Pay Transparency - Stop pretending you have time

A client recently asked me: "Will Ireland actually transpose the EU Pay Transparency Directive?" The better question for HR leaders is: if your CEO asked tomorrow **"can we defend our pay practices?",** would you be comfortable saying yes?

Ireland has a less than flattering track record when it comes to transposing EU equal pay legislation. Historically, we move fastest on equal pay when Europe removes the option to delay. The 1970s serve as a good case study of Ireland's approach to these matters.

- During EEC accession, Ireland tried to carve out flexibility on equal pay—warning about cost, jobs and "disruption" in low-paid, female-dominated sectors. Sound familiar?
- Europe said no to the derogation/postponement request: equal pay was non-negotiable. Ireland adapted—marriage bar gone (1973), women's participation in the workforce rose, and the Irish legal framework caught up fast.
- Irish domestic law followed the refusal of a derogation: Anti-Discrimination (Pay) Act 1974; enforceable equal pay from 1976—after some time-boxed postponements.

Our pattern in Ireland has been delay, then delivery. Translation: when the external deadline is real, "complexity" becomes solvable. Now swap "equal pay" for "pay transparency". Same instincts. Same objections. Same outcome. For those still sitting on the "pay transparency preparation fence" (and there are many of you) here is my advice;

- The pay transparency genie is well and truly out of the bottle. If you competitors can be transparent about their approach to pay, and you can't, this is not a legal issue—this is a leadership issue.
- Waiting for Ireland's exact timeline is a comfort blanket. While there has been postponements across other EU member states on the Directive, these postponements are usually 6–12 months—less than one pay review cycle and a short time in the context of the amount of work required to prepare for pay transparency.
- If you can't explain your pay and job architecture in plain English, you are "not ready"—you are exposed.
- Reporting gender pay gaps is the easy part. The hard part is agreeing (and sticking to) robust and explainable pay practices, a clear job levelling methodology and robust governance on who gets to make exceptions.

- Your biggest risk is not the gender pay gap % —it's your pay transparency story, your legacy pay practices, your "special cases" that you cannot explain, quiet market adjustments you undertook in the past but can no longer explain, and the degree of manager discretion practiced within your organisation with no audit trail.
- Start now: clean your hr and pay data, invest in data analytics and reporting capability, ensure robust and explainable job levelling, calibrate salary ranges, define pay exception governance—and write the narrative you want leaders and employees to repeat about your organisation pay practices (because they will tell one either way).

Ireland can debate the shape, scope and sequencing of transposition of the directive into Irish law—but **the pay transparency destination is not optional**.