



EUROPEAN CENTRAL BANK

EUROSYSTEM

SEC/reference number

DIRECTORATE GENERAL HR, BUDGET & ORGANISATION  
HR POLICIES & STAFF RELATIONS DIVISION

**FINAL**  
79538951

**To:** The Executive Board

**Via:** P. Praet [approved], S. Keuning [approved]

**From:** [REDACTED]

**Cc:** [REDACTED]

**Date:** 2 September 2013

**Subject:** **Implementation of the action plan to enhance gender diversity for salary bands I and above**

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*On 4 June 2013, the Executive Board approved the introduction of ECB-wide gender targets by end-2019 and of interim targets for 2015 and 2017 for salary bands I and above. In order to reach these gender targets, the Executive Board also endorsed the implementation of an action plan proposed by DG/H. Furthermore, it requested DG/H to reflect on the proposals which would require a change in the legal framework and a consultation with the staff representatives, and decided to revert to this matter at one of its forthcoming meetings.*

*This memo (i) informs about the progress achieved on the action plan, (ii) discusses necessary as well as recommended changes to the Staff Rules which would subsequently require a consultation of staff representatives, (iii) presents a proposal for the Diversity Ambassador concept as one of the measures of the implementation plan which were endorsed and (iv) contains a proposal on the monitoring and reporting tools regarding targets and gender diversity indicators.*

## **1. Action plan: overview of progress; required changes to the staff rules**

The gender diversity action plan outlines a series of operational measures and instruments to support and monitor Business Area management in reaching the gender targets.<sup>1</sup> Since the Executive Board endorsed the action plan, DG/H has thoroughly reviewed the current HR provisions and processes potentially affected by the action plan to identify whether the actions could be implemented via a change of processes and/or require a change of rules.

Taking into account the available provisions of the Staff Rules and their flexibility, it was assessed that implementation of the actions proposed in the action plan can start immediately. Accordingly, DG/H has already implemented and/or started to adjust processes to implement the action plan measures. An overview of the progress is provided in Annex 2 to this document. It lists measures which have already

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<sup>1</sup> The ECB follows a decentralised recruitment process, in which selection panels are chaired by the recruiting business area, while one DG/H representative also participates. For management recruitment, it is always the Executive Board who decides.

been implemented as well as the deadlines for the realisation of medium- or longer-term objectives. In fact, all action plan items either have already been implemented or their implementation is on track.

At the current juncture, the foreseen extension of the maximum number of teleworking days per month requires a change in the Staff Rules and a formal consultation of staff representatives. Hence, a review of the current teleworking policy and a proposal as laid out above has been put forward for the Executive Board's approval as a separate agenda item.

Furthermore, based on input received from DG/L (senior) management, two more changes of the Staff Rules may be considered, even if there are also other means to achieve the same goal, namely: 1. the advertisement of vacancies immediately both internally and externally, and 2. the requirement of having a minimum of two females on selection panels for positions at band H or above. The options with some arguments in favour and against will be further presented below.

For information, the draft Executive Board Decision is attached as Annex 1 to this document, containing all the proposed changes to the Staff Rules, including changes which require further decisions by the Executive Board.

### **1.1 Immediate external advertisement of vacancies**

In its meeting on 4 June 2013, when discussing the proposed options, the Executive Board agreed to advertise all new SSM-related vacancies at H-band and above immediately externally, since it considered it too cumbersome to wait if, after an internal publication of a vacancy, women account for at least one third of the shortlisted candidates. So it decided that "it would like to decide right away for joint internal and external vacancies, without the need to justify this".

Furthermore, the originally proposed measure to advertise immediately externally only if there was not a sufficient number of suitable female candidates would be operationally very challenging. In fact, it would not be possible to assess ex ante whether the women that have applied would be suitable for the position at hand. The selection process precisely serves to establish this. Hence, there seem only two viable options: either the current approach is continued, in which the Executive Board decides on a case-by-case basis for a possible immediate external advertisement, or, in order to achieve the original objective of the action plan to increase the pool of female candidates for positions at H-band and above, the Executive Board may also decide to change the Staff Rules so that all positions as of a certain level are immediately also advertised externally. Such a decision would not affect the possibility to directly fill vacancies via horizontal mobility, which should always be considered first.

As the group for which the ECB aims to achieve its targets starts at the I-band, and there is a sufficient number of female applicants available on the internal job market for H-banded positions (who have in the meantime also benefited from the mentoring programme), the ECB may be in a position to reach a sufficient level of diversity by tapping the pool of female talent internally. Therefore, DG/H presents two possibilities for a decision to advertise positions immediately externally (options B and C below):

***OPTION A: to continue the current approach – which does not require a change of rules – entailing that the Executive Board continues to decide on a case-by-case basis for a possible immediate external advertisement.***

***The two options for changing the ECB's Staff Rules:***

***OPTION B: [...]***

***OPTION C: [...]***

## **1.2 Minimum of two female selection panel members**

Since the Executive Board endorsed the action plan on 4 June 2013, based on Staff Rules designed in an inclusive way<sup>2</sup>, DG/H has embedded the diversity requirement of a minimum of two female selection members in its day-to-day recruitment operations and HR Business Partners have adopted this as standard practice.

Results achieved so far show that this measure was introduced very swiftly<sup>3</sup> and it has also had the advantage of engaging managers in a learning process about the added value of an enhanced number of female members in selection panels.

The introduction of a strict enforcement of (a minimum of) two female panel members would obviously also bring certain advantages, e.g. it would introduce a higher standard of legal certainty, giving applicants a solid litigation framework in case the organisation does not follow its rules. Yet, the Executive Board may want to be aware that a formal rule could easily impair the ECB's flexibility; e.g. when it comes to the composition of SSM senior management selection panels. This could put the ECB potentially very quickly in an "illegal" situation if the rule must be compromised for business reasons, e.g. in order to conduct SSM-related recruitment on time.

Hence, with a view to adjust to business reality, an exception clause allowing for a derogation from the rule would need to be introduced. DG/H would also recommend, in order to remain inclusive of both genders, to formulate such rules in a gender-neutral way.

In conclusion, the two discussed options are presented below for decision by the Executive Board:

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<sup>2</sup> SR Art. 1a.4.4:

"The Directorate General HR, Budget and Organisation representative shall oversee the sound and consistent application of the selection rules, endorse the composition of the selection committee and, where necessary, give instructions to ensure compliance."

SR Art. 1a.4.2:

"Selection committee members shall hold a position at least one salary band higher than the position to be filled, except the Directorate General HR, Budget and Organisation representative and at most one member from another business area, if the latter enhances the diversity of the selection committee and holds a position allocated to the same salary band as the position to be filled."

<sup>3</sup> DG/H statistics of composition of panels since the endorsement of the action plan show that all but one campaign had two female representatives in the selection panel.

***OPTION A: Continue with the operational process implemented since the endorsement of the action plan, which includes that DG/H takes utmost care that to the extent possible selection panels include two females.***

***OPTION B: [...]***

## **2. Diversity Ambassadors**

Advocating gender diversity on an on-going basis will facilitate the implementation of the measures proposed in the action plan. However, since recruitment panels are chaired and their composition is decided upon by local management and since the Executive Board decides about all appointments at I-level and above, the influence of DG/H in achieving the targets is quite limited. As a consequence, diversity requires ownership from within the Business Areas, in particular management. Therefore, it will need to be reflected, understood, implemented and lived locally by the business areas, its management and staff.

To foster this understanding, DG/H proposes to install in the business areas at least one but preferably two local ambassadors for diversity related issues. This is a model also used in similar organisations and built on the concept of diversity sponsors, with a more granular approach to ensure local support in all business areas across the organisation, where the business environment may be very different. These Diversity Ambassadors, who know the particularities and challenges of their business areas, should play an important role in promoting gender diversity and fostering a culture of inclusion and recognition of the merits of each gender, and will also be counterparts to DG/H for setting and reviewing the business area's interim and long-term targets.

The implementation of the concept of Diversity Ambassadors is designed in a budget-neutral format. Each business area will ideally appoint one volunteer at senior and one at junior or mid-management level who are committed to promoting and fostering gender diversity. The proposed mandate, profile and nomination process for Diversity Ambassadors is provided in Annex 3 to this document.

## **3. Reporting framework**

With the objective to create transparency and make business areas accountable for achieving gender diversity targets, a regular reporting needs to be established. DG/H will report to the Executive Board on an annual basis on progress per business area and for the ECB as a whole. To promote a holistic approach, DG/H will also report on a set of relevant gender diversity aspects linked to the action plan (a list of indicators covering the areas of recruitment, training, mentoring, working time, leave and staff turnover is described in Annex 4).

In order to take into account local business reality and the different levels of gender diversity in the business areas, individual business area's gender diversity targets will need to be set by the Area Head, together with the Diversity Ambassadors and DG/H and reported to the Executive Board via the Management Committee. To support Business Area Heads in the achievement of targets, DG/H will

provide them with their respective local results and will try to identify potential obstacles in case the interim results have not been achieved by discussing and analysing the respective diversity indicators for the business area. The Diversity Ambassadors will be closely involved in these discussions.

Area Heads, Diversity Ambassadors and ECB managers will be accountable for the achievement of the targets. DG/H will communicate and emphasise this principle in a forthcoming Senior Management Luncheon and the Heads of Division Communication forum. DG/C will submit in parallel a proposal on the further external communication strategy for the diversity policy dossier.

**The *Executive Board* is invited to:**

- (a) take note of the draft Executive Board Decision amending the ECB's Staff Rules (Annex 1);**
- (b) regarding a possible immediate external publication of vacancies, decide the way forward, which may be choosing one of the three Options outlined above;**
- (c) regarding a minimum number of females in selection panels, decide the way forward, which may be choosing one of the two Options outlined above;**
- (d) mandate DG/H to finalise the draft Executive Board Decision in accordance with the decisions of the Executive Board on points (b) and (c) above and to initiate a consultation with the ECB's staff representatives;**
- (e) take note of the progress of the gender diversity action plan (Annex 2);**
- (f) approve the mandate, profile, tasks and nomination process of the Diversity Ambassadors (Annex 3); and**
- (g) approve the proposed yearly reporting of progress on targets and gender diversity indicators (Annex 4).**

**DECISION OF THE EUROPEAN CENTRAL BANK**  
**of DD MM 2014**  
**amending the European Central Bank Staff Rules**  
**(ECB/2014/NPX)**  
**(NOT YET EDITED)**

THE EXECUTIVE BOARD OF THE EUROPEAN CENTRAL BANK,

Having regard to the Statute of the European System of Central Banks and of the European Central Bank, and in particular Article 11.6 thereof,

Having regard to the Rules of Procedure of the European Central Bank<sup>4</sup>, and in particular Article 21 thereof,

Having regard to the Conditions of Employment for Staff of the European Central Bank, and in particular Articles 10(a) and 25 thereof,

Having regard to the Conditions of Short-Term Employment, and in particular Articles 17 and 23 thereof,

Having regard to the opinion of the Staff Committee,

Whereas:

- (1) On 4 June 2013 the Executive Board approved a memo entitled Action Plan on Gender Diversity which established the ECB-wide gender targets for managerial positions and provided for the implementation of measures to assist the achievement of those targets. Some of those measures require amendment to the Staff Rules.
- (2) [...]
- (3) [...]
- (4) As part of the Action Plan on Gender Diversity, an extension in the maximum number of teleworking hours per month was deemed useful,
- (5) After completion of the pilot project on telework carried out from YYYY to YYYY, teleworking was assessed to benefit both management and staff of the ECB. The provisions on teleworking at the ECB should be incorporated into the Staff Rules.

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OJ L 80, 18.3.2004, p. 33.

- (6) Teleworking is a modern form of work that allows greater flexibility in the organisation of work by making use of new information technology. The flexibility offered by teleworking can improve the productivity, the organisational resilience of the ECB and the work-life balance of ECB staff.
- (7) Teleworking requires teleworkers to be highly autonomous and committed, to be well-organised and to observe deadlines. For the manager, it requires results-oriented steering and monitoring of the teleworker.
- (8) To avoid a loss of team work and to allow for internal relationship-building, teleworking may be offered on a structural, but not full-time basis.

HAS ADOPTED THIS DECISION:

## *1. Article 1*

### **Amendments to the Staff Rules**

[...]

1. The following Article 5.1 bis is inserted:

#### **‘5.1bis Teleworking**

The provisions of Article 25 of the Conditions of Employment are applied as follows:

5.1bis.1 Teleworking means the performance of work during working hours at a location other than ECB premises by using information technology and the ECB security token to remotely access the ECB’s internal network.

Teleworking shall be voluntary and reversible.

Teleworking may be carried out on a recurring or occasional basis.

Teleworking is carried out on a recurring basis if it follows a predetermined schedule agreed in advance for a period of at least three, but not more than 12 months, and which may be extended subject to the same minimum and maximum periods.

Teleworking is carried out on an occasional basis if it does not follow a predetermined schedule.

5.1bis.2 Members of staff may at their request be authorised to telework if:

- (a) their duties are suitable for teleworking;
- (b) their place of teleworking is organised in a manner such that the member of staff can work without undue distraction, in a safe and secure environment that complies in

particular with minimum safety and health requirements, and with all necessary equipment that meets the technical standards established by the ECB;

- (c) they have completed the training preparing for teleworking;
- (d) during their teleworking they are promptly reachable, by phone and by e-mail, for their line manager, colleagues at the office, and, where necessary, external counterparts;
- (e) the teleworker's absence from the office is compatible with the interest of the service;
- (f) sufficient technical capacity for teleworking is ensured.

Members of staff shall submit their request to their line manager, after having obtained confirmation from the Directorate General Human Resources, Budget and Organisation that requirements (b), (c) and (f) above are satisfied.

Teleworking on a recurring basis shall require authorisation from the line manager and the business area head; teleworking on an occasional basis shall require authorisation from the line manager.

If their request is rejected, members of staff may ask their manager to state the reason for rejection.

- 5.1bis.3 In the interest of the service, a teleworker may be recalled to the office while teleworking or have approved teleworking cancelled.

Unavoidable costs incurred by the teleworker because of a recall to the office or cancellation of telework shall be reimbursed by the ECB.

Teleworking on a recurring basis may be suspended or terminated by the ECB or terminated by the member of staff with two weeks' notice. In exceptional circumstances, an immediate suspension or termination of teleworking may be imposed in the interest of the service.

- 5.1bis.4 Teleworking may be performed for a maximum of 40 hours per calendar month. This applies whether the teleworker works full-time or part-time. Teleworking shall last at least four working hours, but not exceed two consecutive working days. In exceptional circumstances and on recommendation of the business area head, the Director General Human Resources, Budget and Organisation or their Deputy may grant exceptions.

- 5.1bis.5 Unless otherwise agreed, teleworkers shall use their own PC/laptop and internet access infrastructure to remotely access the ECB's internal network.

Teleworkers shall inform their line managers of their usual place of telework and of any changes.

Teleworkers shall be responsible for ensuring that their place of telework complies with the minimum safety and health requirements and the technical standards established by the ECB. In doing so, they may seek advice from the ECB Medical Advisers, the ECB Occupational



Safety and Health Adviser or, following prior authorisation by the Head of the Recruitment and Compensation Division or their Deputy, from a local occupational safety and health practitioner. Costs incurred as a result of the latter shall be reimbursed if reasonable, and evidenced by a detailed invoice and proof of payment.

Teleworkers shall check regularly the advice on safety and health provided by the ECB and, following any update to minimum safety and health requirements or IT security requirements shall ensure that they continue to comply.

- 5.1bis.6 Unless decided otherwise by the Executive Board and without prejudice to the third subparagraph of paragraph 5, the ECB shall not reimburse expenses in relation to teleworking.’.

#### *Article 2*

#### **Amendments to the Rules for Short-term Employment**

The following Article 5.1bis is inserted:

‘5.1bis Teleworking

The provisions of Article 23 of the Conditions of Short-Term Employment are applied as follows:

Under the conditions laid down in the Staff Rules, short-term contract employees may be allowed to telework.’.

#### *Article 3*

#### **Repeal**

1. This Decision shall repeal Administrative Circular 1/2012 of 10 January 2012 on teleworking.
2. References to Administrative Circular 1/2012 of 10 January 2012 on teleworking shall be construed as references to Article 5.1bis of the Staff Rules, or, where applicable, to Article 5.1bis of the Rules for Short-term Employment.

#### 2. *Article 4*

#### **Entry into force**

This Decision shall enter into force on the first day of the month following its communication on the ECB’s intranet.

Done at Frankfurt am Main, DD MM 2014.

*The President of the ECB*

Mario DRAGHI

## Annex 2 – Action plan

Implemented and on-going (including on-going efforts with stakeholders involved)

Action	Status of implementation <sup>5</sup>	Involvement/Responsibility
<i>Direct measures</i>		<i>stakeholder</i>
Publication of gender targets	1. IMPLEMENTED	DG/H
1. internally		
2. externally	2. With DG-C	DG/C
For all vacancies as of H-band, Business Areas and DG/H representatives systematically make extra efforts to identify potentially suitable women and encourage them to apply.	IMPLEMENTED	Business areas and DG/H
For all campaigns for H-band positions and above, advertise vacancies externally if:	[...]	EB
1. [...]		
2. the positions are in the core supervisory part of the new SSM function.	2. IMPLEMENTED	DG/H
Make use of existing women networks and dedicated communication channels when advertising positions externally.	ON-GOING	Business areas and DG/H
[...]	[...]	Business areas and DG/H

<sup>5</sup> Traffic light indicators: green: implemented or on-going; yellow: in progress and within the time frame; red: delayed

Action	Status of implementation <sup>5</sup>	Involvement/Responsibility
For all campaigns for H-band positions and above, put more emphasis on competencies rather than on expertise only.	ON-GOING	Business areas and DG/H
<i>Indirect measures</i>		
Select/nominate up to two Diversity Ambassadors, preferably at senior and mid-management level, per Business Area:	PROPOSAL ATTACHED FOR APPROVAL.	
<p>Introduce accountability of managers towards gender diversity:</p> <ol style="list-style-type: none"> <li>1. Enhance the appraisal discussion of managers, by explicitly including the topic of gender diversity,</li> <li>2. Introduce specific questions in the Multi Source Feedback exercise, evaluating commitment to (and results achieved in) gender diversity,</li> <li>3. Include “embracing gender diversity” in managerial role profiles, with subsequent incorporation into HR processes (recruitment of managers).</li> </ol>	<ol style="list-style-type: none"> <li>1. IMPLEMENTED</li> <li>2. IMPLEMENTED</li> <li>3. By next appraisal exercise - IN PROGRESS</li> </ol>	DG/H
<p>Mentoring program:</p> <ul style="list-style-type: none"> <li>• Turn the pilot programme into a permanent offer,</li> <li>• Relax eligibility criteria for the programme,</li> <li>• Allow a wider target group of staff members (in terms of salary bands) to be part of the programme as mentees.</li> </ul>	September 2014 – IN PROGRESS	DG/H
<p>Training:</p> <ul style="list-style-type: none"> <li>• Introduce developmental training on management skills (for women),</li> <li>• Pay attention to gender diversity issues in future (senior) management training to increase awareness and commitment.</li> </ul>	January 2014 – IN PROGRESS	DG/H

Action	Status of implementation <sup>5</sup>	Involvement/Responsibility
<p>Working time:</p> <ol style="list-style-type: none"> <li>1. Allow for 5 days of teleworking per month,</li> <li>2. More opportunity for flexible working arrangements, part-time arrangements and position-sharing at management level,</li> <li>3. Include a sentence in vacancy notices to indicate whether the advertised position is compatible with a part-time arrangement or not,</li> <li>4. Move away from a culture of working late, by appreciating starting early as much as working late, by focusing on output and not on the hours put into a task. Meetings should be scheduled to take place between 9 a.m. and 6 p.m. at the latest.</li> </ol>	<ol style="list-style-type: none"> <li>1. CONSULTATION PROPOSAL ATTACHED FOR APPROVAL</li> </ol>	Business areas and DG/H
	<ol style="list-style-type: none"> <li>2. To be embedded by business area management</li> </ol>	
	<ol style="list-style-type: none"> <li>3. IMPLEMENTED</li> </ol>	
	<ol style="list-style-type: none"> <li>4. To be embedded by business area management</li> </ol>	

## **Annex 3 - Diversity Ambassadors**

### **Mandate**

Diversity Ambassadors act as advocates of gender related issues in their own business area, and help fostering a culture of inclusion and promote equal opportunities.

The initial tenure of a Diversity Ambassador is for a 3-year term which is renewable once and each business area appoints at least one, ideally two representatives acting in this role. A possible overall tenure of 6 years will ensure that progress is monitored throughout the reference period set for achieving the ECB – wide gender diversity targets.

### **Main activities and tasks**

- help defining targets for business areas while paying due regard to local realities;
- raise awareness of and monitor gender-related issues;
- oversee and contribute to the local implementation of action measures (e.g. in recruitment panels, appraisal discussions, etc.);
- report on progress made by business areas in reaching their individual targets, identify areas where progress is (not) achieved, analyse the root causes and make recommendations;
- support the implementation of measures to foster gender diversity and strengthen commitment;
- participate in and/or organise internal events dedicated to gender-related issues;
- partner with the female network in the ECB;
- set-up their network of Diversity Ambassadors in the ECB, develop common activities.

### **Profiles**

- one senior manager and one junior or mid-management-level representative at J or I-band;
- one female and one male (to ensure a balanced composition, if possible at all given business Area realities);
- are willing to advocate the case, are accountable and display commitment;
- take a broad perspective in dealing with gender diversity related aspects.

## **Nomination process**

By 31 October 2013, the head of each business area is requested to nominate two managers or advisers in his business area.

## Annex 4

### Gender Diversity Indicators for monitoring the achievement of intermediate targets

Diversity indicators are provided to monitor the achievement of intermediate targets per business area. Both quantitative and qualitative elements are considered.

#### Recruitment process:

- percentage of female applications;
- percentage of shortlisted female candidates;
- percentage of successful female candidates (direct appointments and short-term promotions)
- the number of internal and external vacancies at I bands and above (including calls for expression of interest) which have been advertised in the respective business area per calendar year;
- the number of successful candidates (direct appointments and short-term promotions) and a corresponding break down by gender;
- percentage of campaigns with at least 2 females in the selection committee campaign as mentioned above.

#### Staff Development:

- number/percentage of female mentees and mentors;
- number/percentage of female staff on internal or external mobility.

#### Working time and leave:

- number/percentage of teleworking days granted to male/female employees;
- number of male/female employees who work part-time.