



Gender Pension Gap

Analysis of Status and Progress of the Recommendations made in the *Report on Gender Pension Gap, 2022*.

Category 1: What Has Been Achieved

Number	Original Recommendation	Status	Further Action Required
1	<i>“Roll out the Auto-Enrolment (“AE”) Scheme at the earliest opportunity”</i> <i>“This step will have the most immediate impact on reducing the gap which currently prevails.”</i>	AE commenced on 1 January 2026 with over 830,000 eligible employees enrolled into MyFutureFund.	This is to be welcomed but further actions could be taken in the context of the AE framework to target women. See recommendations 2, 10, 12, and 13 below.
10	<i>“Offer a lifestyle strategy within AE that is diversified and not overly conservative”</i> <i>“The Pensions Council agreed that in the AE Scheme, it is important to implement a suitable default strategy. A default lifestyle investment strategy that is diversified and not overly conservative along with inertia may</i>	AE offers a lifestyle investment strategy as the default option to all participants. Participants’ investments are placed in certain strategies based on their age / years from retirement. • 15+ years from retirement means investments are placed in the high-risk strategy, • 15-5 years from retirement	Recommendation: Support with no further suggestions. The design of the default investment strategy as an automatic life styling product linked to age (as a predictor of years from retirement) is welcomed as a strategy which will increase the return on investment for women joining at a younger age, allowing for compounding of these greater returns over the women's career and periods spent



	<i>improve retirement outcomes for women.”</i>	means investments are moved to the medium risk, and • less than 5 years from retirement moves investments to the low-risk strategy.	working in the home, while also protecting women closer to retirement age from high risk investments. While the design of the default investment strategy as an automatic life styling product is welcomed, we note there may be merit in reviewing whether the current de-risking path is overly conservative for some members and whether greater exposure to growth assets could be maintained for longer in the default strategy. (Low impact on closing the gap).
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Category 2: Relatively Simple to Achieve

Number	Recommendation	Status	Further action required
12	<i>“Consider a focussed campaign at the launch of the AE Scheme”</i> <i>“The Pensions Council is of the view that private companies are sufficiently active in promoting retirement saving and calling people to action. Therefore, a time-limited national campaign to raise pension awareness would be of limited use. However, a more focussed campaign, tied in with the launch of the AE Scheme, may be appropriate.”</i>	A 3-phase national communications campaign for AE took place over the course of 2025, targeting all employers in Ireland. It included print, radio, TV and social media advertising. It focused on calling attention to the role employers have in being compliant with AE. The Department of Social Protection held regular webinars and outreach programmes for employers, payroll providers and representative groups. In tandem with this, pension providers used the opportunity of the rollout of AE to promote existing occupational pensions and alternative pension provision through Personal Retirement Savings Accounts (PRSAs).	While a substantial communications campaign accompanied the rollout of AE, we have not identified any dedicated campaign elements targeted at women, women in caring roles or other groups disproportionately affected by pension inequality which structurally include a majority of women. Recommendation: We recommend a focussed campaign targeting women, promoting retirement savings and investments, potentially tied to the one-year anniversary of the roll-out of AE with emphasis on the specific retirement savings challenges faced by women, including lower lifetime earnings, career breaks and caring responsibilities. Future



			communications should also include targeted messaging, where possible, designed to address the specific pension challenges experienced by women. (Low impact on closing the gap).
13	<i>“Implement a central online information hub with targeted communications”</i> <i>“It is important that any messages explaining AE and Special Savings Incentive Account (SSIA) -style (if applicable) top up incentives are tailored towards women. This could be done on an ongoing basis via a central information hub (including easy-to-use online tools).”</i>	A centralised hub (Auto-enrolment) has been created that includes all necessary basic information regarding AE. The MyFutureFund website also includes additional, more detailed information on AE (MyFutureFund).	While a central online information hub has been established, the Council’s recommendation that communications be tailored towards women does not appear to have been implemented. We have not identified any dedicated women-focused content within the auto-enrolment awareness campaign or information hub. Recommendation: We recommend a women-focussed section of the centralised hub be created on the MyFutureFund website. (Low impact on closing the gap).



2	<i>“Refine the AE Scheme earnings trigger and how it will change over time”</i> <i>“The AE Strawman consultation document proposed an “earnings trigger” of €20,000 per annum, meaning that only people with an annual income above this threshold will be automatically enrolled into the scheme. The Minister could consider the following refinements:</i> <i>• automatically include everyone in the AE Scheme if they pay income tax; or</i> <i>• only include people who are not in receipt of another Social Welfare Benefit, such as Working Family Payment; or</i> <i>• set the earnings trigger to be the Working Family Payment income limit; or</i> <i>• consider a lower level of qualifying earnings or remove the earnings</i>	AE was designed and rolled out on the basis of an earnings trigger of €20,000 per annum. The refinements recommended were not made.	Recommendation: We recommend redesigning the AE earnings trigger in line with the original recommendation to ensure more women are captured within AE. This would represent a direct and potentially highly impactful step towards closing the gender pension gap. (High impact on closing the gap)
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	<i>threshold with clear communication on the ability to opt out; and/or</i> <i>link the earnings trigger automatically to a relevant earnings or inflation index, so that it moves in smaller steps in a more regular and automated fashion than a 5-yearly review.</i> <i>By taking these steps, AE would automatically include more women."</i>		
3	<i>"Set a maximum waiting period for membership of occupational pension schemes"</i> <i>"In a modern, technology-driven environment, the administrative burden of enrolling a new member into an employer's pension scheme may not be as onerous as it might have been. In addition, employers also have to offer employees access to at least one standard PRSA if the waiting</i>	The position remains that there is no maximum overarching waiting period set out in the Pensions Act 1990 (as amended) (the "Pensions Act") for membership of an occupational pension scheme. Section 39A of the Pensions Act prescribes a maximum waiting period of no greater than 12 months for outgoing workers, and Section 121 requires employers to offer PRSA access where a waiting period for membership of an	Recommendation: We recommend removing waiting periods altogether. While this change would require an amendment to primary legislation, the existing legislative framework already implicitly reflects a policy preference for early access to retirement savings. A targeted legislative amendment would give explicit and



	<i>period is longer than 6 months, meaning that additional administration burdens apply for longer waiting periods. Indeed, the introduction of AE may mean that there is a further administrative burden if there is any waiting period at all. Therefore, the only benefit of a waiting period to employers is likely to be the reduced cost for newer employees. Consideration could therefore be given to imposing a maximum waiting period (or remove it altogether). Where waiting periods are reduced, this will mean that more people, including women, are saving for retirement.”</i>	occupational pension scheme exceeds 6 months. Since the introduction of AE, if employees meet the criteria for enrolment during a waiting period, they will be automatically enrolled into MyFutureFund as soon as they are deemed eligible.	enforceable effect to that preference, reduce the administrative complexity that arises from operating parallel access obligations for longer waiting periods, and broaden pension coverage across the workforce. In particular, such an amendment would disproportionately benefit those with shorter or interrupted employment tenures, including women. In practice, as a result of the introduction of AE, we understand many employers have already abolished waiting periods and offer employees immediate access to pension and benefit arrangements. (Medium impact on closing the gap).
4	“Reduce the vesting period” <i>“The maximum two-year period associated with the vesting period is somewhat arbitrary. It has even</i>	No actions have been taken and the position remains unchanged. The two-year vesting period applying to occupational pension schemes prescribed under Part III	Recommendation: Noting that no equivalent vesting period applies to employer contributions and the State top-up in MyFutureFund, we recommend the Pensions Act be



	<i>less relevance as it only starts when the person actually joins the employer's pension scheme. If the period was to be reduced (or eliminated), this would mean that fewer people would take a refund of the value of their pension contributions and would therefore have some level of retirement savings, all else being equal. They would also benefit from the value of employer contributions paid into the scheme on their behalf. This suggested change could benefit women, as they may be more likely than men to have periods of short service."</i>	of the Pensions Act not been reduced or eliminated.	amended to eliminate the vesting period applying to occupational pension schemes entirely, in order to introduce consistency and level the playing field by ensuring women in both occupational pension schemes and MyFutureFund are not adversely affected by vesting periods. In practice, as a result of the introduction of AE, we understand some employers have abolished the vesting period as part of the amendments introduced in response to the introduction of AE. (Medium impact on closing the gap)
11	"Introduce further disclosure requirements at key events or on an ongoing basis" <i>"In the context of protecting women who are married or in a civil partnership, a practical step that could be taken would be to update the Disclosure of</i>	No actions have been taken and the position under the regulations remains unchanged. Proactive disclosure to non-member spouses is not required when a member a) leaves employment, and b) at key decision points that may materially affect their interests, in particular, where a member elects to transfer	Recommendation: The Disclosure of Information Regulations 2006 be amended to require trustees to proactively furnish non-member spouses with relevant information at key events other than retirement or death of a member, including, but not limited to, the member leaving service



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	<i>Information Regulations 2006 to require pension providers to give information to non-member spouses at key events, such as leaving or retirement, or on an ongoing basis.”</i>	their defined benefit entitlements, draw down defined contribution benefits at retirement, or takes any other option in respect of which the non-member spouse has no formal right to be informed or consulted. These are moments at which a non-member spouse’s prospective entitlements may be diminished or lost, and at which timely information would be of greatest practical value.	and electing to exercise any option in respect of their retirement benefits. (Medium impact on closing the gap)
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Category 3: Requiring Significant Work or Investment to Achieve

Number	Recommendation	Status	Further action required
5	“Apply the State top-up to all AE members” <i>“The Minister could consider offering the SSIA-style incentive to all members of the AE Scheme, not just employees. As an alternative, the incentive could be targeted specifically at women, by linking it to home caring periods or child benefit payments, for example. This would improve retirement outcomes for those who are not in paid employment/self-employment and who may be more likely to be women. To manage costs incurred by the State, this could be done using a notional earnings level, for example, aligned with the earnings trigger. To ensure the incentive is attractive to those on lower earnings, the State contribution could be at a minimum amount of €500 per annum for the</i>	No changes to the State top-up model were made on implementation of AE. Under the Automatic Enrolment Retirement Savings System Act 2024, the State top-up is paid only in respect of participants who are currently employed and earning.	<i>Implementation of this recommendation falls within the remit of the Department of Finance.</i> Recommendation: We recommend the Minister engages with the Department of Finance to explore the feasibility of implementing this recommendation. Extending the State top-up to all members of the AE Scheme, rather than limiting it to those in paid employment, would improve retirement outcomes for individuals not currently in the workforce, a cohort disproportionately comprised of women, including those in caring roles. The Council recognises that this reform carries significant Exchequer implications and would require careful fiscal analysis, scheme redesign and primary legislation. Notwithstanding



	<i>first five years of the scheme. Alternatively, to make the scheme more attractive in the beginning, a sign-on bonus could be considered, for example a €1,000 sign-on bonus. In New Zealand, a “kickstart” bonus of NZ\$1,000 was introduced in early years of AE. It was withdrawn in subsequent years.”</i>		these considerations, the Council considers this to be a key structural reform with the potential to meaningfully reduce the gender pension gap and recommends that the Minister explores the feasibility of its implementation. (High impact on closing the gap).
6	“Extend the period for claiming tax relief on personal contributions” <i>“The Minister could facilitate women to “catch up” on their retirement savings by allowing a longer look-back period to claim tax relief on personal contributions. The Council suggests that, at a minimum, this could be aligned with the claim period for medical expenses (four years).”</i>	No actions have been taken to implement this recommendation. The position remains unchanged. The Taxes Consolidation Act 1997 (the “ TCA 1997 ”) and the Revenue Tax and Duty Manual continue to govern the claim period for tax relief on pension contributions.	Implementation of this recommendation falls within the remit of the Department of Finance. Recommendation: We recommend the Minister engages with the Department of Finance to explore the feasibility of implementing this recommendation, having regard to its potential to facilitate women in closing the gap in their retirement savings. Given that any amendment would require changes to the TCA 1997 and carries potentially significant revenue implications necessitating careful fiscal analysis and planning, we have categorised this recommendation as



			requiring significant work or investment to achieve. (High impact on closing the gap).
7	<i>“Expand the definition of earnings when calculating the maximum personal contribution allowed”</i> <i>“The Minister could consider changing the definition of earnings for tax-relievable personal contributions. For example, it could be based on averaged earnings over three or more years. This approach would help those who move from full-time to part-time work to save more for retirement. It would also be aligned with the way in which final remuneration is calculated by Revenue for pension purposes (it can be calculated on one of three bases, including averaging over any three or more consecutive years ending not earlier than ten years before the relevant date).”</i>	No actions have been taken to implement this recommendation.	<i>Implementation of this recommendation falls within the remit of the Department of Finance.</i> Recommendation: We recommend the Minister engages with the Department of Finance to explore the feasibility of implementing this recommendation. This requires an amendment to the definition of “<i>relevant earnings</i>” under the TCA 1997 and engagement with Revenue on implementation and anti-avoidance safeguards. It is therefore categorised as a recommendation requiring significant work and resourcing to implement. (High impact on closing the gap)
8	<i>“Standardise the maximum personal pension contribution allowed”</i>	No actions have been taken to implement this recommendation, and the maximum personal	<i>Implementation of this recommendation falls within the remit of the Department of Finance.</i>



	<i>“The current structure is age related, favouring older people. If it were to be standardised, this could facilitate women to save more at times that better meet their needs. In particular, this has an added benefit: if a person starts to save earlier in their working life, they should expect to be better off at retirement, as they benefit from a longer period of investment returns and those returns also earn investment returns.”</i>	pension contribution allowed remains unchanged.	Recommendation: We recommend the Minister engages with the Department of Finance to explore the feasibility of implementing this recommendation. Updating the current structure would enable women to save more from an earlier age, which could potentially go towards offsetting the impact of periods spent outside of the workforce at later life stages. (High impact on closing the gap).
9	“Move to a joint assessment basis for pension contributions” <i>“The pension tax relief system is individualised. If it were changed to a joint basis (i.e., spouses could contribute to each other’s retirement savings arrangement), this could allow women to save and/or save more in retirement savings accounts in their own names. This could particularly encourage more women who choose, for family or other</i>	No actions have been taken to implement this recommendation. The position underpinning this recommendation remains the status quo.	Implementation of this recommendation falls within the remit of the Department of Finance. Recommendation: We recommend the Minister engages with the Department of Finance to explore the feasibility of implementing this recommendation. While we recognise this represents a fundamental reform of the individualised pension tax relief



	<i>reasons, to work part-time and who may not be “at risk of poverty” to save for retirement. The added benefit would be to facilitate more independence for women when in retirement.”</i>		system in Ireland, requiring primary legislation and careful design to prevent misuse, with significant revenue and policy implications, its potential to meaningfully rebalance the pensions gender gap merits its consideration. (High impact on closing the gap).
14	“Financial Literacy: Introduce a personal finance module for transition year students.” <i>“An option that the Pensions Council strongly supports is to introduce a module for secondary school children on personal finance, including saving and investing for retirement as well as the types of benefits available in retirement (lump sum, annuity, approved retirement fund). To get the maximum coverage, consideration could be given to introducing this module to transition year students, rather than having it as part of a subject that has less take-up than the core subjects. This could be done online with, for example, the support</i>	This recommendation has not been implemented, and our research suggests no comparative educational initiative addressing financial literacy at second level has been established.	While not strictly “within the system”, the Pensions Council would strongly support work towards implementing this recommendation. Achieving this requires the co-operation of the Department of Education, curriculum design and approval processes, teacher training and the involvement of professional bodies, a multi-departmental, longer-term undertaking, which we recognise as a significant undertaking. Recommendation: We recommend the Minister engage with the Department of Education to explore the feasibility of redeveloping the current Transition Year micro-module,



	<i>of one or more professional bodies.”</i>		<i>“Being Financially Literate and Making Informed Financial Decisions”, as a mandatory module to include a mandatory chapter specifically addressing pensions. This module should address both the causes of the gender pension gap and the strategies which women can implement to reduce its impact in their lives. Such a module would draw women’s attention to the issue from the very outset of their working lives and potentially play a meaningful role in improving financial literacy among young women at an early stage, contributing to better retirement outcomes and a narrowing of the gender pension gap over time.</i> We note that existing initiatives in this space are either optional, ad hoc or do not specifically address retirement savings and pension planning. (Low impact on closing the gap).
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