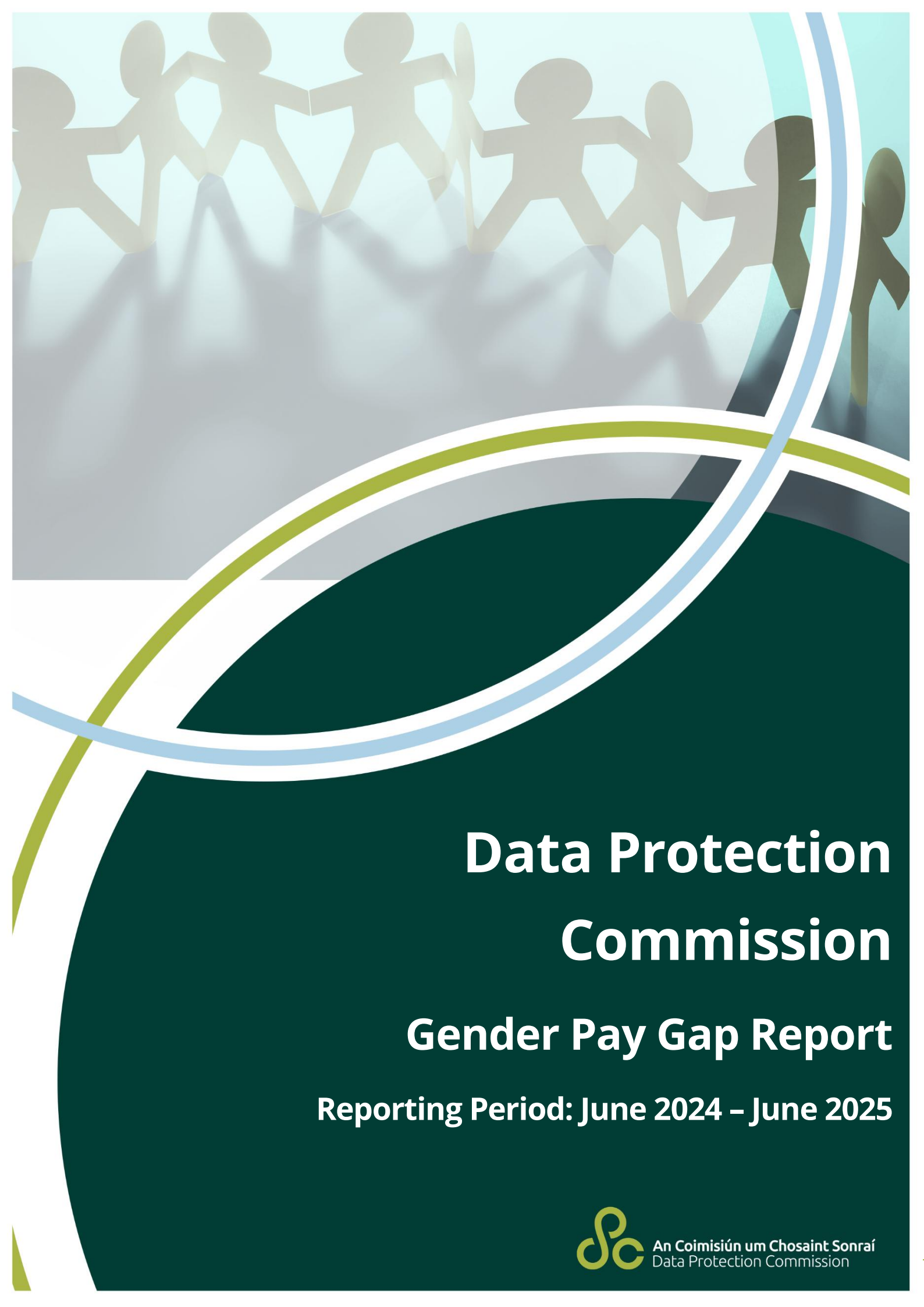




Data Protection Commission

Gender Pay Gap Report

Reporting Period: June 2024 – June 2025

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1. Introduction

The Data Protection Commission (DPC) remains committed to fostering diversity, equity, and gender parity in its workplace. We are invested in promoting an equal, inclusive, and diverse workforce and closing the Gender Pay Gap (GPG) within our organisation. This report provides an overview of the DPC's Gender Pay Gap (GPG) for the year 2025 in accordance with the Gender Pay Gap Information Act 2021¹.

The DPC is publishing its second GPG report in November 2025 based on 2024-2025 data.

The snapshot date for the DPC this year is the 20 June 2025. A headcount of all employees on this date was carried out and the gender pay information was calculated based on those employees' remuneration for the 12-month period ending 20 June 2025. The employment profile and the gender pay gap profile for this reporting period are presented in this report.

At the snapshot date the DPC had a total of 272 employees with female employees being 54.40% (147) and male employees being 45.95% (125).

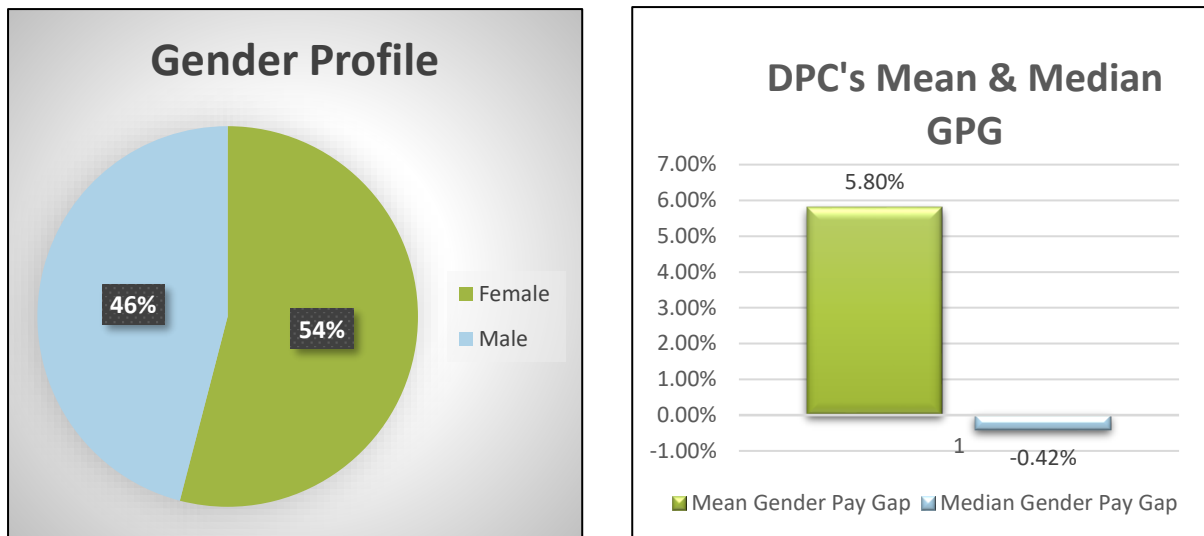
For the reporting period, the DPC has a mean gender pay gap of **5.80%** in favour of men and a median pay gap of **-0.42%** in favour of women. The report provides an examination of the reported pay gap and the steps being taken to address it.

The DPC is dedicated to continuous progress on equality, inclusivity, and closing the gender pay gap. The report reflects our sustained approach, underpinned by national policy and evolving legislative requirements.

Key Highlights

- Total Employees: 272 (147 Female, 125 Male)
- Female Workforce Representation: 54%
- Mean Gender Pay Gap: 5.80% (in favour of men)
- Median Gender Pay Gap: -0.42% (in favour of women)

¹ [Gender Pay Gap Information Act 2021](#)



2. Definitions

1. **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.
2. **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.
3. **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.
4. **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.

5. **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.
6. **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.
7. **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.
8. **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.
9. **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.
10. **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.
11. **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.

12. **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.

13. **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.

14. **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

15. **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 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 20 June 2025, the total headcount of the DPC was 272. 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.

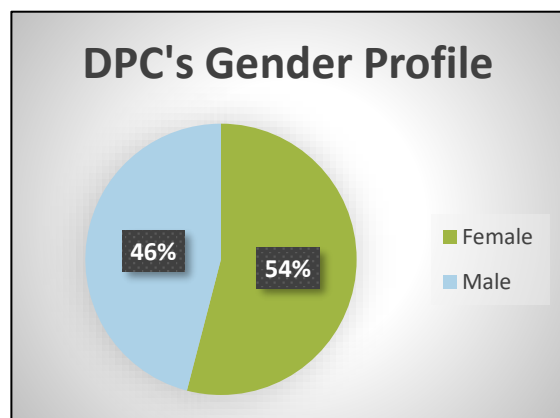
3.3 Data Protection

The data was compiled by members of the People & Learning Unit in conjunction with officers from at the 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.

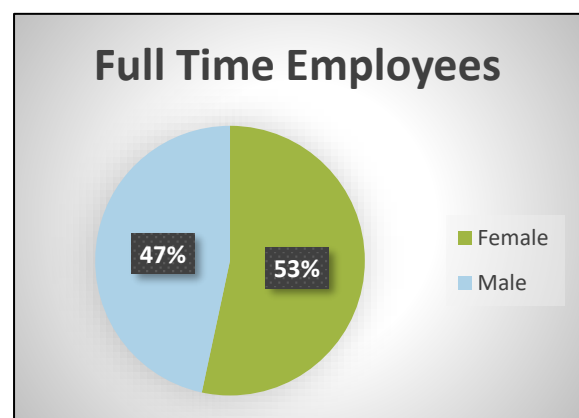
4. Employment Profile

The DPC's gender profile currently stands at 54% female workforce and 46% male workforce.

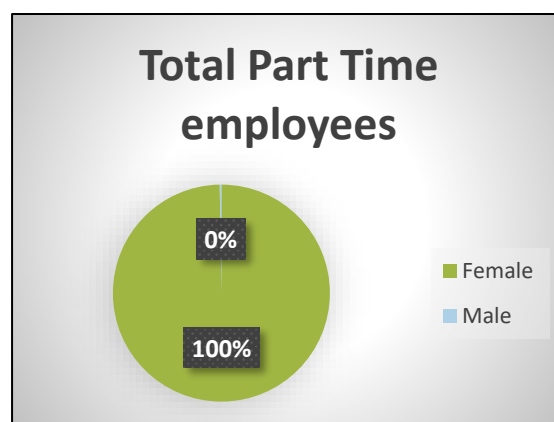
As of the snapshot date, the DPC employed **272 people**.



Total employees= 272.
147 Females & 125 Males



Full-Time employees = 268
143 Females & 125 Males



Part-Time Employees = 4
0 Male & 4 Females.

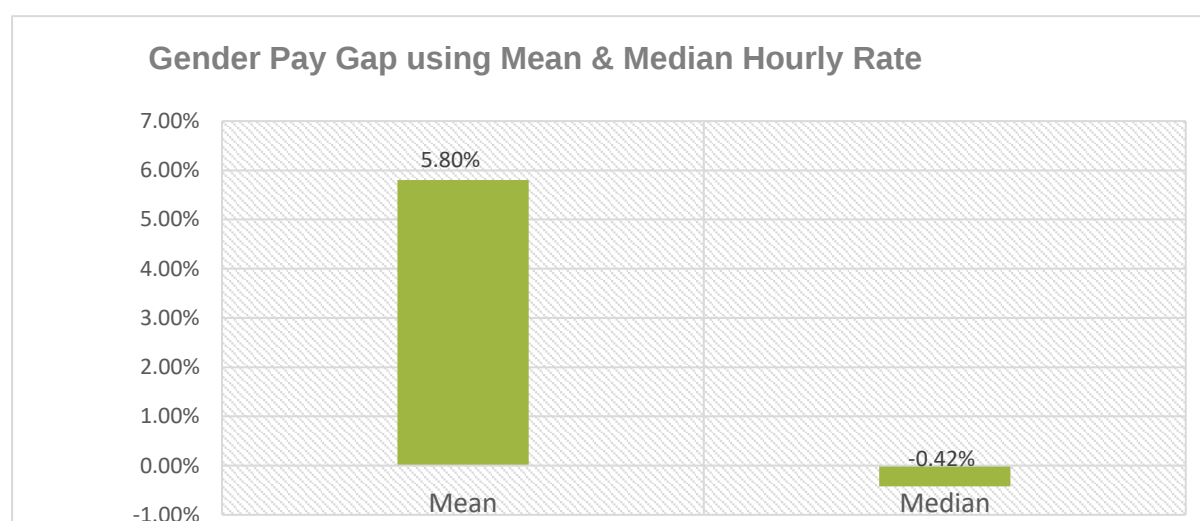
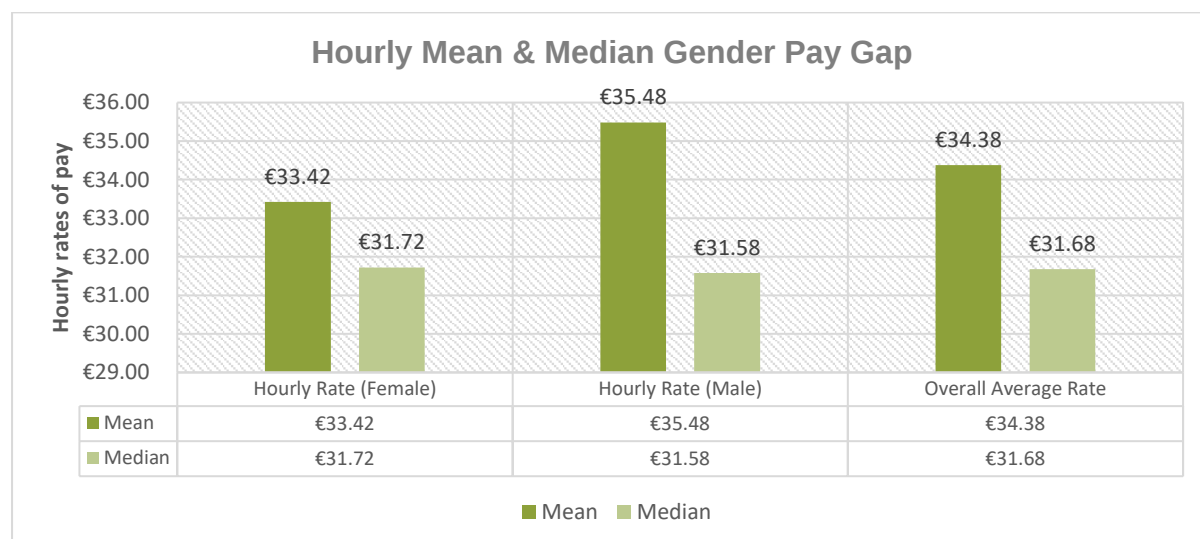
5. Gender Pay Gap Profile

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 5.80% in favour of male employees. The GPG using the median hourly rate was -0.42% in favour of female employees

The DPC reports the following gender pay gap metrics for 2025:

Gender Pay Gap Hourly Mean & Median Comparison Chart



Key Findings

- **Mean Gender Pay Gap:** 5.80%, meaning the average pay for women is 5.8% lower than for men.
- **Median Gender Pay Gap:** -0.42%, signifying women's median hourly pay is marginally higher than men's.

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

- All Employees
- Part-Time Employees
- Temporary Employees

	Gender Pay Gap in Remuneration			
	Mean gap (€)	Mean %	Median Gap (€)	Median %
All Employees	2.06	5.80%	-0.14	-0.42
Part Time Employees*	N/A	N/A		N/A
Temporary Employees	N/A	N/A		N/A

*All four part-time employees are female with no male part-time employees to compare with therefore the mean and median pay gap for part-time employees is undefined.

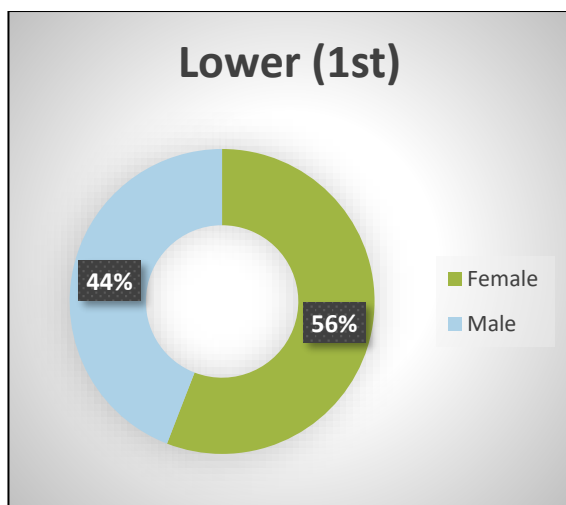
6. Gender Breakdown by Quartile

Quartile breakdowns provide a snapshot of the gender representation at each pay level. The analysis uses equal employee splits per quartile to understand distribution across pay bands.

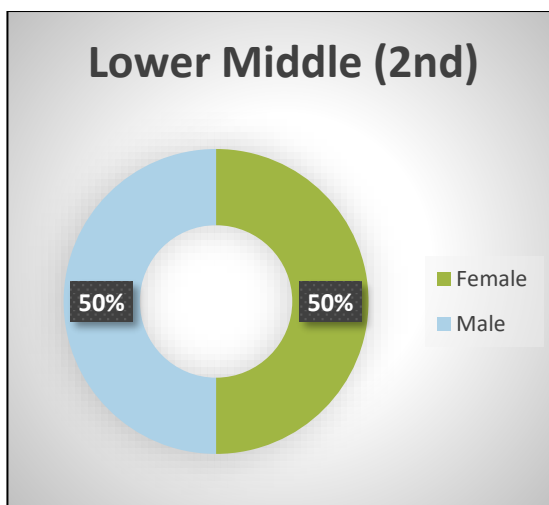
Employees were organised into quartiles based on hourly remuneration of all male and female full- time employees: lower (1st), lower middle (2nd), upper middle (3rd) and upper (4th).

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.

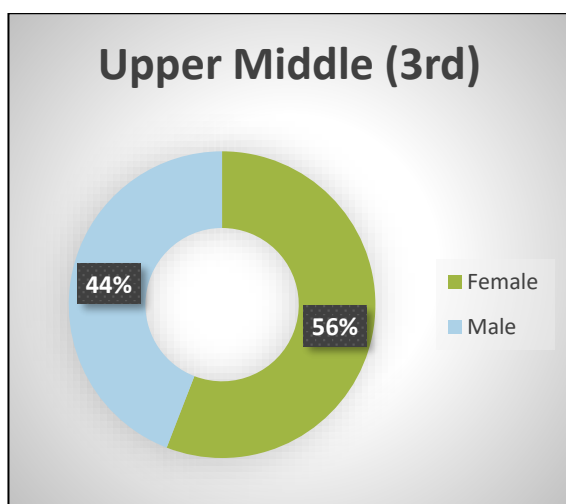
Quartile Analysis



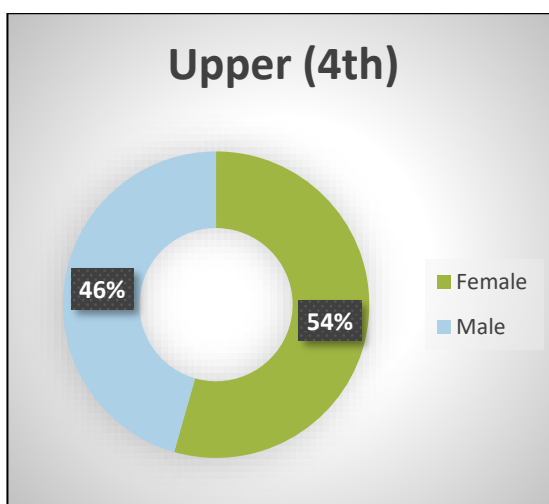
Quartile 1: 68 Employees
38 Female | 30 Male



Quartile 2: 68 Employees
34 Female | 34 Male



Quartile 3: 68 Employees
38 Female | 30 Male



Quartile 4: 68 Employees
37 Female | 31 Male

7. Analysis

Men and women in the same roles at the DPC are paid equally.

Headline Gender Pay Gap: The mean gender pay gap is 5.80%, which is a significant improvement from last year when the mean gender pay gap was 7.49% in favour of men. The median gender pay gap, at -0.42%, suggests the pay gap is marginal at the midpoint of the pay distribution and in favour of women this year. This is also significant improvement from last year when the median gender pay gap was 2.33% in favour of men.

Key Contributors:

- 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. Overtime was not offered to any staff of the DPC in the relevant period.
- For the reporting period there were a total of 21 staff in Principal Officer (PO) and higher grades, of which 13 are male and eight females. 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.
- For the reporting period, the DPC had one female promoted to Assistant Principal Officer (AP) and three females promoted to PO versus only one male promoted to PO this year and no male promoted to AP.
- The DPC appointed six new female APs and two male APs this year.
- Three female Higher Executive Officer (HEO) exited the organisation in the reporting period.
- Overall, more female than male staff joined the DPC during the reporting period compared to the previous reporting period when more male than female staff joined. 40 new female staff joined in this reporting period compared to 25 new female staff in the previous reporting period.

8. Measures to address the Gender Pay Gap

The DPC has implemented comprehensive measures across multiple areas to address gender pay disparities and promote workplace equality.

Recruitment

Objective: Ensure fair, equitable and inclusive recruitment processes.

Key Measures:

- All internal and external competitions run in accordance with the Code of Practice for Appointment to Positions in the Civil Service and Public Service².
- Publicjobs, the centralised provider of Civil Service recruitment, has to date handled the majority of the DPC's external hiring needs. Diversity is acknowledged and valued by the DPC and the Civil Service as a whole and Publicjobs works to draw diverse talent towards careers in the civil and wider public service. The Publicjobs Statement of Strategy, Nua 2026³, 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.
- Interview boards maintain balanced gender representation.
- Training provided to the interview board includes a significant focus on a range of important grounds under Employment Equality legislation⁴, and recognising and avoiding 'unconscious bias', including any gender related bias, is part of that training.

² [Code of Practice for Appointment to Positions in the Civil Service and Public Service](#)

³ [Publicjobs Statement of Strategy, Nua 2026](#)

⁴ [Employment Equality legislation](#)

Equality, Diversity and Inclusion

Strategic Approach: The DPC is embedding an inclusive, diverse, and equitable culture across our organisation, led by our dedicated Equality, Diversity and Inclusion (EDI) Committee, which represents all grade levels. This work aligns with the Civil Service Renewal 2030 Strategy ⁵and the DPC's Regulatory Strategy⁶.

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.

Key Initiatives:

- Dedicated EDI Committee representing all staff with the Chair being a member of the Senior Management Committee.
- Multiple initiatives undertaken and promoted by the EDIC and the People & Learning Unit to embed inclusive culture at the DPC.
- Dedicated budget for EDI initiatives, attending conferences, inviting external speakers, running awareness sessions and relevant training.
- Support networks and employee resources and supports for example CSEAS, Office of the CMO, LGBTQ+ support network
- Dedicated policies for example the DPC's Menopause policy which follows the Civil Service Menopause framework⁷.
- A podcast with female POs from the organisation sharing their experiences, challenges and opportunities during their career.
- International Women's Day Quiz was organised to celebrate achievements of women across the globe.
- A number of DPC colleagues attended the Department of Foreign Affairs' International Women's Day Event.
- Ongoing promotion and implementation of a range of family friendly and work-life balance policies.

⁵ [Civil Service Renewal 2030 Strategy](#)

⁶ [DPC's Regulatory Strategy](#)

⁷ [Civil Service Menopause framework](#)

Work Life balance

Aim: To promote work-life balance and equal opportunities building a more dynamic, agile and responsive workforce, while sustaining strong standards of performance and high levels of productivity.

Established Policies:

- DPC's Blended Working Policy developed under the Civil Service Blended Working Policy Framework⁸.
- Flexitime arrangements as per the DPC's Flexible Working Policy.
- Worksharing opportunities through the Civil Service Work Sharing Scheme⁹
- Shorter Working year scheme¹⁰
- Family-friendly policies like Parental leave¹¹, Parents Leave¹², Carer's leave¹³, Paternity Leave¹⁴ & Maternity leave ¹⁵

Benefits:

- Improved employee engagement
- Better and more equal opportunities for, and reduced barriers to career progression/advancement.
- 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 includes a session on family-friendly leave options and how they can be accessed.

⁸ [Civil Service Blended Working Policy Framework](#)

⁹ [Civil Service Work Sharing Scheme](#)

¹⁰ [Shorter Working year scheme](#)

¹¹ [Parental leave](#)

¹² [Parents Leave](#)

¹³ [Carer's leave](#)

¹⁴ [Paternity Leave](#)

¹⁵ [Maternity leave](#)

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 prioritised. Recognising 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 ¹⁶ and the Employment Equality Acts 1998–2021, the policy ensures support for all those experiencing menopausal symptoms. It emphasises creating a culture where employees feel comfortable discussing symptoms, requesting adjustments, and accessing resources, including healthcare signposting and reasonable accommodations.

Support Measures:

- Workplace adjustments and reasonable accommodations
- Access to Employee Assistance Services through Civil Service Employee Assistance Service (CSEAS)¹⁷
- Dedicated Disability Liaison Officer to support all staff.
- Health and wellbeing initiatives
- Awareness initiatives and manager training
- Robust Dignity at Work policy¹⁸
- Periodic health check-ups

¹⁶ [Menopause in the Workplace Policy Framework for Civil Service](#)

¹⁷ [Civil Service Employee Assistance Service \(CSEAS\)](#)

¹⁸ [Dignity at Work policy](#)

Data Analysis and Qualitative Research

The Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation 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.

At the DPC we intend to take an evidence-based approach to embed the culture of equity.

Key areas that the DPC analyses from time to time informs further decision making includes:

- Workforce data analysis for strategic workforce planning purposes by grade, role, and progression
- Policy and practice reviews (internal and external)
- Engagement within networks to understand underlying contributors across the civil service.
- Analysis of the uptake and impact on strategic workforce planning of career breaks, shorter working year, work sharing schemes and promotion patterns.
- Benchmarking against comparable organisations

Interdepartmental Networking

The DPC takes a collaborative approach through shared learnings from the public and civil service sector's best practice

Network Participation in the following:

- Interdepartmental HR networks
- EDI professional communities and groups like the EDI network, Pride networks, LGBTQ+ network etc.
- Interdepartmental Learning & Development Network
- Digital Regulators Group HR Managers network
- Economic Regulators Group network
- Civil Service Wellbeing Network
- Interdepartmental Recruiters Network
- Disability Liaison Officer Network

9. Conclusion

The 2025 Gender Pay Gap Report reaffirms the DPC's ongoing commitment to equality, diversity, and inclusion. The results demonstrate progress while highlighting areas for continued focus:

Key Achievements

- **Improved Results:** Mean GPG of 5.80% compares favourably to last year's Mean GPG which was 7.49%. The Median GPG stands at -0.42% this year. This has significantly improved and is in favour of women in comparison to last year when the Median GPG was 2.33%.
[\(See appendix for GPG 2024\)](#)
- **Workforce Representation:** 54% female representation across the organisation.
- **Comprehensive Framework:** Multi-faceted approach to addressing pay gaps
- **Strong Foundation:** Robust policies and support structures in place

Areas for Continued Focus

- **Grade Distribution:** Aiming for reasonably balanced representation across all levels
- **Career Progression:** Supporting advancement opportunities for all employees
- **Systemic Factors:** Researching, analysing and addressing any identified structural inequalities
- **Continuous Monitoring:** Regular review and refinement of measures

Future Commitments

The DPC remains committed to:

- Transparent reporting and accountability
- Evidence-based policy development
- Collaborative approach to equality challenges
- Continuous improvement in workplace practices
- Leadership in public sector equality initiatives

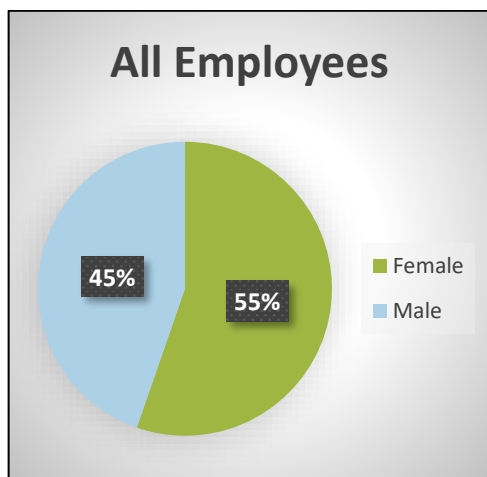
The GPG, while encouraging, reinforces the importance of sustained vigilance and systematic action. Through continued implementation of comprehensive measures addressing recruitment, EDI, flexible work, menopause support, and peer collaboration, the DPC will continue to work towards eliminating pay disparities and creating an inclusive workplace for all employees.

APPENDIX:

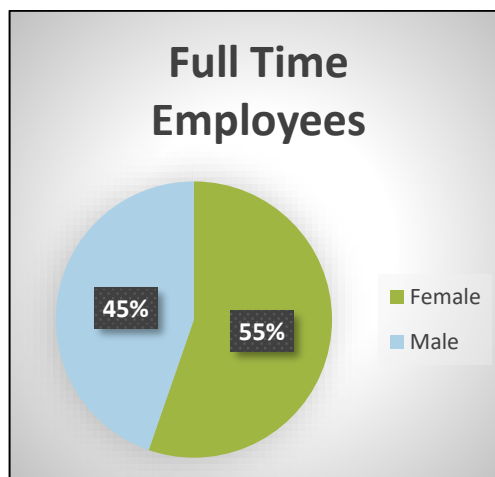
Comparison with 2024 Gender Pay Gap – Statistics

2024

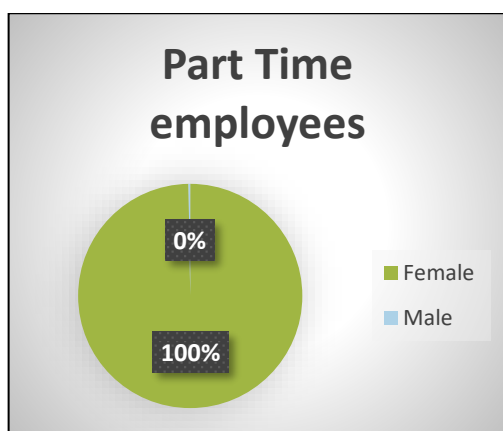
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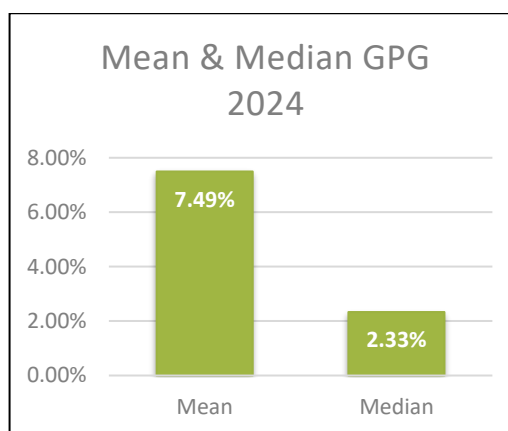
All Employees – 226
125 Females, 101 Males



Full Time Employees – 222
121 Females, 101 Males



Part-Time Employees – 4
4 Females, 0 Males



Mean & Median GPG