

Gender and ethnic pay gap action plan 2025

August 2025



Te Kāwanatanga o Aotearoa
New Zealand Government

WORKSAFE
Mahi Haumarū Aotearoa

About this report

This document outlines our action plan to close the gender and ethnic pay gap at WorkSafe New Zealand. It supports our ambition to have a culture that is values driven, embraces diversity and inclusion, and creates a work environment where our people care about each other and thrive.

CONTENTS

1.0	Introduction	1
2.0	Progress to date	3
2.1	Transparency	4
2.2	Equitable pay outcomes	4
2.3	Leadership and representation	4
2.4	Effective career and leadership development	4
2.5	Eliminating all forms of bias and discrimination	6
2.6	Flexible work by default	6
3.0	WorkSafe's diversity, equity and inclusion approach	6
4.0	Gaining insights to better understand the drivers behind our gender and ethnic pay gap	9
4.1	Engaging with our kaimahi	10
4.2	Aotearoa Inclusivity Matrix – Diversity Works	10
4.3	Accessibility tick and DEI plan refresh	10
5.0	Action plan	11

6.0 Measure and analyse gender and ethnic pay gap 14

6.1	Workforce representation – what the data tells us	15
6.2	Gender pay gap	16
6.3	Gender and ethnic pay gap	16
6.4	Gender distribution in more detail	17
6.5	Pay gap analysis in more detail	18

tables

1	Action plan	12
2	Workforce data	15
3	Gender pay gaps (mean and median)	16
4	Gender and ethnic pay gaps with WorkSafe, New Zealand Public Service 2024, and New Zealand 2024 comparisons	16

figures

1	Gender distribution by band	17
2	Average full-time equivalent salary by gender by band	18

1.0

Introduction

The Kia Toipoto Public Service pay gap action plan (2021–24) sets out clear steps to:

- make real progress on closing pay gaps for women, Māori, Pacific peoples, and ethnic communities
- speed up improvements for Māori women, Pacific women, and women from ethnic backgrounds
- build fairer workplaces for everyone, including people with disabilities and rainbow community members.

Government departments and Crown organisations will:

- release their pay gap information in yearly action plans
- make sure bias doesn't affect starting pay or wages for staff doing the same or similar work
- create plans to get better representation of women and ethnic groups in their teams and leadership
- set up fair career paths and chances to move up
- stop bias and discrimination in HR and pay policies
- build understanding of different cultures
- make flexible working normal.

Kia Toipoto's goals match up with what the Public Service Association (PSA) is working on:

- building skills and experience through learning and other opportunities
- getting fair pay in secure jobs where changes benefit everyone
- embracing workplace diversity so we can all do well.

Kia Toipoto is part of our work programme. In 2022, we created our diversity, equity and inclusion (DEI) approach. Work is underway to refresh our DEI work plan this year.

2.0

Progress to date

- 2.1 Transparency
- 2.2 Equitable pay outcomes
- 2.3 Leadership and representation
- 2.4 Effective career and leadership development
- 2.5 Eliminating all forms of bias and discrimination
- 2.6 Flexible work by default

Our achievements to date are:

2.1 Transparency

- We worked with our staff, employee-led networks, unions and other partners to create our action plan.
- All our HR and pay policies, including salary ranges, are available on our staff website.
- Staff can see their own pay information, including their salary band and where they sit in the range, through our HR system.

2.2 Equitable pay outcomes

- We designed and rolled out a new step-based pay system, with guidance for managers on how to use it.
- We reviewed salaries for Māori staff in band 17.
- We've started checking job descriptions to make sure roles are described accurately and sized correctly compared to similar jobs.
- We created a report to keep track of starting salaries and pay for the same or similar roles.
- We put new processes in place during hiring to make sure starting pay and pay for similar roles is fair and doesn't add to gender and ethnic pay gaps.

2.3 Leadership and representation

- We developed our diversity, equity and inclusion action plan and are working through it.
- We've designed our leadership capabilities and learning programme. We worked with internal teams to make sure Māori worldview is woven through our leadership programme and expectations.
- We took part in and sponsored the Tū Mau Mana Moana Programme for Pacific leaders.
- We've built strong partnerships outside the organisation and expanded our networks to create opportunities for groups that haven't been well represented through graduate and mentoring programmes.

2.4 Effective career and leadership development

- We have study leave to support career development.
- We have initiated comprehensive inspectorate workforce planning, which includes reviewing and enhancing our inspector development pathways through a dedicated action plan.
- We have started a project to look at what skills and capabilities our organisation needs now and in the future, and how we can help our people develop them.

2.5 Eliminating all forms of bias and discrimination

- We rolled out unconscious bias and diversity training for recruitment. All People and Culture team members and hiring managers involved in recent organisational changes completed this training.
- We launched the Mana Āki cultural competence online learning programme.
- We keep building our team and individual knowledge of the Māori-Crown relationship through our Te Puāwaitanga programme. This programme is a big part of lifting WorkSafe's overall understanding of te ao Māori.
- We provide up to 30 days of paid leave for primary carers returning to work within 12 months.

2.6 Flexible work by default

- We designed, launched and embedded our flexible working policy, following guidance from Te Kawa Mataaho.
- We promote flexible working on our careers page and, where possible, advertise roles as flexible. We support leaders to stay committed to flexibility through recruitment, starting work, and beyond.
- How we work (environment and behaviours) was a key focus in our recent building moves.

This document provides an overview of the current actions underway, and the steps we are taking to ensure we take an insights driven approach to the development of our action plan.

3.0

WorkSafe's diversity,
equity and inclusion
approach

Our diversity, equity and inclusion approach was finalised in October 2022 and has been well received by our kaimahi (staff).

We have four key diversity, equity and inclusion objectives:

- Inclusion metric that by 2025, 97% of our kaimahi will feel they are included, respected and valued at WorkSafe. This is measured through our quarterly *We Say* employee engagement survey.
- Gender and ethnic pay gap – develop a work plan annually to deliver on the goals of Kia Toipoto.
- Te ao Māori – increase the number of Māori kaimahi at WorkSafe by 2025, to reflect our communities.
- Leadership composition – WorkSafe's leadership will culturally and ethnically represent the population of Aotearoa by 2025.

We will develop our new DEI approach this year to show how we'll make progress towards these goals.

Our ambition is to create a culture that is values driven, embraces diversity and inclusion, and creates a mentally healthy work environment where our people care about each other and thrive.

We will be a leader in health, safety and wellbeing and an organisation that values diversity and addresses equity, so everyone is valued, included, and can belong at WorkSafe. We know everyone is different, so we want to create a culture where people can bring their whole selves to work. This means creating space for all identities both seen and unseen, including but not limited to: neurodiversity, ability, ethnicity, culture, gender identity, LGBTQIA+, age, and faith.

Embracing the richness diversity and inclusion brings, aligns with who we want to be as an organisation as well as the WorkSafe values and our key strategies.

We acknowledge the ongoing inequity that exists in our communities and recognise the work we have to do to address the impact of exclusion and colonisation.

We recognise that work in this space does not have an end date, yet is an ongoing journey of progress.

WorkSafe's diversity, equity and inclusion (DEI) approach



We'll embed change through

- **Leadership:** We'll continue to build leadership capability aligned to our values and behaviours
- **Culture and values:** How we treat each other, live our purpose and how the mātaḡono to guide our behaviour
- **Strategy and policy:** Bringing our values to life through our policies, processes and ways of working
- **Employee engagement:** Having strong worker engagement (including HSRs, unions and network groups) and creating a workplace where our people can bring their whole selves to work
- **External engagement:** Having a diverse workforce and leadership that is representative of Aotearoa, and actively celebrating and promoting our diverse culture externally
- **Organisational development:** Ensuring our people are competent and confident to engage internally and externally to meet the diverse needs of Aotearoa
- **Monitoring:** We'll track and regularly report on key DEI metrics to inform our work programme, as well as celebrate success

Within each of these areas there will be both short and long term initiatives to help us deliver on our ambition.



We'll use these principles to inform our approach

- Honour Te Tiriti o Waitangi in all our mahi
- Use our regulatory knowledge and insights to inform and share what we know about DEI external to WorkSafe
- Partner with existing and emerging staff networks. Connect and champion each other's work
- Start from a place of no assumptions. Uplift WorkSafe's understanding of diversity, equity and inclusion
- Sustainable and approach adaptive to embed lasting change as well as acting on opportunities for instant improvement
- Make space and address equity for staff from historically excluded communities
- Meet the obligations and expectations of Te Kawa Mataaho
- Partner with communities, subject matter experts, and those with lived experience to guide and inform our direction



When we'll know we're making progress

- Our people regularly tell us WorkSafe is an inclusive, respectful, and welcoming workplace
- Improved representation aligned to the communities we serve across Aotearoa
- Improved engagement and connection across WorkSafe
- Achieving 'leader status' in the Safe Plus Assessment
- Improved cultural capability, in particular in relation to Te Ao Māori
- Recognised externally as a workplace of choice

Our values

Our WorkSafe mātaḡono (values) guide our behaviour and actions.



WHAKAKOTAHI
Kia whakakotahi, kia aronui tahi tātou
We're united in a strong purpose



TIAKINA MAI
Kia tiakina i roto i ngā mahi katoa
We're entrusted with a duty of care



KŌRERO MAI
Kia whakapāpā tahi tātou
We engage meaningfully

4.0

Gaining insights to better understand the drivers behind our gender and ethnic pay gap

- 4.1 Engaging with our kaimahi
- 4.2 Aotearoa Inclusivity Matrix – Diversity Works
- 4.3 Accessibility tick and DEI plan refresh

4.1 Engaging with our kaimahi

In the financial year 2022–2023, we carried out 156 individual interviews with our kaimahi to gain a deeper understanding of their workplace experiences. The objective was to align changes with our strategy and transformation goals and embed them within our new operating model.

Overall, the interviews revealed that our employee experience has developed organically, driven more by processes than by people, leading to inconsistency in creating an optimal environment for connection, performance, and growth. The assessment supported our understanding of the root causes, which has enabled us to design targeted interventions and inform future programmes more effectively.

Our employee experience model categorises themes into four areas: performance experiences, relationship experiences, enabling experiences, and purpose experiences. These insights are informing improvements in key areas such as induction, performance management, communication, engagement processes, and leadership development. Relevant actions have been integrated into our gender and ethnic pay gap action plan.

4.2 Aotearoa Inclusivity Matrix – Diversity Works

In 2023, we completed the Aotearoa Inclusivity Matrix, an evidence-based framework developed specifically for New Zealand workplaces. It assesses organisational maturity across seven diversity, equity and inclusion components: leadership, diversity, infrastructure, diverse recruitment, inclusive career development, bi-culturalism, and inclusive collaboration and social impact.

The assessment found that diversity, equity and inclusion have a strong foundation and is a strategic priority for WorkSafe. While current initiatives exist to support diversity, equity and inclusion, there are opportunities to increase consistency and impact. Recommendations have been incorporated into our current and future action plans.

4.3 Accessibility Tick and DEI plan refresh

In 2025, we are undertaking Accessibility Tick accreditation across four areas: commitment, recruitment and selection, employee support, and career development. This assessment will demonstrate our active commitment to accessibility and inclusion, ensuring our processes are fully accessible and that we can confidently recruit, retain and support disabled and neurodivergent people.

We are also refreshing our DEI plan in 2025, working collaboratively with our kaimahi, employee-led networks, and the PSA to co-develop our approach. The findings from the Accessibility Tick assessment will inform this refreshed plan alongside ongoing stakeholder engagement.

5.0

Action plan

KIA TOIPOTO FOCUS AREA AND MILESTONE	2024 ACTIVITIES	STATUS	PLANNED ACTIVITIES FOR 2025/2026	SUCCESS MEASURES
Transparency <ul style="list-style-type: none">- Agencies and entities publish annual action plans based on gender and ethnicity data and union and kaimahi.- Feedback.- Agencies and entities ensure easy access to HR and remuneration policies, including salary bands.	<ul style="list-style-type: none">- Publish updated action plan.- Develop plan in partnership with employee networks.- Continue to review and publish all roles and associated sizing on our intranet, following review of our position descriptions and pay bands.	<ul style="list-style-type: none">- Complete.- Complete.- Roles included in the recent organisational change process have been reviewed and pay bands published on our intranet.	<ul style="list-style-type: none">- Continue to publish our action plan.- Establish DEI working group.	<ul style="list-style-type: none">- Report published by 1 September every year.- DEI working group established with clear terms of reference and quarterly deliverables met.
Equitable pay outcomes <ul style="list-style-type: none">- By the end of 2022 entities ensure that starting salaries and salaries for the same or similar roles are not influenced by bias.- Agencies monitor starting salaries and salaries for the same or similar roles to ensure.- Gender and ethnic pay gap does not reopen.- Pay equity processes are used to address claims and reduce the impact of occupational segregation.	<ul style="list-style-type: none">- Conduct a review of reference markets for all roles.- Increase rigour in our starting salary practices.- Continue to monitor and report our starting salaries.	<ul style="list-style-type: none">- In progress. All roles within the change process were reviewed.- Quarterly report for starting salaries was paused during change.	<ul style="list-style-type: none">- Resume quarterly starting salary monitoring and reporting.- Initiate Management fundamentals programme and include inclusive recruitment practices.	<ul style="list-style-type: none">- Quarterly reports show compliance with salary bands and pay equity guidelines.- Management fundamentals programme launched with >75% manager participation.
Leadership and representation <ul style="list-style-type: none">- By the end of 2022 agencies and entities have plans and targets to improve gender and ethnic representation in their workforce and leadership.- By the end of 2024 the Public Service workforce and leadership are substantially more representative of society.	<ul style="list-style-type: none">- Gather data on gender, ethnicity and disability from our existing kaimahi.- Evaluate our talent management practices, enhancing opportunities for diversifying our talent pool.- Review the percentage of applicants transitioning from application to interview to placement stages, to identify and address any potential barriers in the process.- Investigate offerings, opportunities and development initiatives for underrepresented communities.- Embed additional diversity data into regular reporting, to maintain focus on gender and ethnic representation across our workforce and leadership.- Enhance how we advertise our internal roles and secondment opportunities to our kaimahi.	<ul style="list-style-type: none">- In progress. ELNs have expressed interest in supporting this mahi. However, suggested it is paused until FY25/26.- Workforce planning is underway within the inspectorate.- Report to monitor the gender and ethnicity of candidates moving through the process is initiated for the Inspectorate.- Leadership development programme launched in quarter 4 24/25 we will monitor participant data quarterly.- DEI data included in internal reporting.- Internal advertisement of roles has increased, shared regularly on the intranet.	<ul style="list-style-type: none">- Gather data on gender, ethnicity and disability from our existing kaimahi.- Expand recruitment monitoring reports to cover all departments, not just Inspectorate.- Continue internal DEI reporting.- Continue advertising roles internally.- Investigate if we can track representation in all learning programmes.	<ul style="list-style-type: none">- Comprehensive diversity data collected.- Diversity data baseline established for future tracking.- Quarterly representation reports show improvement trends across all diversity dimensions.
Effective career and leadership development <ul style="list-style-type: none">- By mid-2023 agencies and entities have career pathways and equitable progression opportunities that support women, Māori, Pacific and ethnic employees to achieve their career aspirations.	<ul style="list-style-type: none">- Develop career development resources and integrate them into existing and future people practices, such as development discussions.- Introduce our new leadership capability programme.- Assess the participation levels of our internal learning initiatives, with a focus on gender and ethnic representation.	<ul style="list-style-type: none">- Initial career development resources have been developed and shared with the organisation.- Leadership development programme launched in quarter 4 24/25.- Initiated, scoping phase, paused due to organisational change.	<ul style="list-style-type: none">- Review promotion processes and career development tools to identify advancement any barriers, incorporating Accessibility Tick findings.- Develop and pilot a mentoring programme with our employee-led networks.- Investigate targeted development opportunities for underrepresented groups based on kaimahi feedback and Accessibility Tick findings.- Continue scoping and begin implementing diversity tracking in learning programmes.	<ul style="list-style-type: none">- Promotion processes reviewed with accessibility recommendations implemented.- Mentoring programme piloted with target participation rates and initial feedback collected.- Investigation completed with targeted development programme designed and ready to pilot.- Diversity tracking piloted in key learning programme.

KIA TOIPOTO FOCUS AREA AND MILESTONE	2024 ACTIVITIES	STATUS	PLANNED ACTIVITIES FOR 2025/2026	SUCCESS MEASURES
Eliminating all forms of bias and discrimination <ul style="list-style-type: none">- By the end of 2023 entities have remuneration and HR systems, policies and practices designed to remove all forms of bias and discrimination.- Agencies embed and monitor the impact of bias-free HR and remuneration policies and practices.- Agencies and entities ensure leaders and employees learn about and demonstrate cultural competence.	<ul style="list-style-type: none">- Conduct our Māori capability survey to assess the development of the knowledge of our kaimahi and their understanding of te ao Māori and gather their perspectives on the enhancement of te ao Māori capability within our organisation.- Continue enhancing our Māori cultural competency through Maruiti, our Māori strategy.- Ensure that our kaimahi engage with existing cultural competency and diversity, equity and inclusion learning opportunities.- Initiate a review of our people policies, guidelines and practices to identify and eliminate potential biases, such as those relating to recruitment, reward and remuneration, career progression, breaks, and leave (including primary carer leave).	<ul style="list-style-type: none">- Complete.- Te ao Māori capability programme uplift initiated, will be completed in FY25/26.- Completion rates for cultural competency and diversity, equity and inclusion courses have increased.- In progress. This mahi was paused during change.	<ul style="list-style-type: none">- Continue to conduct our te ao Māori capability survey.- Initiate review of cultural competency resources.- Resume review of our people policies, guidelines and practices based on findings from the Accessibility Tick.	<ul style="list-style-type: none">- Te ao Māori capability survey completed with increased participation rates.- Cultural competency review completed with recommendations implemented.- Policy review completed with recommendations implemented and compliance achieved.
Flexible work by default <ul style="list-style-type: none">- By the end of 2024 agencies and entities offer equitable access to flexible-by-default working and ensure it does not undermine career progression or pay.	<ul style="list-style-type: none">- Continue to integrate our flexible working principles and practices and provide support to our kaimahi and leaders in fostering a culture of flexible working.- Share learnings and initiatives from our Wellington office move across the organisation.	<ul style="list-style-type: none">- Ongoing. We continue to see strong employee survey results regarding work-life balance.- Completed, learnings applied to subsequent building moves across the organisation.	<ul style="list-style-type: none">- Integrate accessibility requirements into flexible working guidelines.	<ul style="list-style-type: none">- Flexible working guidelines updated to meet accessibility standards and compliance requirements.

TABLE 1: Our gender and ethnic pay gap action plan

6.0

Measure and analyse gender and ethnic pay gap

- 6.1 Workforce representation – what the data tells us
- 6.2 Gender pay gap
- 6.3 Gender and ethnic pay gap
- 6.4 Gender distribution in more detail
- 6.5 Pay gap analysis in more detail

	WORKFORCE REPRESENTATION	ALL MANAGERS	LEADERS TIERS 1-3
Gender			
Men	50.7%	52.9%	68.8%
Women	49.3%	47.1%	31.2%
Non-binary	-	-	-
Ethnicity			
New Zealand Pakeha/European	59.2%	52.9%	50%
Māori	8.0%	8.2%	11.5%
Pacific Peoples	3.0%	3.5%	3.8%
MELAA	2.4%	2.4%	0%
Asian	9.9%	7.1%	7.7%
Other	3.7%	3.5%	0%
None	13.8%	22.4%	27%
Totals	100%	100%	100%

TABLE 2: Workforce data**Notes:**

- All ethnicity data provided is on the basis kaimahi can only select one ethnicity at present.
- MELAA stands for Middle East, Latin America and Africa. 'None' is when people have not disclosed their ethnicity.
- Gender diverse data is not reported due to insufficient sample size to maintain confidentiality and statistical reliability.

6.1 Workforce representation – what the data tells us

Our workforce data shows a mixed picture of progress and challenges. While women's representation in the overall workforce decreased slightly by 1.1%, from 51.8% to 50.7%, women's representation in senior leadership increased by 10%, from 58.8% to reach 68.8% in tier 1-3 roles (our most senior positions). This creates a strong foundation for future leadership development.

Ethnic diversity in our workforce shows different patterns. New Zealand Pākehā/European representation decreased by 3.7%, from 62.9% to 59.2%, while Māori representation dropped slightly to 8% from 8.6%. Pacific Peoples representation stayed about the same with a 0.1% decrease to 3%. Asian representation grew by 1%, from 8.9% to 9.9%, and MELAA representation declined from 3.2% to 2.4%. The percentage of staff who didn't record their ethnicity increased from 10% to 13.8%.

Our leadership diversity tells a more positive story. Māori representation in senior roles has grown from 9.1% to 11.5%, well above their 8% workforce representation. Asian representation in tier 1-3 leadership increased by 4.7%, from 3.0% to 7.7%, and Pacific Peoples representation has grown by 0.8%, from 3.0% to 3.8% in the same tiers. The percentage of our senior leaders who didn't record their ethnicity increased from 18.2% to 27%. We will investigate why this is and how we can improve disclosure rates.

6.2 Gender pay gap

	NUMBER OF EMPLOYEES		MEDIAN SALARY		MEAN SALARY	
	2024	2025	2024	2025	2024	2025
Female	320	291	\$107,385	\$109,910.50	\$119,644	\$125,045.78
Male	298	283	\$119,560.5	\$122,424.00	\$128,179	\$131,596.14
WorkSafe	618	574	\$114,998	\$118,448.00	\$123,759	\$128,275.31
Gender pay gap			10.2%	10.2%	6.7%	5.0%

TABLE 3: Gender pay gaps (mean and median)

Our gender pay gap has remained stable at 10.2% (median) in 2025, maintaining the significant improvement we achieved from 12.9% in December 2022. This represents sustained progress after the reduction we made in 2022.

6.3 Gender and ethnic pay gap

	WORKSAFE	NEW ZEALAND PUBLIC SERVICE 2024	NEW ZEALAND 2024
Gender pay gap	10.2%	6.1%	8.2%
Ethnic pay gap			
Group			
European	-3.4%	N/A	N/A
Māori	4.0%	4.8%	N/A
Pacific Peoples	9.1%	17.2%	N/A
Asian	-1.5%	13.8%	N/A
MELAA	4.9%	N/A	N/A
Other	-7.6%	N/A	N/A
Not recorded	7.4%	N/A	N/A

TABLE 4:
Gender and ethnic pay
gaps with WorkSafe,
New Zealand Public
Service 2024, and
New Zealand 2024
comparisons

The 2024/25 financial year shows mixed results on ethnic pay equity, with some good progress alongside areas that need attention.

Asian employees made excellent progress, with their pay gap reducing by 12.8% points. They moved from having a significant gap of 11.3% to now earning slightly more than average, with a -1.5% median gap. The MELAA pay gap also improved, with the pay gap decreasing by 1.1%, though they still have a 4.9% gap that needs work.

However, Pacific Peoples’ pay gap increased by 4.3% from 4.8% to 9.1%. Māori employees also saw their gap grow by 1.6%, moving from 2.4% to 4.0%. Our analysis suggests that the increased pay gaps for Māori and Pacific Peoples are primarily due to representation across different levels of our organisation, rather than differences in pay for the same roles. When we look at pay within the same job levels, we see fair and equitable pay. The challenge is ensuring we have strong representation of Māori and Pacific Peoples at all levels of our organisation.

When we compare our results to wider public service data, we get a mixed picture. While our Māori gap (4.0%) is still slightly better than the public service average (4.8%), our Pacific Peoples gap (9.1%) is much lower than the sector average (17.2%). Our gender gap (10.2%) sits higher than the public service average (6.1%) and the broader New Zealand average (8.2%).

The growing gaps for Pacific Peoples and Māori, along with losing all MELAA and Other ethnicity representation in senior leadership, show that we need to strengthen our approach to ensure steady progress across all groups. We will investigate ways to improve representation and address the remaining drivers behind these gaps as part of our action plan.

6.4 Gender distribution in more detail

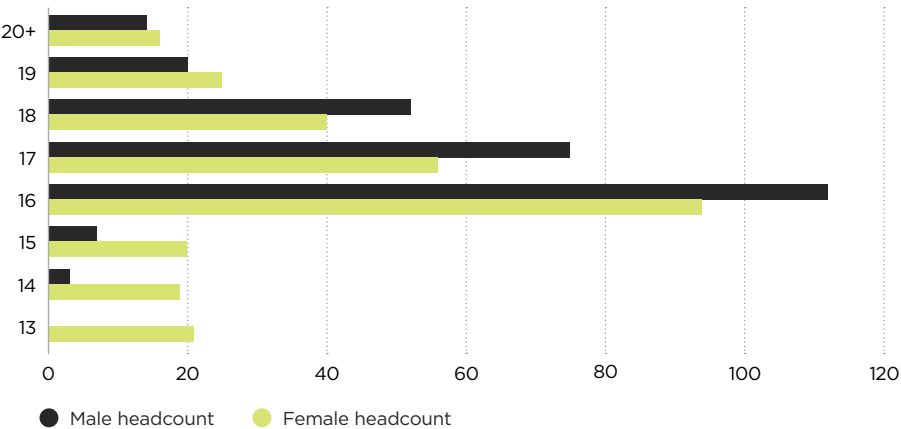


FIGURE 1:
Gender distribution
by band

Our gender split across pay bands shows both good progress and ongoing challenges. At senior leadership levels, we’ve made real progress with our most senior roles (band 20+) changing from mostly men to mostly women, and band 19 now having much better balance. This shows we can attract and hire women into senior positions.

The lower pay bands tell a different story, with bands 13–15 now mostly women. Band 13 is now entirely women, while bands 14–15 have strong female representation. This pattern could mean we need to do a better job attracting men to these roles, or it might point to barriers that prevent career advancement to senior positions.

However, the middle bands are our biggest challenge. Most people in bands 16–18 are men, despite our progress elsewhere. Band 17 became mostly male, while band 18 stayed mostly male even though overall numbers dropped. These bands create a bottleneck in our organisation.

This middle band imbalance has a big impact on our overall pay gap. Whilst we’ve made real progress at senior levels, having mostly men in bands 16–18 holds back these improvements when we look at pay across the whole organisation. These middle bands affect our pay gap the most because the salaries are good, so having unequal numbers of men and women matters more than changes at the very top or bottom.

6.5 Pay gap analysis in more detail

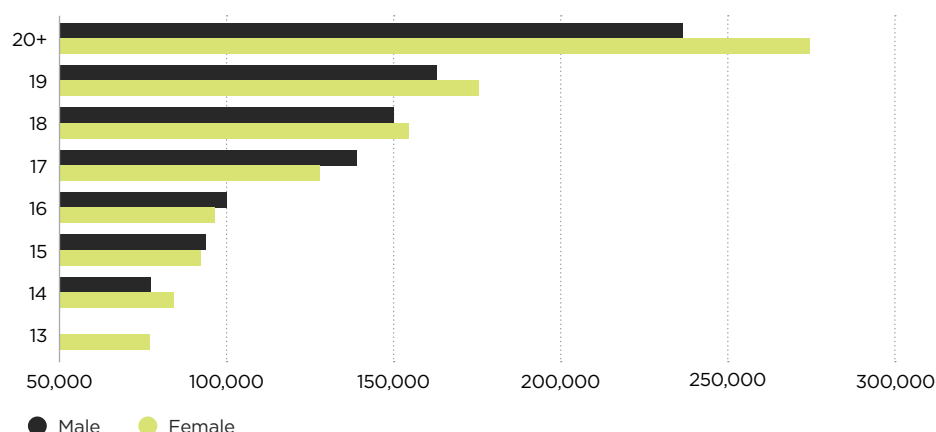


FIGURE 2:
Average full-time
equivalent salary
by gender by band

Our analysis reveals a complex pattern: women earn more than men in most of our pay bands. In four out of eight bands, women's average pay is higher than men's. Women in bands 19 and 20+ earn more than their male colleagues, and even in lower bands like band 14, women earn more on average.

A notable example is bands 20+, where women earn more than men despite similar representation in the band. This is our largest pay difference and warrants investigation to understand whether this reflects differences in role types, experience, or other factors within our most senior positions.

However, men earn more in three specific bands. Two of these are our most densely populated bands (bands 16 and 17), where men significantly outnumber women. There's also an unusual situation in band 15, where despite women significantly outnumbering men (20 women versus 7 men), men still earn more on average. This needs further investigation to understand what's causing this.

Interestingly, even in band 18 where men make up the majority, women earn more on average.

The overall 10.2% pay gap continues not because of unfair pay for the same work, but because of where men and women sit within our organisation. Men far outnumber women in the largest, well-paid bands. Band 16 has 112 men versus 94 women. Band 17 has 75 men versus 56 women. Even band 18, where women earn more, has 52 men versus 40 women.

Meanwhile, women are concentrated in lower-paying positions. Band 13 is entirely female, while bands 14–15 are mostly female.

This shows that our pay gap isn't about unfair pay within roles. Women are getting fair or even better pay for the work they do. Instead, the issue is how roles are distributed. It seems that women aren't getting access to higher-paying positions in sufficient numbers. This suggests our focus should be on career advancement opportunities, recruitment strategies, and removing barriers to accessing these well-paid, more populated roles rather than adjusting pay scales.

While our immediate focus is on addressing role distribution, we will also examine what's causing higher female pay in certain bands to ensure our pay practices are consistently fair and transparent. We will investigate the band 15 situation as part of our 2025 pay equity review process.

Disclaimer

WorkSafe New Zealand has made every effort to ensure the information contained in this publication is reliable, but makes no guarantee of its completeness.

It should not be used as a substitute for legislation or legal advice. WorkSafe is not responsible for the results of any action taken on the basis of information in this document, or for any errors or omissions.

ISBN 978-1-99-105755-6 (online)

Published: August 2025

PO Box 165, Wellington 6140, New Zealand

worksafe.govt.nz



Except for the logos of WorkSafe, this copyright work is licensed under a Creative Commons Attribution-Non-commercial 3.0 NZ licence.

To view a copy of this licence, visit <http://creativecommons.org/licenses/by-nc/3.0/nz>

In essence, you are free to copy, communicate and adapt the work for non-commercial purposes, as long as you attribute the work to WorkSafe and abide by the other licence terms.

