

International Equal Pay Day: A Timely Prompt to Prepare for Pay Transparency

International Equal Pay Day was recently celebrated on the 18th of September.

In recognition of this year's International Equal Pay Day, this article takes the opportunity to reflect on the practical steps Organisations can take to prepare for the changes ahead under the EU Pay Transparency Directive.

Importantly, some of the Directive's requirements will apply regardless of an Organisation's headcount. All Organisations should therefore be considering what changes may be needed, rather than reacting when the Irish legislation takes effect.

While the Directive was due to be transposed into Irish law by the 7th of June 2026, Ireland has not yet completed the transposition process. The most recent update from the Department of Children, Disability and Equality confirmed only that implementation will proceed on a phased basis.

The delayed implementation means that Organisations have additional time before all of the new requirements take effect. This intervening period provides a valuable opportunity to identify potential compliance gaps, establish priorities and address areas where existing processes may not support the forthcoming requirements.

Employee Rights to Pay Information

One of the key measures with broad application across all Organisations is the new Employee right to request pay information.

Employees will have the right to request information about their own pay level and the average pay levels, broken down by sex, of Employees performing the same work or work of equal value.

The information must be provided within two months of a request, and Organisations will also be required to remind Employees of this right annually.

This means Organisations will need to be able to identify relevant categories of workers doing work of equal value and access reliable pay information when a request is made.

Organisations should consider whether they currently have:

- reliable and accessible pay data
- clear job categories and role classifications
- a consistent approach to identifying work of equal value
- clear responsibility for managing employee pay information requests, and
- a process for responding to requests within the required timeframe and issuing the annual reminder.

These are practical considerations that can be reviewed now, even while the detail of the Irish legislative framework is being finalised.

Recruitment: Greater Transparency From the Outset

One of the most significant changes coming in under the Directive will be the introduction of greater pay transparency during the recruitment process.

Organisations will be required to provide jobseekers with information about the initial pay level or salary range for a role.

Organisations will also be prohibited from asking candidates about their current or previous salary. This will require Organisations to consider how salary information is determined, approved and communicated during recruitment.

For example, Organisations should review:

- whether salary ranges or starting pay are established before a role is advertised
- where responsibility sits for determining the pay offered for a particular role
- whether job advertisements and recruitment materials will need to change
- what information is provided to candidates during the recruitment process
- whether recruitment agencies and other third parties used by the Organisation are aligned with the new requirements, and
- whether hiring managers are currently asking candidates about their current or previous salary.

The prohibition on pay-history questions will also require attention beyond the wording of job advertisements. Organisations should consider their application forms, interview guidance, recruitment policies and training for hiring managers to ensure that pay-history questions are not raised during the recruitment process.

What Can Organisations Do Now?

The current delay in implementation provides an opportunity to undertake a targeted review rather than waiting for the legislation to be finalised.

Useful starting points for business leaders to consider include:

1. Review pay data: assess whether relevant pay information can be easily retrieved and analysed.
2. Review job classifications: consider whether there is a clear basis for identifying Employees doing the same work or work of equal value.
3. Review recruitment practices: consider how salary information is communicated and whether pay-history questions are used.
4. Consider how pay information requests might be managed: establish who would manage an Employee request and how the Organisation would respond within the required timeframe.
5. Identify compliance gaps: review relevant policies, processes, systems and responsibilities and prioritise areas requiring attention.
6. Monitor implementation: keep plans under review as further detail on the Irish legislative framework becomes available.

Turning Delay Into Opportunity

The recent observance of International Equal Pay Day provides a timely checkpoint for Organisations to consider whether their existing pay practices, pay data and processes are ready for greater pay transparency.

The objective at this stage does not need to be completing a full pay transparency exercise. Instead, Organisations can use the additional time created by the delayed implementation to understand the requirements, identify potential gaps and address those areas already within their control.

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:

- 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.