

## THE EU PAY TRANSPARENCY ACT PREP CHECKLIST

What Irish HR and payroll leaders should do before June



### THE EU PAY TRANSPARENCY DIRECTIVE IS COMING

From June, Irish employers will face new obligations around pay transparency, reporting and fairness. HR and Payroll will be central to compliance - from producing reliable pay data to supporting fair and transparent pay decisions.

Use this checklist to sense-check whether your organisation is ready for what's next.

### WHY THIS MATTERS NOW

Pay transparency is a shift in how organisations hire, reward and communicate with their people.

From June:

- Employers must disclose pay ranges to candidates and employees.
- Organisations must report and address gender pay gaps and justify pay differences.
- HR and payroll must produce accurate, structured and comparable pay data.

Early preparation reduces compliance risk and builds trust, retention and credibility.

### Key takeaways

- Pay transparency is a data challenge first, compliance challenge second
- HR and Payroll must align on job architecture, pay structures and reporting
- Transparent, gender-neutral pay practices will become mandatory
- Organisations that prepare early gain strategic advantage

## THE PAY TRANSPARENCY PREP CHECKLIST

### Understand your regulatory starting point

○ 1

Map the Directive requirements against your current Irish Gender Pay Gap obligations and broader pay governance framework, using this to build a clear and practical compliance roadmap. You should identify the specific requirements that apply across recruitment transparency, pay reporting and employee information rights, while also confirming when your organisation will fall within reporting thresholds. Clear executive ownership across HR, Payroll, Reward and Legal should be established early to ensure accountability and coordinated delivery.

### Audit your job architecture and grading structure

○ 2

Pay transparency relies on clear, consistent and comparable roles across the organisation. Review your job classification and levelling framework to ensure roles performing equal work are grouped appropriately and evaluated using gender-neutral, objective criteria. Your organisation should also ensure that the methodology used to determine and set pay is documented, structured and consistently applied.

### Run a pay equity and pay gap diagnostic

○ 3

Before June, organisations should identify potential risk rather than waiting for formal reporting deadlines. This means conducting a structured pay equity analysis across comparable roles, identifying any unexplained gender pay gaps, modelling likely reporting outcomes and preparing realistic remediation scenarios where gaps are identified.

### Ensure payroll data is accurate, structured, and reportable

○ 4

Payroll will sit at the centre of pay transparency compliance, making data accuracy and structure critical. Organisations should validate base pay, bonus, allowance and benefit data, ensure employees are categorised correctly for comparison purposes, confirm they can generate Directive-ready reports and maintain audit-ready historical pay records supported by strong data integrity controls.

### Review pay policies and governance

○ 5

Transparent pay requires decisions that are consistent, documented and defensible. Organisations should ensure pay decisions are aligned to objective and gender-neutral criteria, review promotion and pay progression frameworks, confirm that pay structures are documented and applied consistently and embed approval workflows alongside clear audit controls.

### Prepare for recruitment transparency

○ 6

From June, recruitment practices must support pay transparency. Organisations should define clear salary ranges for roles, remove salary history questions from hiring processes, train hiring managers on transparency requirements, and ensure job advertisements align with structured and transparent pay frameworks.

### Build employee pay information capability

○ 7

Employees will gain stronger rights to request pay information, so organisations must be operationally ready. This involves defining a clear process for handling requests, preparing consistent communication and disclosure templates, enabling reporting on pay by gender and employee category, and ensuring that response timelines can be met reliably.

### Prepare for joint pay assessments (if gaps exist)

○ 8

Where unexplained gender pay gaps remain, employers may need to conduct formal joint pay assessments. Organisations should identify potential threshold triggers, prepare a structured assessment and remediation process, align HR, Payroll and employee representatives, and build the capability to design and implement corrective actions where required.

### Train HR, Payroll, and managers now

○ 9

Compliance will depend on behaviour, not just systems. Organisations should ensure HR, Payroll and leadership teams understand Directive obligations, are equipped to make fair and evidence-based pay decisions and operate aligned workflows that support transparency. Building internal capability early will reduce risk and improve consistency.

### Check your technology and reporting readiness

○ 10

Many legacy systems are not designed for pay transparency. Organisations should confirm that HR and payroll systems can produce Directive-ready reporting, generate accurate pay gap analysis quickly, provide employee pay data on request and maintain secure, automated audit and compliance records.

### Build a transparent pay narrative

○ 11

Pay transparency is as much about communication as it is about reporting. Organisations should define how pay decisions and structures are explained, align transparency with broader ESG and fairness goals, prepare clear leadership messaging and focus on building employee trust through clarity, consistency and openness.

### Create your June readiness plan

○ 12

Insight must now translate into action. Organisations should prioritise the highest compliance risks, set clear milestones between now and June, align HR, Payroll, Reward, and Legal teams, and establish governance and reporting rhythms to track progress.

## NEXT STEPS

Organisations that act early will approach June prepared rather than reactive.

Zellis supports Irish organisations in building transparent and compliant pay frameworks, automating gender pay and transparency reporting, delivering accurate audit-ready payroll data and aligning HR, Payroll, and Reward through a single platform.



Find out how Zellis helps Irish organisations deliver accurate, transparent, compliant pay, powered by AI-enabled HR, Workforce Management and Pay through Zellis One.

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