

Gender Pay Gap Update: Draft Law Published Around New Reporting Requirement

In-scope Organisations should prepare for additional reporting requirements this year as gender pay gap reporting evolves.

Changes to gender pay gap reporting are on the horizon for Organisations with 50 Employees or more. The *Employment Equality and Institutional Burials (Amendment) Bill 2026* proposes amendments to the Employment Equality Act 1998 that will introduce an additional reporting requirement for Organisations within scope.

Alongside their existing obligation to publish gender pay gap results, relevant Organisations will be required to submit their information to the Minister for Children, Disability and Equality.

With the legislative changes expected to be progressed ahead of the November 2026 reporting window, Organisations should bear this additional requirement in mind to ensure they are ready to report next month.

What will the changes mean for in-scope Organisations?

Direct reporting to the Minister

In-scope Organisations will be required to submit their gender pay gap information to the Minister, in addition to publishing their results as they currently do. This will formalise the submission of gender pay gap data to the Government as part of the reporting process.

Confirmation of data accuracy

Organisations will be required to confirm the accuracy of the information submitted, qualified by the wording 'in so far as' the Employer is aware. Robust data collection, validation and internal review processes will therefore be essential to support accurate reporting.

A requirement to correct non-compliant submissions

The Minister will have the authority to return an Employer's statement where it does not meet the applicable requirements. Employers will then need to address the identified issues and resubmit the statement in accordance with the relevant rules.

Publication and comparison of gender pay gap data

The proposed legislation will also give the Minister the authority to publish information received and use it for comparison purposes, in accordance with the relevant regulations.

Further detail on how these arrangements will operate in practice is expected through implementing regulations. The Government's online portal, which has been available for voluntary registration since November 2025, is expected to be the vehicle for both reporting to the Minister and making data comparisons.

What should in-scope Organisations do now?

Organisations with 50 or more Employees should continue preparing for their existing gender pay gap reporting obligations for the 2026 reporting cycle, while also preparing for the additional reporting requirements.

Key priorities include:

- Review data and calculations to ensure they are accurate, complete and supported by reliable records.
- Prepare for the additional submission requirement by reviewing reporting responsibilities and readiness to use the Government's online portal.

- Monitor the final requirements as the legislation progresses and further guidance is issued.
- Seek expert HR support to ensure your Organisation is prepared for the reporting process and any additional compliance requirements.

Be ready for November 2026

The Bill remains subject to the legislative process, and the final requirements will be determined by the legislation as enacted and any implementing regulations. Although the November reporting window is just weeks away, the changes are expected to be in place for this year's reporting cycle and Organisations should not wait until the final requirements are confirmed to begin preparing.

How Adare Can Help

Organisations that take a proactive approach to gender pay gap reporting will be better positioned to demonstrate transparency, accountability and commitment to workplace equality.

Adare's Pay and Pay Equity Services are here to ensure your Organisation meets all applicable requirements by the November deadline. Our expert team will:

- Thoroughly analyse your pay data for full GPG compliance
- Pinpoint disparities and deliver actionable insights
- Prepare your official GPG report ensuring timely reporting and publication

Minimise the risks of non-compliance and let Adare take the hassle out of preparing your GPG report.

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 employment law compliance, gender pay gap reporting 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.