



Instituto de Crédito Oficial

Instituto de Crédito Oficial's II Equality Plan

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1. Introduction

Instituto de Crédito Oficial (ICO), a public business entity with legal personality and a public bank that is considered to be a State Financial Agency and a credit institution of a legal nature, with management autonomy for the fulfilment of its purposes, **is aware of the importance of the principle of equal treatment and opportunities between men and women, a principle which must be integrated into all of the institute's policies and activities.**

For its part, the Legal Representation of Workers has shown the importance it attaches to the effective implementation of this principle, as well as its interest in promoting measures to avoid any discrimination.

ICO's VI Collective Agreement (Art. 49.bis) and general principles of its Code of Conduct (art.4) both reflect the universal legal principle of equality between men and women, which is also enshrined in our constitution.

In fact, of the Code of Conduct's 11 general principles, three focus on **equality of opportunity and non-discrimination, work and personal life balance** and **respect**, through which ICO rejects any manifestation of physical, sexual, psychological or moral violence or harassment in the workplace, as well as any offensive or abusive behaviours that create an environment that endangers the rights of employees.

In addition, two other principles focus on the consideration of **employee training** as a strategic investment and on the **prevention of occupational risks**, considered to be the occupational health and safety that is fundamental to achieving a comfortable and safe working environment.

The present II Equality Plan has been prepared and approved with the aim and desire to continue improving equality, especially regarding those policies and activities relating to processes of selection, training, career development, remuneration, occupational health and prevention of sexual harassment and sex-based harassment. In compliance with the provisions of art. 45 of Organic Law 3/2007 of 22 March, for effective equality between women and men, it has been agreed, by due process of negotiation with the Legal Representation of Workers, that ICO is a workforce of more than 250 workers.

The Plan is divided into seven major points.

1. Promoting equal opportunities in access to public employment.
2. Improving equality in career development.
3. Training, informing and awareness-raising; crucial elements for a transversal application of gender equality policies, aims to achieve the majority of the Plan's priority objectives.
4. Working hours, work-life balance and joint responsibility, which, along with the third point, concentrates nearly 60% of the measures referred to in this Plan.
5. Payments; focuses on understanding the reasons why women, in the course of their career, sometimes occupy lower-paid positions than men.
6. Contributing to the eradication of gender-based violence and monitoring other situations requiring special protection.
7. Occupational health measures.

The Plan is accompanied by an evaluation programme, which will allow it to be monitored and implemented, as well as its results to be evaluated.

2. Declaration of intent

Instituto de Crédito Oficial declares its **commitment to truly and effectively integrating the principle of equal treatment between women and men as a strategic principle in the development of policies and measures in each and every one of the areas occupied by ICO staff**. Staff hiring, promotions (including wage policy), training, working and employment conditions, occupational health, the organisation of working time and work-life balance will be addressed.

In accordance with the **definition** established by Organic Law 3/2007, of 22 March, on effective equality between women and men, the principle of equal treatment between women and men implies the absence of any direct or indirect discrimination on the grounds of sex, and, especially, relating to childbirth and childcare, the assumption of family obligations and marital status.

Going beyond the mere recognition of formal equality before the law, and in order to contribute to the necessary conciliation between personal, family and professional life, ICO realises its **commitment to childbirth and childcare and the assumption of family obligations through the EFR (Family-Friendly Company) certification** that it maintains and periodically reviews. It does this to ensure that reconciliation becomes viable as the driving force of well-being through shared responsibility and in response to the commitment of the organisation's staff. ICO's Family-Friendly Company model of managing reconciliation aims to:

- Contribute to eliminating barriers to the participation of women and men in their personal life and in the company's activity, through its policies.
- Promote a work environment that is compatible with personal development, one that allows its professionals to balance the fulfilment of their job responsibilities in a public institution, such as ICO, with the needs of their personal and family life.

These commitments are present in the 2030 Agenda's **Sustainable Development Goals**, which ICO is committed to.

In order to ensure the achievement of real equality between women and men in the company and, by extension, in society as a whole, and in order to improve the present situation, the principles will be implemented through the **present Equality Plan**, mediating the resources needed for elaborating, updating and implementing the measures and actions provided for in this Plan, **which directly contribute to achieving the following SDGs:**

- **Goal 5 "Gender Equality"**, which seeks to achieve equality between women and men across the world at the occupational, social, political and economic level, ending gender discrimination. Making an equality plan, increasing the percentage of women in leadership positions and developing work-life balance plans are actions that promote the achievement of this goal.

- **Goal 3 "Good health and well-being"**, which aims to improve the health and well-being of the population to reduce mortality and the number of diseases. Promoting healthy lifestyle habits among employees and having occupational health and safety systems in place contribute to this goal.

In turn, all of the above results in the achievement of other broader SDGs, such as **Goal 8 "Decent work and economic growth" and Goal 10 "Reduced Inequalities"**.

Regarding both internal and external **communication**, all decisions taken in relation to this topic will be reported and an image of the company will be projected in accordance with this principle of equal opportunities between women and men.

Workers' legal representation will be help this purpose and commitment.

3. Scope of application

The present Equality Plan will be applicable to all ICO staff.

4. Validity of the Equality Plan

The present plan is effective for a period of four years beginning on 1 January 2020 and ending on 31 December 2023, on the understanding that it is extended annually while the parties do not reject it.

The rejection must be made at least four months before the end of the current validity or extension period, in writing addressed to the other party.

Once the Plan is rejected, its duration shall be understood to have been extended while a new one is not approved.

5. Result of the analysis of ICO's equal opportunities situation

As a preliminary step to the negotiation and signing of the Equality Plan, pursuant to Articles 45 and 46 of Organic Law 3/2007 of 22 March, on effective equality between women and men, we analysed the current situation, with data updated to 1 October 2019, negotiated with the Legal Representation of Workers within the negotiating committee of the II Equality Plan.

Next, the general conclusions obtained as a result of the above-mentioned diagnosis were determined.

Regarding the **workforce's composition**, 189 (61%) are women and 121 (39%) are men, of a workforce of 310 people. It should be noted that the workforce covered by the agreement is composed of 65% women and 35% men.

Meanwhile, the workforce outside of the agreement is composed of 45% women and 55% men.

ICO's General Board is formed by ICO's President, who is also president of the Board, and 10 members. Of these 10, 4 members are women and 6 are men, representing a parity of 40/60. In terms of the number of total votes for the adoption of agreements relating to financial assets and liabilities operations of the Institute's own business (15 votes), 7 corresponded to women and 8 to men, representing a parity of 47/53.

The analysis of the composition of the workforce shows that women are under-represented in the management field. Management positions are freely appointed, so this statistic cannot be modified through selection processes, but must instead be modified at another level.

Similarly, women are under-represented in the workers' committee. Either way, it should be noted that two out of the three presented candidacies for the union elections held in February 2019 were of equal representation, while most of the components in the other candidacy were men. As a result of the above and the order of the lists, women are under-represented in the workers' representative body.

Finally, there is an under-representation of men in the administrative occupational group, which may be due to the fact that this group has always traditionally been composed of women.

In terms of the Institute's structure by **age**, the average age of the workforce is 48 for both women and men. Women are the majority in practically all age brackets, in accordance with the workforce's composition.

In relation to the **contract type**, women represent the majority for both employees with permanent contracts and employees with temporary contracts. This arises from the fact that women comprise the majority of ICO's workforce.

In the analysed data regarding **career**, we again see a distribution that correlates with the workforce's composition. Women formed the majority at almost all career stages. The female majority becomes more pronounced the longer the career.

Regarding the Institute's **remuneration and professional development policy**, a professional development system was implemented in ICO's III Collective Agreement that establishes objective criteria that favour equal opportunities and eliminate discretion in remuneration and development policies.

Regarding the average wage of the different wage levels of **technical and administrative professional groups**, there were no significant differences between men and women. Either way, these variations are not due to gender but due to insufficient resources for the promotions fund that prevents the correct operation of the professional development system.

More specifically, since 2013 the CECIR (Management Body of the Interministerial Remuneration Committee) has been substantially restricting funds for the Professional Development System (SDP), in the corresponding payroll permits and on the grounds of austerity and cost containment in the field of public employment, thus reducing the contribution percentage from 1.2% of the payroll to 0.20%.

This situation has resulted in a lack of available funds for the promotions arising from the development and implementation of the SDP.

Notwithstanding this, the CECIR has not suspended or cancelled the SDP. The SDP continues to be in force without the sufficient economic endowment to support it and, as a result, the allocation of points by evaluations of performance has continued.

This lack of resources has meant that, despite having obtained the necessary points, workers have not been able to increase their salaries in the terms set forth in ICO's VI Collective Agreement.

In the past year's evaluations of the professional development systems, 65% of promotions have corresponded to women and 35% to men. The aforementioned evaluations included 9 workers classified as "excellent" (55% women and 45% men) and 14 workers classified as "Very Good" (71% women and 29% men). Of the total number of persons who have been granted the highest classifications, 22% had reduced working hours to care for family members.

Regarding the remuneration policy of **Middle Managers (Department and Area Heads)**, there are a few measures authorised by collective agreement that cannot be surpassed in any case. In the case of department heads, there is no difference between the average remuneration of men and women. However, in the area heads group there is a minimal difference; women have a 0.5% higher salary level compared to men.

Finally, regarding the remuneration policy of the **management staff (10 managers and 4 general managers)**, there is existing legislation that guarantees equality in pay without taking gender into consideration. In this case, the average wage of the managers is 3.66% lower for women than men, but this difference is caused by the fact that the legal advice manager is a man, with the role being accompanied by a higher salary than that of the other managers (as it is a senior management contract).

Regarding the **workday**, 86% of staff have a split shift, which is more economically advantageous than the continuous shift. 81% of women have a split shift, compared to 93% of men. Of the total workforce, around 10% has opted to qualify for a reduction in their working hours for work-life balance reasons.

In response to the nature of the requested reduction, it must be noted that the reduced working day for caring for relatives is a measure that only women have taken advantage of, with no men having taken this reduction. Also, in terms of reduction due to childcare, it is mainly women who request this measure, amounting to 93%.

Finally, in the last five years a total of 18 contract suspensions have occurred due to leaves of absence to care for relatives, with these suspensions only having been requested by women.

Regarding ICO's **selection policy**, the following aspects should be mentioned:

- Selection Panels promote the criterion of parity whenever possible when appointing its members.
- The agendas that are published include topics on "Social and gender equality policies".
- The selection process supports choosing candidates based on the assessment of their merits, through phases assessed either through published agenda testing and through language tests, or by scoring experience and training criteria in the personal interview.
- Over the last six years, ICO has incorporated a greater number of women (56% women compared to 44% men) into its workforce. This has been the same for all selection processes except for the last OEP (Public Employment Offer) in 2018.

Regarding **training**, it should be noted that the female group is in the majority both in terms of the number of people who receive training (62% women and 38% men) and in terms of the number of hours of training received (55% hours for women compared to 45% hours for men). In any case, these percentages are in line with the distribution of the whole workforce by gender (61% women and 39% men).

In addition, mention should be made of the following aspects of ICO's Training Plan:

- 100% of training courses in the Selection, Training and Development Area were carried out within the workday to facilitate attendance.
- Only postgraduate or masters courses and courses that employees request with timetables set outside of ICO's jurisdiction were carried out outside of the workday.
- Some courses are organised by ICO in the afternoon or are carried out in eight-hour days, which means that employees with reduced working days or weeks may have difficulty attending these. In order to facilitate attendance, economic aid (menu ticket) is being established and the hours spent doing courses will be counted as time worked.
- To contribute to work-life balance there are different forms of training, face-to-face, in-company or outside ICO, on telephone and online. The method most used by employees is face-to-face, however for the Language Programme, telephone training reaches 80%. Workers may choose, as far as possible, the training mode that suits them best.

Finally, in relation to **preventing sexual and gender harassment**, ICO has a workplace harassment procedure available for all employees. It has not been utilised at any point since its creation.

6. Equality Plan Objectives

Consistently with the diagnostic results, the present Equality Plan's general objective is to reinforce the right to equality of opportunity and treatment between the women and men who work at the Instituto de Crédito Oficial.

Achieving the overall objective is concentered in the following action axes and specific objectives:

Axis 1: Access to public employment.

- Objective: To consolidate and ensure equal treatment and equal opportunities in access to public employment.

Axis 2: Professional promotion.

- Objective: To ensure equality of treatment and opportunities in promotions, using objective and transparent criteria.

Axis 3: Training, information and awareness-raising.

- Objective 1: Ensure all staff have access to training given by ICO, ensuring knowledge of the Training Plan and training actions, regardless of the professional group, category, position and gender.
- Objective 2: Raise awareness of equality of treatment and opportunities for ICO's workforce
- Objective 3: Inform and disseminate ICO's gender equality policies to raise awareness of these among all staff and especially among Management, Middle Management and within the workers' committee in order to contribute to its implementation.

Axis 4: Working time, work-life balance and joint responsibility in personal, family and work life balance.

- Objective: Ensure that work-life balance rights are exercised, informing people of these and making them accessible to the whole workforce. Encourage the use of joint responsibility measures among the workforce's men.

Axis 5: Remuneration.

- Objective: Monitor the implementation of the remuneration policy to ensure equal pay for work of equal value.

Axis 6: Gender-based violence

- Objective: Promote actions to prevent gender-based violence and improve the institution's response to it.

Axis 7: Occupational health.

- Objective: Implement policies and preventive practices that protect the occupational health of all employees and ensure that they enjoy a work environment free of harassment situations.

6.1 Measures and Indicators

The achievement of the aforementioned objectives are implemented through the set of measures described below.

The indicator that will allow the degree of compliance to this Equality Plan to be measured is included with every measure.

Axis 1: Access to Public Employment

Objective: To consolidate and ensure equal treatment and equal opportunities in access to public employment.

Measure	Indicator
Measure 1 Maintain the inclusion of specific knowledge of equal treatment and equal opportunities in the testing of selective processes.	Yes/No Documentation review
Measure 2 Continue promoting the principle of balanced representation between men and women in the composition of the staff selection panels , whenever possible, respecting the principles of professionalism and the specialisation of its members, with special emphasis on the appointment of the most representative positions (Presidency and Secretariat).	Members of Selection Panels by sex.
Measure 3 Internally or externally advertised job opportunities use non-sexist language and images.	Documentation review
Measure 4 Take reasonable and appropriate measures to ensure that the pregnant applicants or applicants who have maternity and childcare leave can take part in all stages of the selective process.	Documentation review
Measure 5 Inform the Joint Committee of the different selection processes carried out, with an analysis of the data distributed by sex, of persons admitted to the process and approved at each of its stages.	Minutes of the meeting
Measure 6 Incorporate ICO's commitment to equal opportunities in job advertisements and inform candidates of this commitment in the interviews that form part of the selection process.	Review the interview script and basis of the advertisements

Axis 2: Promotion

Objective: To ensure equality of treatment and opportunity in promotions, using objective and transparent criteria.

Measure	Indicator
<p>Measure 1 Guarantee that the principle of non-discrimination and equal opportunities is respected in all promotions or economic advancements, with any discrimination on the grounds of gender or in relation to any work-life balance measure or maternity and childcare leave being completely forbidden.</p>	<p>No. of people promoted in the financial year broken down by gender and continued or relevant use of conciliation measures</p>
<p>Measure 2 To have statistical data available and periodically monitor the proportion of women to men in positions of responsibility. This information will be forwarded to both the Workers' Committee and the CODIR annually, with a specific reference to the deviation that may exist regarding the parity percentages.</p>	<p>No. of women and men in positions of responsibility. Yes/No Documentation review sent to Workers' Committee/CODIR</p>
<p>Measure 3 Evaluate and, where appropriate, propose the participation of employees who meet the requirements in each advertisement of "Promoted" and "Progress" projects organised by the CEOE in collaboration with the Ministry of the Presidency, Relations with the Courts and Equality.</p>	<p>No. of actions aimed at promoting participation in "Promoted" and "Progress" projects</p>

Axis 3: Training, information and awareness-raising

Objective 1: Ensure all staff have access to training given by ICO, ensuring the knowledge of the Training Plan and training actions, regardless of the professional

Measure	Indicator
<p>Measure 1 Measure 1 Analyse the data on number of hours of training, investment and number of attendees from a gender perspective.</p>	<p>Number of hours of training broken down by sex, Number of hours of training per type of working day Investment in training broken down by sex, Number of training attendees broken down by sex</p>
<p>Measure 2 Request that external training companies and internal trainers revise the language, the contents and materials used from the perspective of gender so that they do not contain gendered stereotypes or connotations.</p>	<p>Number of Companies informed Number of Internal Trainers informed No. of employee complaints</p>
<p>Measure 3 Create a response protocol for workers on maternity or childcare leave, lactation breaks or leave to care for children or family members to express their desire to join training courses, with the aim that this absence does not form a barrier in their professional progress.</p>	<p>Yes/No Implementation of the Protocol</p>
<p>Measure 4 Form ICO's workforce, especially at the control and manager level, based on equal opportunities.</p>	<p>Number of actions List of actions</p>
<p>Measure 5 Train and raise awareness amongst the staff responsible for external communication (web page, press relations, etc.) in the areas of equality and non-sexist language use.</p>	<p>Number of actions List of actions</p>
<p>Measure 6 Promote access for all staff to courses organised by HR so that whenever possible, the courses are taught in the morning or at times when presence is required.</p>	<p>Number of actions in the morning or during required presence / total number of actions</p>

Objective 2: Raise awareness of equality of treatment and opportunities for ICO's workforce

Measure	Indicator
Measure 1 Organise activities or workshops for all staff on equality, with one of these actions taking place in the week of International Women's Day (8 March).	Number of actions Number of actions in the week of International Women's Day List of actions
Measure 2 Collaborate with Public Administrations, advertising institutional campaigns related to equality in the workplace.	Number of institutional campaigns List of campaigns
Measure 3 Ensure non-sexist use of language in ICO . Review and, if necessary, correct the language, images, text and content of external communications (web page, leaflets, annual report, etc.), and internal communications (welcome handbook, Intranet, press releases, newsletters, e-mail, etc.) to ensure their neutrality regarding gender and that they do not contain sexist terms, images or stereotypes.	Number of communications reviewed Number of modifications made
Measure 4 Include a section on Equal Opportunities in the Welcome Handbook for new additions.	Yes/No Section included in the Handbook
Measure 5 Boost the awareness of middle managers in the field of work-life balance (strengthening communication with all work-life balance measures), with a special emphasis on the fact that childcare is not only a female role, and that flexibility measures can be enjoyed equally by both men and women.	Number of awareness-raising actions carried out
Measure 6 Try, as far as possible, to ensure gender diversity in the participation of ICO employees in activities such as panels, lectures, conferences, etc..	Number of events organized by ICO No. of speakers by gender
Measure 7 Encourage contracts to include a tie-breaking criterion of: "Hiring companies that include social and labour measures that promote equal opportunities between women and men".	No. of contracts that include this tie-breaking criterion / No. of total contracts in the year

Objective 3: To inform and disseminate ICO's gender equality policies to raise awareness of these among all staff and especially among Management, Middle

Measure	Indicator
Measure 1 Disclose and disseminate ICO's II Equality Plan for its staff to have full knowledge of it. In addition, an informative leaflet of this Equality Plan will be created to help make all staff aware of it.	Yes/No Dissemination carried out Yes/No Informative leaflet
Measure 2 Disclose ICO's II Equality Plan in order for third parties outside the Institute to be aware of it, by publishing it on the institution's website.	Publication of the Plan online
Measure 3 Annually report to ICO's employees on the development and the results of the Equality Plan.	Yes/No Information carried out
Measure 4 Hold an annual meeting within the Joint Commission to monitor and evaluate the Equality Plan in order to ensure effective compliance and to agree on appropriate measures to achieve this purpose.	Minutes of the meeting
Measure 5 Annually report to the Management Committee on the evaluation of the Equality Plan.	Yes/No Information carried out

Axis 4: Working hours, work-life balance and shared responsibility

Objective: To ensure that work-life balance rights are exercised, informing people of these and making them accessible to the whole workforce. To encourage the

Measure	Indicator
Measure 1 Keep materials on rights, permissions, measures and regulations relating to work-life balance and share responsibility up-to-date in the company's internal communication channels (Pórtico), along with publicising the new measures and amendments of these.	Yes/No Documentation Review Update Publication
Measure 2 Implement remote working and the use of information and communication technologies to facilitate the balancing of personal, family and work commitments.	No. of actions for implementation taken No. of remote workers No. of hours remote working
Measure 3 Avoid, as far as possible, calling work meetings after 16:00.	Publicisation of the Measure No. of complaints received due to non-compliance
Measure 4 Conduct information and awareness-raising campaigns specifically aimed at men on joint responsibility and equal sharing of tasks.	No. of campaigns conducted
Measure 5 Develop a quick guide on work-life balance permissions and measures that the workforce can make use of in the case of childbirth and care, adoption, guardianship for the purpose of adoption and foster care.	Yes/No Guide created
Measure 6 Annually collect and publish statistical data broken down by sex of the different permissions, contract suspensions and leaves of absence related to work-life balance.	No. of men and women by type of measure Published: Yes/No
Measure 7 Ensure that persons with children under 12 years take priority for taking holidays and individual days off during periods when their children are off school.	Publicisation of the Measure No. of complaints received due to non-compliance
Measure 8 Maintain the Family-Friendly Company (EFR) label, granted by the Más Familia Foundation, for being a company committed to balancing its employees' work and personal lives.	Yes/No

Axis 5: Remuneration

Objective: Monitor the implementation of the remuneration policy to ensure equal pay for work of equal value.

	Measure	Indicator
Measure 1	Ensure that Management by Objectives and the Professional Development System are not affected by situations of leave derived from childbirth and childcare.	Review of Policies Yes/No
Measure 2	Carry out an analysis of the wage structure of different professional groups to determine the causes of wage differences detected between women and men, monitoring these through the Joint Commission.	Yes/No Minutes of the Joint Commission
Measure 3	The maximum amount provided for requested housing loans will not be affected by a proportional wage decrease that results from a legal guardian's reduction of working time.	Review of Policies Yes/No

Axis 6: Gender-based violence

Objective: To promote actions to prevent and improve the institution's response to gender-based violence.

	Measure	Indicator
Measure 1	Participate in information and campaign programmes to increase awareness of the problem of gender-based violence and contribute to preventing gender-based violence against women.	No. of actions carried out
Measure 2	Inform the workforce of the legally recognised rights of female victims of gender-based violence via internal communication.	Documentation review and update Yes/No
Measure 3	Facilitate the adaptation of the workday or flexibility of working hours for female victims of gender-based violence to enforce their protection or their right to comprehensive social protection, subject to proof of this situation.	Publication: Yes/No No. of requests
Measure 4	Promote the interdepartmental mobility of female employees who are victims of gender-based violence, developing an internal procedure for processing their application and increasing awareness of the procedure amongst the workforce.	Creation of internal protocol: Yes/No Protocol publication: Yes/No
Measure 5	Ensure female employees who are victims of gender-based violence have confidentiality throughout their career, to ensure the protection of their physical and moral integrity.	Inclusion of guarantees in the internal protocol: Yes/No

Axis 7: Occupational Health

Objective: To apply preventive policies and practices that protect the health of all employees and ensure that they can enjoy a harassment-free work environment.

Measure	Indicator
Measure 1 Promote the integration of the gender perspective in preventing occupational risks, in order to ensure compliance with the Health and Safety at Work Act.	Facilitate direct communication of pregnant women with the prevention service: Yes/No
Measure 2 Disseminate the protocol against harassment in the workplace.	Publication: Yes/No

7. Equality Plan evaluation and monitoring

The monitoring and evaluation of the Equality Plan will take place throughout its implementation, in a way that ensures the attainment of the proposed objectives and, if applicable, that allows new measures or indicators to be introduced or corrected.

Monitoring shall be carried out annually, by preparing an assessment report detailing the progress of the Plan based on the measurement of the indicators covered in the previous point.

This report shall be submitted, along with the proposals for action, to the Joint Committee, the body that is responsible for continuously monitoring the implementation of the Equality Plan under the provisions of art. 49 Bis of ICO's VI Collective Agreement.

This assessment report will also be annually submitted to the Management Committee so that they are aware of it.

Finally, the development and monitoring of the plan will be disclosed amongst the workforce.