Groups]*
   - ☐ Other ethnicity not listed, please specify: _____
   - ☐ Unsure
   - ☐ Prefer not to say

3. Could you have a conversation about a lot of everyday things and/or read everyday materials in a language apart from English?

    ☐ No – English only

    ☐ Yes – *[specify language(s) from ABS Standard Classification of Languages]*

    ☐ Yes – other language, please specify: _____

    ☐ Prefer not to say

4. Which country were you born in?

    ☐ *[Instruct respondents to select country from the ABS Standard Australian Classification of Countries]*

    ☐ Other country not listed, please specify: _____

    ☐ Unsure

    ☐ Prefer not to say

Disability

The *Disability Discrimination Act 1992* (Cth) defines disability as follows:

disability, in relation to a person, means:

  a. total or partial loss of the person's bodily or mental functions; or

  b. total or partial loss of a part of the body; or

  c. the presence in the body of organisms causing disease or illness; or

  d. the presence in the body of organisms capable of causing disease or illness; or

  e. the malfunction, malformation or disfigurement of a part of the person's body; or

  f. a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or

  g. a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour;

and includes a disability that:

  h. presently exists; or

  i. previously existed but no longer exists; or

  j. may exist in the future (including because of a genetic predisposition to that disability); or

  k. is imputed to a person.

To avoid doubt, a ***disability*** that is otherwise covered by this definition includes behaviour that is a symptom or manifestation of the disability.

Note: Like other definitions used in the collection of disability data, the definition outlined by the *Disability Discrimination Act 1992* does not fit within the social model of disability. Instead, it provides a legal basis for people to identify as having disability. As mentioned in Table 1, the social model of disability sees society as disabling, with disability resulting from interactions between people living with impairments and environmental barriers.

5. Are you/do you identify as a person with disability? *See definition of disability above.*

☐ Yes

☐ No

☐ Prefer not to say

Gender

6. What is your gender?

☐ Woman or female

☐ Man or male

☐ Non-binary

☐ I use a different term (please specify) _____

☐ Prefer not to say

Appendix B: Employee diversity data collection checklist

This checklist helps employers make sure that diversity data collection reflects both employer accountability and employee agency. Before using the checklist, employers should follow the recommended practices to make sure privacy is protected and to create an inclusive and culturally safe environment.

WGEA recognises that some employers may not have the resources to complete every step in the checklist and provides it as an example of better practice.

1. **Review or choose how to collect employee diversity information**, making sure the approach follows privacy laws and responsibilities. Create a plan that explains:
    - why the information is being collected and how it will be used
    - how the information will be stored and managed
    - who will have access to the information.
2. **Talk with employees** about the proposed plan. Ask for feedback on the method, wording and purpose of the data collection.
3. **Test the data collection method** with a small group of employees before using it across the whole organisation.
4. **Roll out the chosen data collection method** across the organisation.
5. **Ask employees for feedback** on the process and method used.
6. **Use the feedback** to improve future data collection.

Appendix C: Methodology

Between July 2023 and June 2025, WGEA consulted a wide range of employers, industry groups, peak bodies, advocates and expert advisers to help develop this guidance.

Consultation included:

- a survey of 53 selected private sector employers about their experiences collecting employee diversity information[6]
- 9 roundtables with peak bodies, employers, government and education representatives, and other organisations and advocates[7]
- 5 interviews with representative peak organisations
- input from WGEA's Employer Reference Group.

Three public sector agencies also provided written feedback on the draft guidance.

To support these findings, WGEA carried out a desktop review of how organisations and agencies in Australia and overseas collect diversity information.

Note of thanks

WGEA thanks all employers, industry groups, peak bodies, advocates, and expert advisers who took part and shared their insights. Their valuable experiences and reflections on what works well – and what needs improvement – helped shape this guidance.

WGEA is also very grateful to Natasha de Silva and Maria Twomey, of **Intersection**, for their work in developing the foundations of this guidance.

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6   All of the selected employers had a legal obligation to report to WGEA on gender equality indicators.
7   WGEA held 9 roundtables. These included 2 employer roundtables, an employee organisation roundtable, a cultural and linguistic diversity roundtable, a public sector agencies roundtable, a disability sector roundtable, a non-binary roundtable, a peak bodies roundtable, and an Aboriginal and Torres Strait Islander roundtable.

Endnotes

1 Intersection & Chief Executive Women, (2023), *Unlocking leadership: Conversations on gender and race in corporate Australia*, CEW.

2 Intersection & Chief Executive Women, (2023), *Unlocking leadership*.

3 PwC, (n.d.), Diversity data collection.

4 Commonwealth of Australia, Department of the Prime Minister and Cabinet, (2024), *Working for women: A strategy for gender equality*. PM&C.

5 Australian Government, Office of the Australian Information Commissioner, (2022), *Australian Privacy Principles guidelines*, OAIC.

6 Commonwealth of Australia, Department of the Prime Minister and Cabinet. (2021). *WGEA Review Report. Review of the Workplace Gender Equality Act 2012*, PM&C.

7 Diversity Council Australia, (2022), *D&I 101 - Collecting Diversity Data*.

8 Fair Work Ombudsman, (n.d.), *Workplace privacy*, FWO.

9 Diversity Council Australia, (2022), *D&I 101 - Collecting Diversity Data*.

10 Diversity Council Australia, (2022), *D&I 101 - Collecting Diversity Data*.

11 Australian Government, Office of the Australian Information Commissioner, (2022), *Australian Privacy Principles guidelines*, OAIC.

12 Diversity Council Australia, (2022), *D&I 101 - Collecting Diversity Data*.

13 Diversity Council Australia, (2022), *D&I 101 - Collecting Diversity Data*.

14 Diversity Council Australia & Australian Disability Network, (2024), *Inclusion@Work Index: Disability data at work – How organisations can capture disability data safely and respectfully*, DCA/ADN.

15 Snipp, C. M., (2016), What does data sovereignty imply: What does it look like?, in T. Kukutai and J. Taylor (eds.), *Indigenous data sovereignty: Toward an agenda* (2016), ANU Press.

16 Australian Indigenous Governance Institute & Maiam nayri Wingara, (2018, June 30), *Indigenous data sovereignty* [Communique].

17 Australian Human Rights Commission, *Measuring What Matters: Submission to the Australian Government Treasury Department* (Report, January 2023) 12.

18 Diversity Council Australia & University of Sydney Business School, (2021), *Counting culture: Towards a standardised approach to measuring and reporting on workforce cultural diversity in Australia*, DCA.

19 Diversity Council Australia (n.d.), *A note on language: Culturally and racially marginalised women at work*, DCA.

20 Reconciliation Australia, (2021), *RAP drafting resource: Demonstrating inclusive and respectful language*. Reconciliation Australia.

21 Reconciliation Australia, (2021), *RAP drafting resource*.

22 Commonwealth of Australia. (2025). Aboriginal and Torres Strait Islander peoples. *Australian Government Digital Style Manual*. Commonwealth of Australia. See also Reconciliation Australia, (2021), *RAP drafting resource*; Diversity Council of Australia & Jumbunna Institute, (2020), *Gari Yala (Speak the Truth)*: Synopsis report. Diversity Council Australia/Jumbunna Institute.

23 Diversity Council Australia, (2023), *Culturally and racially marginalised women in leadership: a framework for intersectional organisational action*, DCA.

24 People with Disability Australia, (n.d.,) *Social model of disability*, PWDA.

25 People with Disability Australia, (n. d.), *Social model of disability*, PWDA.

26 Australian Federation of Disability Organisations, (n.d.),Social model of disability, AFDO.

27 People with Disability Australia, (n. d.), *Social model of disability*, PWDA.

28 People with Disability Australia, (2021), *PWDA language guide: A guide to language about disability*, p. 5, PWDA.

29 People with Disability Australia, (2021), *PWDA language guide: A guide to language about disability*, p. 6, PWDA.

30 People with Disability Australia, (2021), *PWDA language guide: A guide to language about disability*, p. 6, PWDA.

31 People with Disability Australia, (2021), *PWDA language guide: A guide to language about disability*, p. 11, PWDA.

32 People with Disability Australia, National Ethnic Disability Alliance, and Federation of Ethnic Communities' Councils Australia (2021), *The experiences and perspectives of people with disability from culturally and linguistically diverse backgrounds,* [Submission to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability], PWDA.

33 Australian Bureau of Statistics (2021), Standard for Sex, Gender, Variations of Sex Characteristics and Sexual Orientation Variables: *Gender* ABS.

34 Australian Bureau of Statistics (2021), Standard for Sex, Gender, Variations of Sex Characteristics and Sexual Orientation Variables: *Gender* ABS.

35 Diversity Council Australia. (2025). *D&I Data at Work: Collecting and reporting on diversity data*

36 Australian Bureau of Statistics (2022), *Standards for Statistics on Cultural and Language Diversity*, ABS.

37 Thi Thu Le Pham et al, 'Definitions of Culturally and Linguistically Diverse (CALD): A Literature Review of Epidemiological Research in Australia,' (2021) 18(2) *International Journal of Environmental Research and Public Health* 737: 1-23, 14.

38 Diversity Council Australia (2022), *D&I 101: Collecting Diversity Data*, p. 19, DCA.

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