

Pay Transparency and Gender Pay Gap Reporting: The Status Quo

With the 7th of June 2026 deadline for transposing the EU Pay Transparency Directive fast approaching, many Organisations are seeking clarity on what the changes will mean in practice and when Ireland's implementing legislation will be published.

At the time of writing, there has been no formal confirmation from the Irish Government regarding the timing or status of the domestic legislation required to give effect to the Directive. While informal commentary from the Department of Children, Disability and Equality has suggested implementation may occur on a phased basis, no definitive timeline has yet been issued.

Current Gender Pay Gap Reporting Obligations Still Apply

In the absence of transposing legislation, the existing Irish gender pay gap reporting framework remains in force for the 2026 reporting cycle.

Employers should therefore continue to comply with their obligations under the Employment Equality Act 1998 (Section 20A) (Gender Pay Gap Information) (Amendment) Regulations 2025. For Organisations currently in scope, this means:

- Selecting a snapshot date in June 2026 for capturing pay data
- Publishing the gender pay gap report within five months of the chosen snapshot date

Central Reporting Portal Expected to Become Mandatory

The Government's Summer Legislation Programme includes a Gender Pay Gap Information (Amendment) Bill which will look set to formally require in-scope Organisations to publish their gender pay gap reports through a central government reporting portal in 2026.

While the portal operated on a pilot basis during 2025, it is expected to become a mandatory reporting channel for the 2026 cycle once the necessary legislative amendments are introduced.

The EU Timeline Has Not Changed

Importantly, despite efforts by some Member States to delay implementation, the EU-level deadline remains unchanged. Member States are still formally required to transpose the EU Pay Transparency Directive by 7 June 2026.

As a result, Organisations should continue preparing for the significant changes the Directive will introduce, even if the precise Irish implementation timeline remains uncertain.

What Will Change Under the Pay Transparency Directive?

The Directive will introduce a far more detailed and structured framework than the current reporting model. Key developments are expected to include:

- Reporting on gender pay gaps across 'categories of workers' performing work of equal value
- Enhanced pay transparency rights for Employees and job applicants
- Increased scrutiny of pay structures, job classification systems and pay governance arrangements

- Greater obligations around pay-related communication and transparency
- Expanded Employee access to pay-related information

For many Organisations, this will require a more sophisticated approach to job architecture, pay benchmarking and internal governance processes.

What Should Employers Be Doing Now?

While awaiting the necessary legislative amendments, Organisations should use this period to strengthen their overall pay transparency readiness.

Practical steps Employers can take now include:

- Reviewing and formalising pay structures and remuneration policies
- Strengthening job architecture and job evaluation frameworks
- Assessing gender pay gaps at a more detailed level, including comparable roles performing work of equal value
- Preparing for increased Employee pay information requests
- Ensuring HR and payroll systems can support more complex reporting obligations
- Reviewing governance processes around pay decision-making and transparency

Early preparation will place Organisations in a much stronger position once the Directive is fully transposed and enforcement expectations become clearer.

Key Takeaway

Historically, changes to Ireland's gender pay gap reporting regulations have often been published shortly before the June snapshot period. Organisations should therefore continue to monitor developments closely over the coming weeks while proceeding on the basis that the current reporting framework remains in place until new legislation is formally introduced.

At the same time, this period presents an important opportunity for Organisations to move beyond compliance and begin embedding broader pay transparency principles across their business.

Taking proactive steps now, particularly around job evaluation methodologies, pay governance and reporting capability, can help ensure a smoother transition and reduce future compliance risk.

How Adare Can Help

Preparing for the new legal framework being introduced by the EU Pay Transparency Directive requires more than a policy update, it requires confidence in your pay structures, your pay data and your decision-making processes.

We support Irish Organisations by:

- Conducting a full compliance review of your gender pay gap data
- Identifying gaps and providing strategic insight

- Preparing your GPG report ensuring it reflects the challenges faced by your Organisation
- Assessing readiness for Employee pay information requests
- Supporting the development of clear job architecture and role categorisation aligned with 'work of equal value' principles
- Reviewing pay structures, pay ranges and progression frameworks to ensure they are objective and defensible
- Conducting pay risk and equal pay assessments ahead of Employee requests
- Advising on practical processes for responding to pay information requests clearly, consistently and compliantly
- Supporting HR and leadership teams with guidance, training and communications as pay transparency obligations evolve

Adare is a team of expert-led Employment Law, Industrial Relations and best practice Human Resource Management consultants. If your Organisation needs advice, support, or guidance about pay transparency compliance requirements or any HR issues, please contact Adare by calling 021 486 1420 or emailing info@adarehrm.ie to learn what services are available to support your business.