

A phased approach to building ESA compliance into everyday hiring and onboarding.

Do your job postings meet today's standards?

This checklist is designed for HR and Total Rewards leaders responsible for pay governance, job postings, and candidate experience. It's especially valuable for teams navigating limited resources while balancing compliance, consistency, and employer brand.

Ontario's Employment Standards Act (ESA) updates on pay transparency are reshaping how organizations hire, onboard, and communicate with candidates. Compliance is the baseline—but the real opportunity is to use these changes to:

- Strengthen pay governance
- Standardize hiring workflows
- Build trust with employees and candidates

This resource provides a practical, phased roadmap to guide your team. It covers the essentials for ESA compliance, plus strategic steps to ensure your approach reflects your culture and values—not just the letter of the law

For deeper insights, read the companion blog post: Ontario's New Pay Transparency Rules: What HR Needs to Know

PHASE 1

Confirm Scope & Compliance Requirements

TIMING

Weeks 1-2

STRATFORD ADVICE

Don't rely on good intentions—assign clear responsibility and back it up with systembased reminders. Even if some postings are exempt, applying a consistent approach across all postings reduces risk and confusion.

rules apply to your organization.		
	Verify your organization crosses the 25+ employee threshold.	
	Identify all roles and postings subject to Ontario ESA compliance.	
	Flag internal-only or out-of-province postings as potentially exempt.	
	Inventory current job posting templates, offer letters, onboarding docs, and workflows.	
	Assign a cross-functional project lead (HR, Legal, Compensation) to oversee readiness.	
	Establish accountability for recurring requirements like	

PHASE 2

Align Job Architecture & Compensation

TIMING

Weeks 3-4

STRATFORD ADVICE

Use this regulatory update as an opportunity to reinforce trust and transparency across your workforce—not just to meet the letter of the law.

Salary transparency only works if your internal compensation framework is accurate and defensible.

45-day candidate notifications and vendor oversight—

and note where automation (e.g. ATS reminders) can

support follow-through.

Refresh our build out your job architecture and role
definitions.
Set and calibrate salary bands to reflect both internal equity and external benchmarks.
Validate that all public salary ranges fall within the \$50,000 spread limit.
Confirm treatment of high-paying roles (>\$200K).
Conduct a pay equity scan to ensure defensibility of ranges.

PHASE 3

Update Templates, Systems & Records

TIMING

Weeks 5-6

STRATFORD ADVICE

Confirm your ATS and HRIS vendors can deliver required data retention and automation—you don't want compliance living in spreadsheets.

Templates and systems are where compliance lives in practice. Build the right infrastructure now to avoid last-minute fire drills.

Update job posting templates to include:

- Fixed pay or salary range
- Vacancy disclosure
- Al usage declaration (if applicable)
- Removal of "Canadian experience required" language

Ensure alignment between postings and offer templates
so that compensation, role details, and conditions
match consistently.

- Confirm onboarding documentation includes all ESA-required details:
 - Employer legal name, contact info, work location
 - Starting pay rate, pay schedule, and initial work hours

Configure ATS/HRIS to:

- Retain posting metadata for 3 years
- Track candidate communication deadlines (45 days)
- Support version control across templates
- Automate recurring compliance tasks where possible, such as reminders, status notifications, and audit scheduling

PHASE 4

Train & Communicate Internally

TIMING

Weeks 7-8

STRATFORD ADVICE

Treat training as a culture opportunity—reinforce fairness, equity, and transparency as organizational values.

Compliance depends on people, not just policies. Prepare your recruiters, managers, and candidates for transparent conversations.

Train hiring managers and recruiters on:

- New posting requirements
- How to discuss compensation and Al responsibly (what to say and what not to say)

Launch an internal 45-day candidate follow-up workflow

Create candidate-facing resources such as a "How Pay Works Here" one-pager.

Provide internal communication toolkits for consistency.

Monitor, Maintain & Optimize

TIMING

Ongoing

STRATFORD ADVICE

Use compliance as a strategic advantage. Pay transparency creates opportunities to strengthen equity and improve workforce planning. Regular audits and updates show employees and candidates that transparency and fairness are part of your culture, not just a regulatory requirement.

and adjustments will keep your practices current and credible.	
	Schedule annual audits of postings and templates to keep messaging clear and current.
	Stay updated on ESA enforcement and future amendments.
	Review vendor contracts annually to confirm ATS/HRIS and recruitment partners remain aligned with ESA requirements.
	Recalibrate salary bands at least once per year using updated market data and internal pay equity scans.
	Conduct spot audits of hiring manager practices to

ensure conversations match posting requirements and

identify compliance pain points and improve the hiring

Track feedback from candidates and managers to

Compliance is not a one-time exercise. Ongoing audits

How Stratford Can Help

Clients who engage Stratford for board governance tools often turn to us for support in

Need something not listed here? Just ask—we're here to help. Design & Compliance Fit-Out Align your compensation philosophy, job architecture, and salary bands with Ontario's new standards—including range restrictions, vacancy disclosures, and Al usage statements.

documentation.

experience.

Market Benchmarking & Equity Checks Benchmark your roles against reliable market data and run internal pay equity scans to ensure your public ranges are defensible, realistic, and compliant.

Systems & Workflow Setup Configure your ATS or HRIS to manage posting metadata, automate 45-day notifications, and ensure retention compliance—without burdening your teams.

Manager Training & Candidate Communication From hiring manager briefings to candidate-facing FAQs, equip your team to speak confidently and consistently.

Let's Keep Building Momentum.

