



**An Coimisiún um
Chosaint Sonraí**
Data Protection
Commission

Data Protection Commission Gender Pay Gap Report 2024

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1. Introduction

The Data Protection Commission (DPC) acknowledges the value of diversity and gender parity in our workplace. At the DPC, we're dedicated to promoting gender equity and building a working environment where everyone has equal opportunities to succeed. We are invested in promoting an equal, inclusive, and diverse workforce and closing the gender pay gap (GPG) within our organisation. This report provides a transparent overview of our gender pay gap and the steps we are taking to address it, outlining our progress towards this goal.

The provision of equal pay between men and women is an issue of significant policy concern. In response to this, the Government passed the Gender Pay Gap Information Act in July 2021. From 2024 onwards all organisations with over 150 employees are required to report on their Gender Pay Gap. The DPC will publish its first GPG report in December 2024 based on 2023-2024 data. This year's report will provide the steady baseline for future tracking of the DPC's GPG.

The Gender Pay Gap Information Act 2021 introduced the legislative basis for GPG reporting in Ireland and requires organisations to report on their hourly GPG.

Organisations with over 150 employees are required to report by selecting a "snapshot" date in the month of June to base their reporting. The snapshot date chosen by the DPC is the 30th of June 2024. A headcount of all employees on this date was carried out and the gender pay information was calculated based on those employees' remuneration between 30th June 2023 and 30th June 2024.

At the snapshot date the DPC had a total of 226 employees with female employees being 55.31% (125) and male employees being 44.69%(101).

The employment profile and the gender pay gap profile for the reporting period are presented in this report. **The DPC has a mean gender pay gap of 7.49% in favour of men and a median pay gap of 2.33% in favour of men.** The report provides an examination of the reported pay gap and the steps being taken to address it.

2. Definitions

Gender Pay Gap (GPG): The gender pay gap is usually represented as the average difference in gross hourly earnings of men and women, expressed as a percentage of men's average gross hourly earnings. A positive gender pay gap indicates that, on average across the employed population, women are in a less favourable position than men. Where the gender pay gap is negative, this indicates the reverse - that, on average, men are in a less favourable position than women.

Relevant date: means the date, in the month of June each year that is selected by a relevant employer for the purposes of the report.

Relevant employee: means a person who is an employee for the purposes of the Employment Equality Act 1998 and is employed by the relevant employer on the snapshot date.

Relevant employer: means an employer with over 150 employees on the snapshot date.

Relevant pay period: means the period of 12 months ending on the snapshot date.

Shift premium pay: means the difference between basic pay and any higher rate paid by the employer for work during different times of the day or night.

Working hours: means the hours when a relevant employee is available, or required to be available, at or near his or her place of employment for the purposes of working, but does not include the hours when the relevant employee is asleep, notwithstanding that the relevant employee, by arrangement, sleeps at or near his or her place of employment and the relevant employer provides suitable sleeping facilities for that relevant employee.

Employee Hourly Rate: The hourly remuneration of an employee is calculated by dividing the employees total ordinary pay in respect of the reporting period by the hours worked for that period. Ordinary pay includes: the normal salary paid to the employee; allowances; overtime; shift premium pay; pay for sick leave; any salary top-ups for statutory leave such as maternity / paternity / parents leave.

Mean Hourly GPG: The mean gender pay gap is the difference in the arithmetic average hourly pay for women compared to men, within our organisation.

Median Hourly GPG: The median gender pay gap is the difference between women's median hourly pay (the middle-paid woman) and men's median hourly pay (the middle-paid man). The median hourly pay is calculated by ranking all employees from the highest paid to the lowest paid and taking the hourly pay of the person in the middle.

Quartiles: Employees were organised into quartiles based on hourly remuneration of all male and female full-time employees: lower, lower middle, upper middle and upper. The proportion of male and female employees in each quartile was expressed as a percentage. There is no requirement to show this information for part-time employees or for temporary employees.

Snapshot Date: Employers to whom the reporting obligations apply are required to calculate and publish the gender pay gap information in respect of relevant persons employed by them on the chosen snapshot date, with the calculations to be based on those employees' remuneration for

the 12-month period that precedes the snapshot date. Employers are required to choose a snapshot date. The snapshot date must be in June but may be any date in June.

Equal pay: The principle of equal pay does not mean that all workers must be paid equally; it means that any pay differences must be based on objective criteria, not related to gender.

Ordinary pay: means the following types of remuneration, payable to a relevant employee, before any statutory deductions are made –

- a) Basic pay,
- b) Allowances,
- c) Pay for piece-work,
- d) Shift premium pay, or
- e) Overtime pay,
- f) Pay for sick leave,
- g) Any salary top-ups for statutory leaves like maternity leave/paternity leave/parent's leave/adoptive leave,
- h) Pay for gardening leave.

But does not include -

- a) Remuneration referable to redundancy or termination of employment, or
- b) Remuneration other than money

Part-time working: A part-time employee in Ireland is defined in law as an employee whose normal hours of work are less than the normal hours of work of an employee who is a comparable employee. For this paper anyone whose full-time employment status (FTE) is less than one is assumed to be working part-time. Part-time does not include anyone who is on or has taken unpaid leave during the reporting period, for example parental leave.

3. Data

3.1 Source of Data

The data for this report was provided by the National Shared Services Office (NSSO) from the DPC's payroll data. The payroll data is sourced through:

- The Human Resources Management System (HRMS), a civil service-wide system that records employee information to enable compilation and analysis of this report, including data on employee gender, employment status, and workshare patterns.
- The Makodata payroll software used by the NSSO and the DPC Finance Team provided pay information relevant to the reporting period, including data on ordinary pay.

After the data from the two aforementioned systems was examined, the necessary computations and compilations could be completed.

3.2 Adjustments and approximations

On the snapshot date of 30th June 2024 the total headcount of the DPC was 226. The employee breakdown is the source of the report's metrics, which show the percentage of male and female employees on the snapshot date.

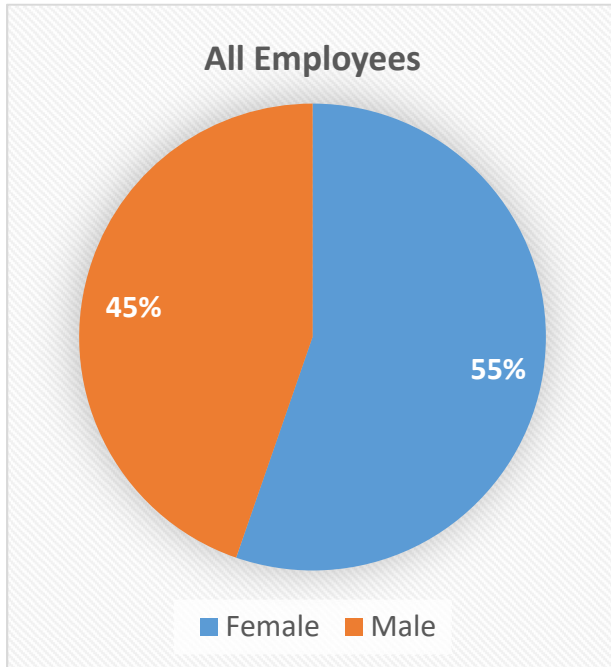
- Employees on unpaid leave, such as career breaks (i.e. employees who are on career breaks for over 12 months), who have received no pay during the reporting period are included in the headcount, but not included in the report.
- Employees on secondment to the DPC but paid by other organisations are not included in this report.
- Employees on sick leave are included in the report.

3.3 Data Protection

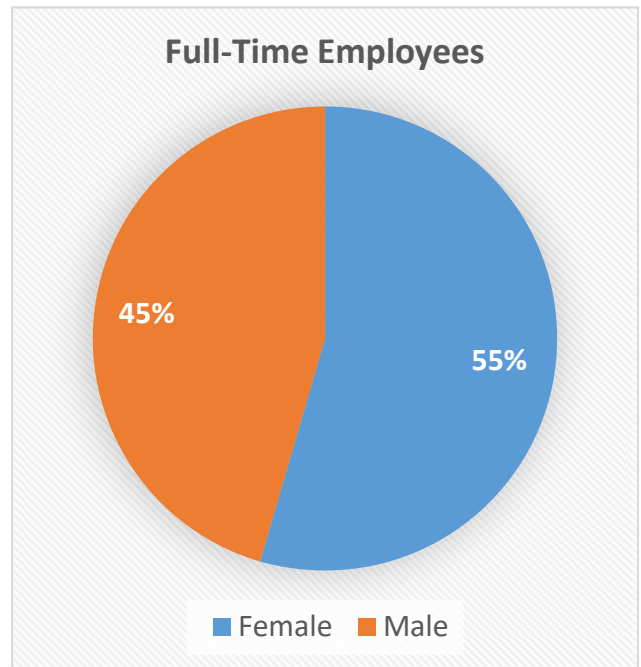
The data was compiled by members of the People & Learning unit in conjunction with officers from the DPC Finance team who provided the information through Payroll Shared Services section of the NSSO and in line with Data Protection obligations. All data used for producing this report was processed by employees who would have access to the data as part of their daily duties within the People & Learning Unit of the DPC. All statistics provided in this report are combined and do not identify individuals.

4. Employment Profile

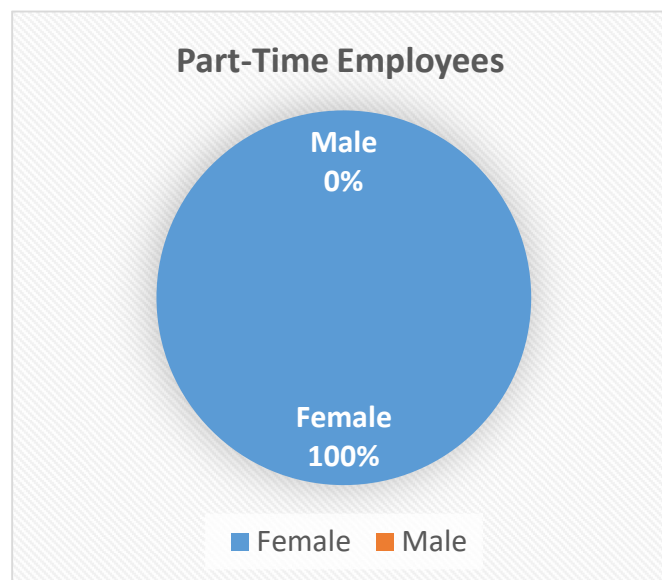
On 30 June 2024 there were 226 employees in the DPC.



All Employees – 226
125 Females, 101 Males



Full-Time Employees – 222
121 Females, 101 Males

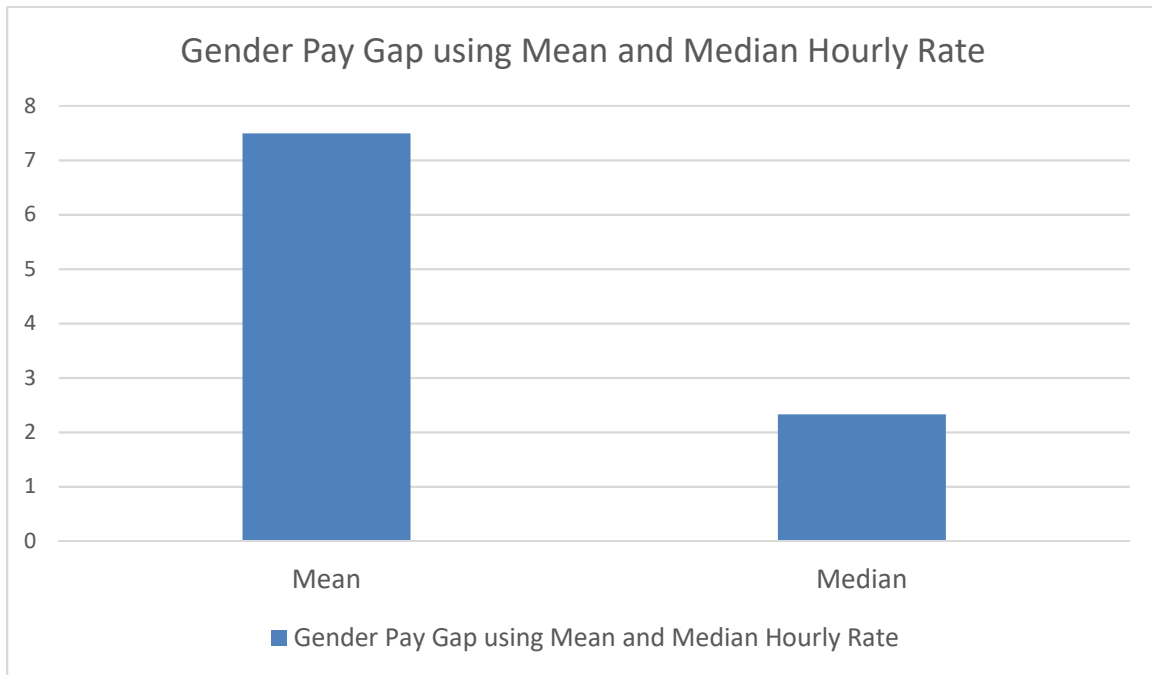


Part-Time Employees – 4
4 Females, 0 Males

5. Gender Pay Gap Profile

The GPG is the difference in the average hourly wage of males and females across a workforce. It does not take into account any other factors (for example, years of service, grade or any period of statutory leave).

The GPG using the mean hourly rate for the reporting period was 7.49% in favour of male employees. The GPG using the median hourly rate was 2.33% in favour of male employees.



The Gender Pay Gap Information Act 2021 requires organisations to provide the **Mean Gender Pay Gap %** and the **Median Gender Pay Gap %** across three different categories:

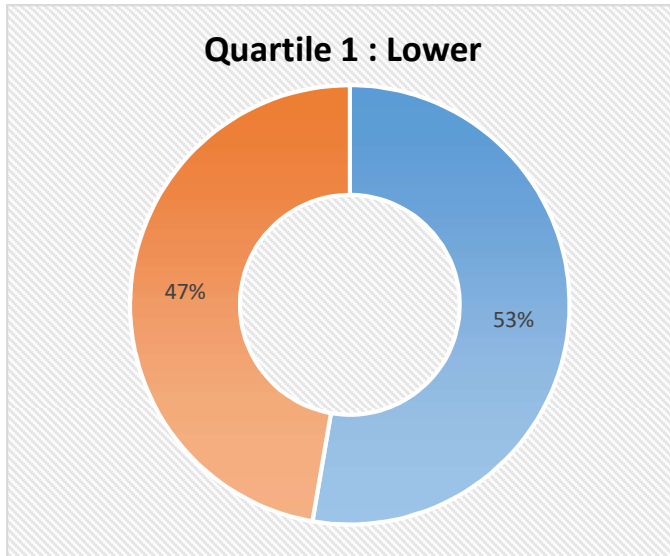
- All Employees
- Part-Time Employees
- Temporary Employees

	Gender Gap in Hourly Remuneration			
	Mean	%	Median	%
All Employees		7.49%		2.33%
Part Time Employees		-8.90%		-7.20%
Temporary Employees		-3.49%		-3.16%

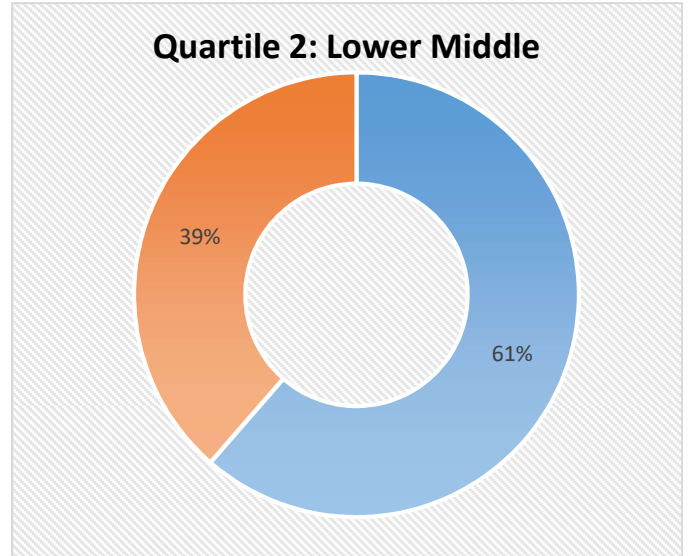
Gender Breakdown by Quartile

Employees were organised into quartiles based on hourly remuneration of all male and female full-time employees: lower, lower middle, upper middle and upper.

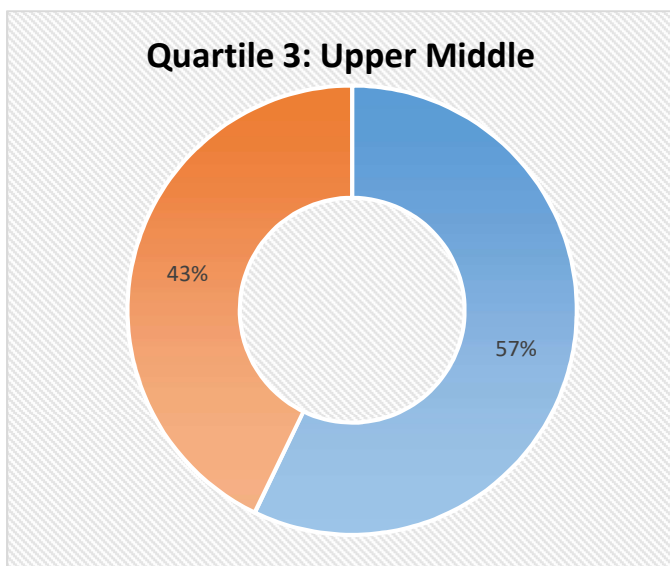
The proportion of male (in orange) and female (in blue) full-time employees in each quartile was expressed as a percentage. There is no requirement to show this information for part-time or temporary employees.



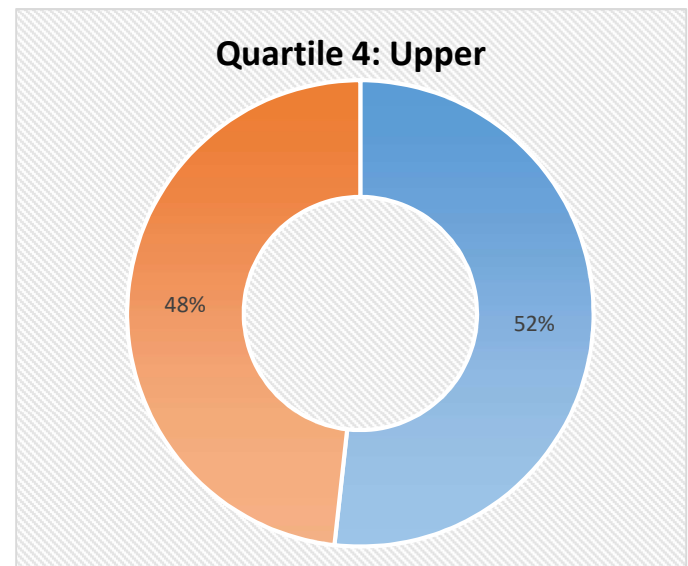
Quartile 1: 55 Employees
29 Female | 26 Male



Quartile 2: 57 Employees
35 Female | 22 Male



Quartile 3: 56 Employees
32 Female | 24 Male



Quartile 4: 56 Employees
29 Female | 27 Male

6. Analysis

Reasons for the differences relating to remuneration that are referable to gender.

Men and women in the same roles at the DPC are paid equally, however there is a mean gender pay gap of 7.49% and a median gender pay gap of 2.33%.

- The gender pay profile is linked to, and impacted by, the timing of an employee's joining date, leaving date, mobility and promotional activity.
- Overtime or any allowances, when required is offered to eligible grades equally. In the DPC the data shows that there was no payment for overtime for any of our employees in the relevant period.
- There are 68.75% of male and 31.25% of female representation at the grade of Principal Officer or equivalent and in higher grades for this reporting period. This contributed to the pay gap as there were more males in these grades and males were on higher points of their respective pay scales due to longer service at these grades.

7. Measures to Address the Gender Pay Gap

Recruitment

Publicjobs, the centralised provider of Civil Service recruitment, has to date handled the majority of the DPC's hiring needs. Diversity is acknowledged and valued by the DPC and the Civil Service as a whole and Publicjobs work to draw diverse talent towards careers in the civil and wider public service. The Publicjobs Statement of Strategy, Nua 2026, lays out a number of initiatives aimed at making sure the public service is representative of the society it serves. In addition to leading the creation and actively assisting in the development of recruitment-related networks for minority, marginalised, and underrepresented groups, they hope to be acknowledged as a thought leader in the fields of attraction, recruitment, and selection, influencing inclusive practices in the public sector.

All internal competitions in the DPC are conducted in line with the Code of Practice as set out by the Commission of Public Service Appointments (CPSA) to ensure that a fair and equal process is followed throughout. We aim to keep our interview boards gender-balanced and provided with full training that incorporates equality, diversity and inclusion (EDI) training to facilitate a selection process free of conscious or unconscious bias.

Equality, Diversity and Inclusion

The DPC has prioritised the promotion of a positive, inclusive workplace culture. The goal is to engage with colleagues and to identify various initiatives that continue to promote EDI so that we can have a more equal and diverse workplace. In 2024, the DPC established its Equality,

Diversity and Inclusion (EDI) Committee. The EDI Committee is committed to fostering a workplace culture that celebrates and leverages the unique perspectives and experiences of all colleagues in the DPC. The work of the EDI Committee and any EDI action plan it develops will form an important part of an overall DPC People Strategy and will contribute to the DPC's implementation of the 'Workforce of the Future Pillar' of the Public Service Transformation 2030 Strategy.

Flexible and Blended Working

The Data Protection Commission (DPC) is committed to embracing opportunities for remote and blended working, to build a more dynamic, agile and responsive workforce, while sustaining strong standards of performance and high levels of productivity. The DPC believes that blended working can increase flexibility, improve health and wellbeing, and enhance work-life balance while also delivering on the exigencies of the regulatory remit it has.

In 2022, the DPC Blended Working Policy was introduced which allows for its employees to apply to work up to 60% of their working week remotely. In addition, flexitime was also re-introduced in 2023 and allows eligible employees to avail of flexible working. All employees are eligible to apply for work sharing opportunities, regardless of grade.

The People & Learning team through its HR clinics and employee induction programmes run a series of information sessions designed to inform colleagues of the different leave types available, which included a session on family-friendly leave options and how they can be accessed.

Menopause Policy

The DPC is committed to fostering an inclusive and supportive workplace where all employees are treated with dignity, respect, and understanding, and where their health and wellbeing are prioritized. Recognizing the impact of menopause on employees, the DPC has published a menopause policy as part of its ongoing efforts to promote dignity, respect, inclusivity, and gender equality in the workplace. This policy aims to raise awareness of menopause, provide guidance on workplace adjustments, and outline the supports available to employees experiencing menopausal symptoms.

Aligned with the Menopause in the Workplace Policy Framework for Civil Service Organisations and the Employment Equality Acts 1998–2021, the policy ensures support for all those experiencing menopausal symptoms. It emphasizes creating a culture where employees feel comfortable discussing symptoms, requesting adjustments, and accessing resources, including healthcare signposting and reasonable accommodations.

Data Analysis and Qualitative Research

The Department of Public Expenditure, NDP Delivery and Reform (DPENDPDR) centrally and uniformly sets the pay rates and terms and conditions for all civil servants. This allows for a certain amount of transparency and governance regarding pay-related issues, but it also means that the DPC has no authority to alter the terms and conditions of its employees. However, the DPC is fully committed to continuing to develop and iterate our robust policies and supports, making sure they are promoted, understood, and are functioning effectively to ensure they contribute to our aim to narrow the gap between mean and median rates for female and male employees.

Interdepartmental Networking

The DPC People & Learning Unit participates in various Interdepartmental networks to share and develop key learnings and best practice, e.g. Interdepartmental L&D network, EDI network, Disability Liaison Officer Network, Public Sector HR Leaders network etc.

8. Conclusion

Through its own actions and through the shared learning on relevant initiatives being promoted across the civil and wider public service, the DPC intends to continue to implement appropriate actions to assist in addressing the gender pay gap.

The DPC looks forward to working with its employees on these issues in the time ahead.