

Overview	Legal Change	Action required
<p>Recording Working Time</p> <p>Employers are now obliged to have a system for recording working hours – confirmed by the European Court of Justice.</p>	<p>With effect from May 12, 2019 all companies (of whatever size) are obliged to keep a record of employees' working hours.</p> <p>The recording system must be objective, reliable and accessible.</p> <p>The record must be kept for all workers no matter what category or professional group. There are limited exceptions for senior managers or managers with specific responsibilities or positions of trust. For collective or individually agreed flexible hour arrangements, a non-daily based record is permitted. The rules allow the employer to choose the means of implementing the recording system used (manual and digital are both acceptable) but they must align with the provisions of the relevant collective agreement. If there is no collective agreement, the employer can choose the method after consultation with the workers representatives.</p> <p>Records must be kept for 4 years and must be available to the workers, their legal representatives and the Labour Inspectorate.</p> <p>The Inspectorate has said they will not impose fines for breaches in the first few weeks but it is not clear when this grace period will end.</p>	<p>Implement a compliant time recording system as a matter of urgency for all employees.</p>
<p>Gender Equality</p> <p>New rules are established to guarantee workplace gender equality.</p>	<p>Companies are obliged to have an Equality Plan with evaluable measures that aim to remove the barriers to equality between men and women.</p> <p>The plans must address: candidate selection, professional categories, training, promotion and career development, working conditions, shared responsibility for private life, under representation of women, remuneration and the prevention of sexual harassment.</p> <p>Companies must keep an official book of average salaries by gender and professional group or category. Workers have right of access to these records. Where average salaries in the same category differ by more than 25%, the employer must justify the difference.</p> <p>The rules come into force:</p> <ul style="list-style-type: none"> > more than 250 employees – already in force > between 150 and 250 employees – within 1 year > between 100 and 200 employees – within 2 years > between 50 and 100 employees – within 3 years 	<p>Understand the rules and ensure compliance in accordance with the timetable.</p>

This is a high level general update only. Legal advice should be obtained on specific circumstances.