

FUNDACIÓN UNIVERSITARIA SAN PABLO CEU

II GENDER EQUALITY PLAN 2023-2027



Madrid, March 30, 2023

Signed by acting Consultant:

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Signature:

In....., on.....2023

FUNDACIÓN UNIVERSITARIA SAN PABLO CEU

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Madrid, March 30, 2023

**Signed by the Gender Equality Commission: GENDER EQUALITY PLAN
2023-2027 OF FUNDACIÓN UNIVERSITARIA SAN PABLO CEU.**

Representation Organization

Representation Template

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1. INTRODUCTION

The Gender Equality Plan of FUNDACIÓN UNIVERSITARIA SAN PABLO CEU, is based on the law in force, in particular, the provisions of Organic Law 3/2007, of March 22, for the Effective Equality of Women and Men, as well as in Royal Decree Law 6/2019, of March 1, on urgent measures to guarantee equal treatment and opportunities between women and men in employment and occupation.

According to Article 46 of Organic Law 3/2007, of March 22, for the Effective Equality of Women and Men, the equality plans of companies are an ordered set of measures, adopted after a diagnosis of the situation, aimed at achieving equal treatment and opportunities between women and men in the organization and eliminating discrimination based on gender.

The equality plans will establish the specific gender equality objectives to be achieved, the strategies and practices to be adopted for their attainment, as well as the establishment of effective systems for monitoring and evaluating the objectives set.

In order to achieve the objectives set, equality plans may cover, among others, the areas of female under-representation, access to employment: selection and hiring, professional classification, professional promotion and training, remuneration, coresponsible exercise of the rights of reconciliation of personal, family and working life, working conditions/working time organization to favor, in terms of gender equality between women and men, and prevention of sexual harassment and harassment based on sex.

As stated in art. 3 of Organic Law 3/2007, the principle of equal treatment between women and men implies the absence of any direct or indirect discrimination based on gender, especially those derived from maternity, the assumption of family obligations and marital status.

With this Equality Plan, we hope to continue working on the integration of the principle of equal opportunities and treatment in the management of the people of the SAN PABLO CEU UNIVERSITY FOUNDATION and with it continue to improve the work environment and labor relations, the personal satisfaction of the workforce, their quality of life and occupational health.

1.1. LEGAL FRAME OF REFERENCE

Equality between women and men is a universal legal principle recognized in various international human rights texts.

defined the general objective, the specific objectives and the actions contemplated in the FUNDACIÓN UNIVERSITARIA SAN PABLO CEU Equality Plan.

At the international level:

- Charter of the United Nations (San Francisco, June 26, 1945).
- Universal Declaration of Human Rights. Proclaimed by the United Nations General Assembly on December 10, 1948.
- International Labor Organization (ILO) Conventions: Convention concerning Discrimination in Respect of Employment and Occupation, 1958; Workers with Family Responsibilities Convention, 1981; Convention concerning

maternity protection of the year 2000.

- The United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), approved by the United Nations General Assembly in December 1979 and ratified by Spain in 1983.
- Resolution of the United Nations Commission on Human Rights of 1997.

At the European level:

Equality is also a fundamental principle in the European Union.

affirmative action measures.

Since the entry into force of the Treaty of Amsterdam on May 1, 1999, equality between women and men and the elimination of inequalities between women and men have been an objective to be integrated into all policies and actions of the Union and its member countries.

- Treaty of Rome (25/03/1957) establishing the European Economic Community. Art. 14 introduces the principle of equality and non-discrimination on grounds of sex. Art 114 (ex 119) includes the principle of equal treatment between women and men as the right to equal pay for equal work or work of equal value. Under the protection of former Article 111, the Community acquis on gender equality of great breadth and importance has been developed, and the Spanish Organic Law 3/2007, of March 22, for the effective equality of women and men, is largely aimed at its adequate transposition.
- Treaty on European Union (Maastricht, 09/02/1992), Article 6 provides that the principle of equality shall not prevent the Member States from adopting

- In particular, Organic Law 3/2007 incorporates into Spanish law two directives on equal treatment: 2002/73/EC, amending Directive 76/207/EEC on the implementation of the principle of equal treatment for men and women as regards access to employment, vocational training and promotion, and working conditions; and Directive 2004/113/EC on the implementation of the principle of equal treatment for men and women in the access to goods and services and supplies.

- Recommendation of the Commission, 27-XI-91 on the protection of the dignity of women and men in the workplace. Code of Conduct to combat sexual harassment.
- Recommendation of the Committee of Ministers of the Council of Europe on the non-sexist use of language, pursuant to Article 15.b of Statute of the Council of Europe, approved on February 21, 1990.
- Community action programs for equal opportunities between women and men.
- Report from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions of 22 February 2006 on equality between women and men.
- Recommendations of the Lisbon European Council, 2006.
- European Directive 2006/54 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation.
- Recommendation of the Committee of Ministers on the protection of women against violence.
- Community framework strategies on gender equality.
- Work Plan for equality between women and men (2014-2017).
- European Parliament Resolution of June 17, 2010, on the gender dimension of the economic recession and financial crisis.
- European Parliament Resolution of September 7, 2010, on the role of women in an aging society.
- Council of Europe 2014, Istanbul Convention. International treaty to address violence against women.

At the National level,

- Article 14 of the Spanish Constitution proclaims the right to equality and non-discrimination on grounds of sex, birth, race, religion, opinion or any other personal or social condition or circumstance, and Article 9.2 establishes the obligation of the public authorities to promote the conditions for the equality of individuals and of the groups in which they are integrated to be real and effective.
- Royal Legislative Decree 2/2015 of October 23, which approves the revised text of the Workers' Statute. Article 17.
- Law 39/1999, of November 5, 1999, to promote the reconciliation of work and family life.
- Royal Decree 1251/2001, which implements part of the law on the reconciliation of family and work life.
- Organic Law 1/2004, December 28, on Comprehensive Protection Measures against Gender Violence.
- Law 39/2006, of December 14, on the Promotion of Personal Autonomy and Care for Dependent Persons.
- State Equal Opportunity Plans in the process of being drawn up the Strategic Plan for Equal Opportunity

Equal Opportunities 2018-2021, which is being negotiated to include measures against the wage gap, mandatory registration of equality plans, among others.

- Organic Law 3/2007, of March 22, for the effective equality of women and men.
- Law 9/2017, of November 8, on Public Sector Contracts, transposing into Spanish law the Directives of the European Parliament and of the Council 2014/23/EU and 2014/24/U, of February 26. Entry into force on 09/03/2018.
- Law 11/2018, of December, which amends the Code of Commerce, the revised text of the Capital Companies Act.

approved by Royal Legislative Decree 1/2010, of July 2, and Law 22/2015, of July 20, on Account Auditing, on non-financial information and diversity.

- Royal Decree-Law 6/2019, of March 1, on urgent measures to guarantee equal treatment and opportunities between women and men in employment and occupation.
- Royal Decree 901/2020, of October 13, which regulates equality plans and their registration and amends Royal Decree 713/2010, of May 28, 2010, on the registration and deposit of collective bargaining agreements.
- Royal Decree 902/2020, of October 13, on equal pay for men and women.

At the regional level

GALICIA:

- Legislative Decree 2/2015, of February 12, approving the revised text of the legal provisions of the Autonomous Community of Galicia on equality.

MADRID:

- Law 2/2016, of March 29, on gender identity and expression and social equality and non-discrimination of the Community of Madrid.
- Law 5/2005, of December 20, against gender violence of the Community of Madrid.

MURCIA:

- Law 7/2007, of April 4, for Equality between Women and Men and Protection against Gender Violence in the Region of Murcia.

VALENCIA:

- Law 9/2003, of April 2, of the Generalitat Valenciana for Equality between women and men.
- Law 7/2012, of November 23, integral against violence against women in the Valencian Community.

BASQUE COUNTRY:

- Law 4/2005, of February 18, 2005, on Equality between Women and Men

Applicable collective bargaining agreements:

- XIII Statewide Collective Bargaining Agreement for University Education and Research Centers.
Code No. 99000995011982. Official State Gazette (BOE) 21/07/2012.

- X National collective bargaining agreement for private education centers under the general system or regulated education without any subsidized or subsidized level.

Code No. 9900192525011986. BOE 11/07/2018.

- VI Collective bargaining agreement for private education companies supported in whole or in part by public funds.

Code No. 99008725011994. BOE 17/08/2013.

- Collective bargaining agreement for social initiative education centers in the Autonomous Community of the Basque Country.

Code No. 8602645. Official Gazette of the Basque Country (BOPV) 04/08/2009.

- Collective bargaining agreement for the sector of hospitalization health establishments, health care, consulting rooms and clinical analysis laboratories (Madrid).

Code No. 2800157575011982). Official Gazette of the Community of Madrid (BOCM) 19/05/2018.

- Collective labor agreement for the sector of stomatologists and dentists in the province of Valencia.

Code No. 4600445555011994. Official Gazette Province of Valencia 07/11/2018.

2. MANAGEMENT COMMITMENT

The Management of FUNDACIÓN UNIVERSITARIA SAN PABLO CEU declares its commitment to the establishment and development of policies that integrate equal treatment and opportunities between women and men, without discriminating directly or indirectly on the basis of sex, as well as to the promotion and encouragement of measures to achieve real equality within our institution, establishing equal opportunities between women and men as a strategic principle of our Corporate and Human Resources Policy, in accordance with the definition of this principle established in Organic Law 3/2007, of March 22, for effective equality between women and men.

In each and every one of the areas in which the activities of this organization are carried out, from recruitment to promotion, including salary policy, training, working and employment conditions, occupational health, organization of working time and conciliation, prevention and action against sexual harassment and harassment based on gender, and the non-discriminatory use of language, communication and advertising, we assume the principle of equal opportunities between women and men, paying special attention to indirect discrimination, this being understood as *"the situation in which a provision, criterion or practice*

seemingly neutral, puts a person of one gender at a particular disadvantage with respect to persons of the other sex."

Regarding communication, both internal and external, all decisions taken in this regard shall be reported and an image of the organization shall be projected in accordance with this principle of equal opportunities between women and men.

The principles enunciated will be put into practice through the implementation of an Equality Plan that implies improvements with respect to the present situation, arbitrating the corresponding follow-up systems, with the purpose of advancing in the achievement of real equality between women and men in the entity and, by extension, in society as a whole.

In order to carry out this purpose, the legal representation of male and female workers or, failing that, the workers themselves, will be involved, not only in the collective bargaining process, as established in Organic Law 3/2007 for effective equality between women and men, but also in the whole process of preparation, monitoring and evaluation of the Gender Equality Plan, according to RDL 6/2019 and RD 901/2020 and 902/2020.

3. CONCLUSIONS SITUATION DIAGNOSIS

The organization has negotiated with the legal representation of the staff, within the Gender Equality Commission (section

9), the Diagnosis of the situation in terms of gender equality.

The conclusions obtained are as follows:

ORGANIZATIONAL MANAGEMENT/COMMITMENT TO GENDER EQUALITY

The organization states that Equality of treatment and opportunities is part of its founding principles, although it does not

have any specific has no specific or explicit commitment in this regard.

CHARACTERISTICS OF THE TEMPLATE

FUNDACIÓN UNIVERSITARIA SAN PABLO CEU has a workforce of **3,146 people**, **58.20%** of whom were **women and 41.80% men**, close to a balanced composition; this is the proportional distribution that we will use as a reference to measure quantitative equality between both sexes/genders¹.

The presence of women in teaching in the education sector stands at 66.5%, with 71.99% in non-university education and 41.3% in university education; FUSP CEU is located in the range created between the two references provided.

The **gender representation gap is 16.40% in favor of women** (equality reference value: 0%). The **ratio** between the number of women and men is **1.39, which indicates** that it is a workforce with a higher representation of women, exceeding the reference value for equality (1), typical of the

sector. Thus, the results of these indicators will be the reference for the different parameters of analysis in this diagnosis.

The management team is composed of five women and six men. This is evidence of a balanced composition, according to the First Additional Provision of Organic Law 3/2007, for the effective equality of men and women. However, the result is also indicative of a certain lower representation of women at this level and of an inversion of the weights of representativeness with respect to those of the staff (58.20%/41.80%).

¹ Organic Law 3/2007, for the effective equality of women and men, in its First Additional Provision. Balanced presence or composition: a balanced composition is understood to mean that the number of persons of each sex does not exceed 60% and is not less than 40%. However, the reference proportionality will be established by the parameter set by the presence of women and men in the workforce, as a distribution criterion.

Distribution of the workforce by services/work centers.

- It can be seen that the highest concentration of personnel is found at Universidad San Pablo CEU-Madrid with 31.66% of the staff, 54.92% of whom are women and 45.08% men, followed by 28.13% at Universidad CEU-UCH-Valencia, with 55.48% women and 44.52% men; both are very close to the existing distribution criterion in the staff, although the representation of women is lowered in favor of men.

It is worth highlighting the greater presence of women in the workforces of all the centers, being those with the highest representation in terms of the ratio of women to men of 1.39 out of the total workforce:

- Dental Clinic of Valencia with an index of 13.
- ISEP Levante with a score of 7
- Vigo Teacher Training College, 5.60.

And there is only one center with lower representation of women compared to men, according to the ratio index:

- Universidad EU Cardenal Herrera University of Castellón, with a ratio index of 0.85.

Resulting in a situation of equality:

- ISEP Madrid with a female to male ratio of 1.

Distribution of the workforce by nationality.

- Of 24 nationalities present in the organization, 97.08% of the workforce is Spanish (58.19% women and 41.81% men).

Distribution by area of activity.

- The area of activity that most closely approximates the distribution criteria

The overall number of employees is "V.T." with 56.25% / 43.75%, followed by "Universities" (55.78% / 44.22%).

- The ratio of women to men is less representative of women than men only in "Corporate Management", although it should be noted that it is very close to equality.
- There is a higher representation of women in all other areas, with the highest representation in "Postgraduate" and "Colleges".

Distribution of the workforce by group.

- No group is positioned in the existing distribution criterion in the workforce, being the one that comes closest, although it lowers the weight of representation of women in favor of men, that of "TEACHERS" (55.52% / 44.48%); The "PAS" group shows an increase in the representation of women (66.33%/33.67%). This group is characterized by a greater representation of women in the sector.
- According to the ratio of women to men, the MANAGEMENT group shows a lower representation of women in line with the gender gap it generates (-0.47%). However, it should be noted that it is very close to equality.

Distribution by professional categories.

- 5 are the categories that result with an equal representation of 50% women / 50% men and, therefore, there is no gender gap as the result is 0%:

- Kitchen Assistant
 - Extracurricular Coordinator
 - Physiotherapist
 - Senior Manager
 - Webmaster
- 48 categories (65.75%) of the 73 categories applied show a greater presence of women than men, with those with the highest representation standing out, for example:
- Administrative assistant: 92.00 % women / 8.00 % men
 - Language instructor: 92.31% women / 7.69% men
 - Prof. of Early Childhood Education: 98.04% women / 1.96% men
 - In addition to all those without male representation.
- The remaining 20 categories (27.39%), have a greater presence of men than women, such as:
- Laboratory Assistant: 20.00% female / 80.00% male.
 - Cook: 25.00% women / 75.00% men.
 - Draughtsman: 00.00% women / 100.00% men.
- Highlight the manifestation of the low presence of women in STEM studies.

information on the monitoring phase of the implementation of the equality plan and updating of annual data on equality.

Distribution of the workforce by seniority.

- In this analysis parameter, there is a greater representation of women in all the seniority intervals, with the lowest seniority ("Less than 6 months") being the one with the highest representation of women and, therefore, the one with the greatest distance from equality, in favor of women.
- The seniority interval that is closest to the existing distribution criterion in the workforce is "3-5 years" (57.04%/42.96%).

It is interesting to analyze the level of satisfaction with the job and the organization, in addition to the work environment or working conditions, of those people who are located in the bands of 6 years and older.

Distribution of the workforce by level of education.

- At the time the information for this diagnostic report was collected, this information was not available in the terms required, so it is proposed to complete this parameter in the following terms.

STAFF PARTICIPATION AND INVOLVEMENT

- The organization guarantees the right to union membership of workers, as well as freedom of association as shown by the existing representation.

- The organization will promote the constitution of the Gender Equality Commission, whose mission is to validate and negotiate the Diagnosis Report and Equality Plan, as well as to watch over its implementation, monitor it and detect new potential inequalities.

COMMUNICATION AND USE OF LANGUAGE

In the preliminary analysis, both internally and externally, there is evidence of integration of the perspective

The gender perspective in some of the communication tools used, although in others it has not been done.

EQUAL PARTICIPATION IN THE WORKPLACE

SELECTION AND HIRING PROCESSES

- With respect to the gender indicators shown by the staff, in the incorporations of the last year, the weight of representation of women has increased and that of men has decreased. the of men (60.04%/39.96%), generating a gender gap and a ratio between the number of women and men with a greater representation of women.
- Therefore, the trend in hiring is in line with the maintenance of the existing gender reality in the workforce.
- By type of contract: 42.74% of the workforce hired in the last year has been in the "Part-time temporary" modality, corresponding to 53.73% of women and 46.27% of men.
- 18.64% in the modality of "Full-time temporary",

The gender indicators in this modality are farther apart from those of the reference group of the workforce.

- Only in the "Permanent/Discontinuous" modality are the weights of representation reversed in favor of men, generating less representation of women.
- In the "Indefinite part-time" modality (52.08% / 47.92%) the results in the gender indicators are close to equality.
- The types of hiring and their distribution of representativeness are in line with those existing in the workforce in general, so the tendency is to maintain the characteristics of the reality we are analyzing. It should be borne in mind that new hires are becoming mechanisms that

could contribute to break the trend of representativeness based on stereotypes and gender roles existing in the Institution, according to the times and margin of action by the Institution in the operating market.

With respect to the hiring by ETT:

- There is an increase in women's representation

(61.50%/38.50%) with respect to the staffing benchmark.

- It would be interesting, in the near future, to deepen the knowledge of the of the areas of activity and professional categories in which they have been incorporated.

PROFESSIONAL PROMOTION

- The results are very close to those obtained by the staff (58.20% / 41.80%), with a small increase in the representation of women promoted in the 2018/2019 academic year.
- Of those promoted, 65.63% were promoted by "level progression", with 65.63% of women and 36.90% of men.
- The remaining 34.83% is for "Academic category promotion", reducing the weight of representation of women (54.55%) and increasing that of men (45.45%), with respect to the reference criterion for staff.
- 54.55% of the promotions have been to "Assistant Professor", corresponding to

The number of female and male employees is 58.33% and 41.67% respectively, practically complying with the staff distribution criterion.

- It should be noted that while in all categories there is a greater representation of women, according to the existing staff, in the case of "Professor", there is less representation, inverting the weights of representation in favor of men. Manifestation of vertical segregation.
- The gender gap results are in favor of women in all categories, with the exception of the highest category "Professor", which is in favor of men.

TRAINING

- The total number of hours of training carried out increases the weight of representativeness in favor of women, exceeding the criterion of the workforce, lowering that of the hours carried out by men.
- Only in the "Career Development" typology is there a

The argumentation for this can be aligned with the need for training of those profiles to be promoted to levels of responsibility, which could precisely be responding to gender roles.

- In the rest of the typology there is an overrepresentation of women, especially in "Technical Specialization" and "Generic Training", approaching the reality of the workforce in "Transversal".
- Of the total number of training hours, 64.08% were invested in cross-cutting training (interpersonal skills, regulations, CEU, etc.).

The number of women's hours was 58.45% and 41.55% of men's hours, in exact compliance with the criterion of staff distribution.

- The Institution has a training plan that has included specific training on equality for some profiles.

PRESENCE OF WOMEN IN POSITIONS OF RESPONSIBILITY

It is a reality of practically equal representativeness, with values in all indicators that corroborate this situation.

However, it should be noted that this is far from the distribution criterion offered by the staff, where there is a greater representation of women than men (58.20%/41.80%), being the reference to which to aspire.

SALARY POLICY: REMUNERATION

With respect to the consolidated average fixed compensation, the average deviation/gender gap is as follows:

- In favor of women in all groups/areas of activity that show a negative result, earning more than their colleagues in the resulting percentage, in "SCHOOLS": "PAS" (9%) and "Profesor" (2%), in "V.T.": "Professor" (55%), in "UNIVERSITIES": "PAS" (2%) and "PDI" (2%). Associates" (26%).
- In favor of men in those that show a positive percentage, with women earning less than their male counterparts in the resulting percentage.
- Note that in "Management" in "SCHOOLS" there is no deviation whatsoever, resulting in equal salaries in this parameter of analysis.
- The total average fixed remuneration by gender by area of activity and group shows a deviation of 3%, close to a situation of equality (0%).

With respect to the average fixed supplementary remuneration, the average deviation/gender gap is as follows:

- In favor of women in all groups/areas of activity that show a negative result, earning more than their colleagues in the resulting percentage. With the greatest differences in "V.T. Executives", "GRADUATES" and "CORPORATE MANAGEMENT".
- In favor of men in those that show a positive percentage, with women being paid less than their male colleagues in the resulting percentage. The greatest differences occur in "PAS" of "SCHOOLS" and "GRADUATES".
- The total average fixed supplementary remuneration by gender by area of activity and group shows a deviation of 36%, increasing with respect to the previous parameter (consolidated average fixed remuneration).

close to a situation of equality (0%).

With respect to the average remuneration in kind, the average deviation/gender gap, results:

- In favor of women, with a negative result, in "Managers" of "CORPORATE MANAGEMENT", "PAS" of "VT" and "GRADUATES", resulting in the largest existing difference and in "PDI Asociados" in "UNIVERSIDADES".
- In favor of men in those with a positive % result, with women being paid less than their male counterparts as a resultant percentage.
- The total average compensation in kind by gender by area of activity and group shows a deviation of 29%, increasing with respect to the consolidated fixed average compensation parameter of 3%, close to a situation of equality (0%).

With respect to the average total compensation, the average deviation/gender gap results:

- In favor of women in all groups and areas of activity that show a negative result, earning more than their colleagues in the resulting percentage.
- In favor of men in those with a positive percentage,

RESULTS OF THE COMPENSATION AUDIT:

In accordance with the stipulations of Royal Decree 902/2020 regarding the need to prepare a salary audit aimed at eliminating salary discrimination based on sex, the results obtained from the audit are shown below:

women are paid less than their male counterparts as a percentage.

- It can be seen that the "School Teacher" group results in a 0% salary difference, due to a calculation adjustment, with the average salary for women being 125.07 euros higher.
- The total average total remuneration by gender by area of activity and group shows a deviation of 6%, increasing with respect to the consolidated fixed average remuneration parameter of 3%, close to a situation of equality (0%) and well below the overall total deviations shown by the parameters of average complementary remuneration (36%) and average remuneration in kind (29%).

If necessary, this section is subject to revision approved the regulation of Royal Decree Law 6/2018, of March 1, on urgent measures to guarantee equal treatment and opportunities between women and men in employment and occupation, which introduces the obligation to carry out salary audits and registration with the average values of salaries, salary supplements and extra salary payments of the workforce, disaggregated by sex and distributed by professional groups, professional categories or job position of equal or equal value.

METHODOLOGY

This audit has followed a methodology that allows the grouping of positions of equal value, in the terms indicated in Article 28 of the Workers' Statute and Article 4 of Royal Decree 902/2020.

The information in this audit was extracted from the people management system (Workday) for the total number of active employees as of May 25, 2022, with information and individualized for each person, including the following data:

- Personal and contractual data - ID, name, seniority date, category.
- Organizational data: Main position, job family, level and remuneration position.
- Total compensation: Calculation of all compensation items (Fixed Compensation, Functional Complement and Additional Compensation).

With the data extracted, the information has been grouped by Family and Job Level (in the case of university teaching and research staff, their salary position has been taken into account), and in all cases, the information has been disaggregated by gender.

The arithmetic mean of each grouping was then calculated, detecting those levels with differences greater than $\pm 25\%$ between the mean for men and women.

The following information is analyzed at the levels where the salary gap has been observed, as indicated above, in order to detect possible causes:

- Contractual - Category and seniority of the person.
- Leveling - Checking the leveling of the position with reference to other positions of equal value.
- Remuneration - Salary concepts and amounts. Historical remuneration.

TERMINOLOGY

Job Family

Job families are areas of activity and management that exist in Fundación Universitaria San Pablo CEU (FUSP). They gather a homogeneous set of activities that are similar from a strategic point of view. This hierarchization of positions favors the organization and efficiency of the companies.

At FUSP, we have the following Job Families: / Corporate / Colleges / Professional Training / Universities / Postgraduate /

Levels

Each family of positions is organized in levels from less to more complex functions and responsibilities. Level 1 is the most complex and level 12 is for operational or low complexity positions. This leveling makes it possible to group positions of equal value,

Remuneration positioning

In the University/Teaching family of positions, we use the remuneration positioning to place each person within the PDI development and evaluation system (Docentia+CEU) under criteria of excellence and continuous improvement. This development system is applied to the positions of Professor, Full Professor, Associate Professor, Collaborator Doctor, Collaborator Graduate.

Main position

At FUSP, individuals may occupy more than one position. We assign to the employee as "main position" the one

whose position level is of a higher entity or responsibility.

Remuneration

For this fiscal year we have taken into account the following compensation items

- (FR) Fixed Remuneration - This groups together salary items received by the employee on a consolidated basis.
- (FC) Functional Complement- Amounts associated with the performance of a position.
- (AR) Additional Remuneration - Non-consolidated remuneration of a different nature (extraordinary collaborations, tutoring, etc.).

EQUAL WORKING CONDITIONS

Contracting modality:

By type of contract:

- 74.48%, of which 57.18% are women and 42.82% are men, are in the "Fixed/Indefinite" category, with the distribution of representation being practically the closest to the existing distribution criterion in the workforce (58.20%/41.80%).
- 21.07% of the workforce is located in "Temporary" where 61.94% are women and 38.06% men, increasing the weight of women's representation.
- The rest of the staff is distributed less significantly in the "Internship" and "Apprenticeship" modalities.

RESULTS

In view of the study carried out and after analyzing the aforementioned data, it is verified that there are no wage gaps between men and women, given that the cases detected in which the arithmetic mean or median of the total remuneration in the company of workers of one sex is higher than that of the other by at least twenty-five percent do not respond to reasons related to the sex of the workers, but are justified by other reasons, as indicated in this document.

However, an action plan will be drawn up as part of the positive actions indicated in the corresponding section.

Of the total workforce:

- The highest concentrations of both women and men are in the "Fixed/Indefinite" category.
- In the case of the "Temporary" modality, 22.33% of women are in this modality compared to 19.30% of men, although it should be taken into account that this is a modality present in the educational reality in the composition of the workforce.

By number of hours of the day:

- 56.22% is located in the "36-39 hours" working day, corresponding to 58.89% of women and 41.11% of men, reducing the weight of women's representation in favor of an increase in men's, according to the staff distribution criterion.
- 42.01% are in "Less than 20 h" (49.53%/50.47%) and "20-35 hours" (70.69%/29.31%).
- 1.77% are in the "40 hours" category, 65.52% of which corresponds to women and 34.48% to men.

The value that comes closest to equality, with 0.98, is found in the "Less than 20 hours" workday, characterized by a slightly lower representation of women, with an increase in the representation of men.

Due to definitive cancellations:

- In all the typology, with the exception of "Termination of contract", the weight of representation of women increases to the detriment of men, moving away from the criterion of distribution of the workforce (58.20%/41.80%).
- The highest concentration of employees on sick leave has been in

The number of employees leaving the company was 44.24% for "Termination of contract", 56.25% of whom were women and 43.75% men, and 34.10% for "Voluntary Termination", 62.16% of whom were women and 37.84% of whom were men, increasing the weight of women's representation with respect to the reference workforce.

- It is worth noting the higher representation of women in "Retirement", being education one of the few sectors where this situation occurs, as it is historically a sector with a high presence of women.
- "Dismissal" and "Voluntary Dismissal" are situations that should be analyzed in detail in order to know the causes that lead to the departure, to detect which are the reasons that could be related to situations experienced in the workplace and/or incompatibilities with personal/family/work life.

CO-RESPONSIBLE EXERCISE OF THE RIGHTS OF RECONCILIATION OF PERSONAL, FAMILY AND WORK LIFE

- 36.46% of the workforce is between 46-59 years of age, 52.83% of whom are women and 47.17% men.
- 33.63% are between 36-45 years of age (59.26% /40.74%).
- 21.87% are between 21-35 years of age (68.17% / 31.83%), increasing the weight of representation of women to the

detriment of men, with respect to the staff distribution criterion (58.20%/41.80%).

- These intervals correspond to a vital stage where the assumption of family responsibilities is very present; therefore, it is necessary to recognize the needs that are linked to these responsibilities in order

to contribute to the development and implementation of work-life balance measures deployed by the organization to facilitate the reconciliation of personal, family and work life, and promote the co-responsible exercise of these rights.

- The total number of uses of reconciliation measures increases the weight of representation of women to the detriment of men, with this diagnostic parameter showing the greatest increase in the representativeness of women, as the number of uses exceeded the reference criterion of the workforce (58.20%/41.80%).

- From these measures, The highest concentrations by gender are in:

- In women, 45.03% were for "Maternity", followed by 36.26% for "Reduction of working hours to care for a child".
- In men: 77.78% in "Paternity", dropping to 11.11% in "Voluntary leave", 7.41% in "Reduction of working hours for child care".

HEALTH AND OCCUPATIONAL HAZARDS. PREVENTION OF SEXUAL AND GENDER-BASED HARASSMENT

- 94.12% of the situations were due to "Common illness", with 74.73% of women and 25.27% of men.
- In "Accidents at Work", the representation of women is reduced in favor of an increase in the representation of men, according to the criterion of distribution of the workforce.
- An occupational risk prevention plan is in place risk prevention plan is in place, and studies have been carried out to detect needs related to occupational health and safety at work, from

which there are no different needs between women and men.

- The organization has a "Protocol of Action against Moral and Sexual Harassment", dated March 9, 2010, which requires revision from a gender perspective.
- The occupational health or occupational risk prevention measure aimed specifically at women is the CEU-WOMAN Plan (specific within the Health Promotion Plan).

GENDER VIOLENCE

The organization is not aware of any situations that could be affected by this scourge.

MOBILITY

It does not have a Mobility Plan.

4. GENERAL OBJECTIVE

Promote the development of an organizational culture in favor of the strategic integration of the principle of equal treatment and equal opportunities in the management of its human capital, incorporating for this purpose the

gender perspective and other diversity factors in all its internal and external procedures, thus expanding its CSR strategy in the social sphere.

5. SCOPE OF APPLICATION AND VALIDITY OF THE EQUALITY PLAN

PERSONAL LEVEL:

The Equality Plan of FUNDACIÓN UNIVERSITARIA SAN PABLO CEU will be of application to all current work centers, affecting 100% of the workforce.

TERRITORIAL SCOPE:

The territorial scope shall include the following work centers:

Center	Province	AC	No. of workers
Universidad CEU San Pablo	Madrid	Madrid	1.367
Universidad CEU Cardenal Herrera	Valencia, Castellón, Elche	Valencia Community	1.396
CEU University Teacher Training School of Vigo	Vigo	Galicia	34
Montepríncipe CEU School	Madrid	Madrid	142
Claudio Coello CEU School	Madrid	Madrid	31
Sanchinarro CEU School	Madrid	Madrid	173
Valencia CEU School	Valencia	Valencia Community	82
Jesús María CEU School	Alicante	Valencia Community	109

Murcia CEU School	Murcia	Murcia	66
Virgen Niña CEU School	Vitoria	Basque Country	76
ISEP Madrid	Madrid	Madrid	64
ISEP Levante	Valencia	Valencia Community	18
USP Polyclinic	Madrid	Madrid	43
Odnatology Clinic	Valencia	Valencia Community	26
Clinical Veterinary Hospital	Valencia	Valencia Community	33
Castilla León Business School	Valladolid	Castilla and León	3
Corporate Management	Madrid	Madrid	191

TEMPORAL SCOPE:

This Gender Equality Plan will enter into force at the moment it is registered, maintaining its validity for a period of 4 years. Six months before the end of this Plan, the process of negotiation of the next Gender Equality Plan will be carried out, based on the annual follow-up reports and final evaluation of the present Plan, as well as the update of the situation diagnosis.

MODIFICATION PROCEDURE:

The gender equality plan must be reviewed whenever the following circumstances occur:

- a) When it must be done as a consequence of the results of the planned monitoring and evaluation.
- b) When their lack of compliance with legal and regulatory requirements or their insufficiency is revealed as a result of the actions of the Labor and Social Security Inspection.
- c) In the event of merger, absorption, transfer or modification of the legal status of the company.
- d) In the event of any incident that substantially modifies the workforce, its working methods, organization or remuneration systems, including the implications of collective bargaining agreements and substantial modifications to working conditions or the situations analyzed in the diagnosis of the situation that served as the basis for its preparation.
- e) When a court decision condemns the company for direct or indirect discrimination based on sex or when it determines the lack of adequacy of the gender equality plan to legal or regulatory requirements.

The Monitoring Committee is entitled to address the modification as a), that is, when it must be made as a consequence of the monitoring and

evaluation. The Monitoring Committee, based on the monitoring of the equality plan's measures, may review them at any time during its term in order to add, reorient, improve, correct, intensify, mitigate or even stop applying any measure contained therein, depending on the effects that may be observed in relation to the achievement of its objectives.

In order to proceed with the modification of the equality plan as a consequence of letters b), c), d) and e), the constitution of a new Negotiating Committee must be promoted on the basis of the provisions of article 5 of Royal Decree 901/2020, taking into account the representation of the workforce at the time of its constitution, at which time the Monitoring Committee will be dissolved and without effect. This modification will involve the complete updating of the diagnosis, as well as the measures of the equality plan.

In the event of an unsolvable conflict, an external conflict resolution body will be called upon, whose primary purpose is the extrajudicial solution of collective labor conflicts arising between employers and employees or their respective representative organizations, through mediation and arbitration procedures.

6. STRUCTURE OF THE GENDER EQUALITY PLAN

The Gender Equality Plan is structured in the areas analyzed in the Diagnosis of the situation:

6.1.- Organizational management area / Commitment to equality.

that contribute to the fulfillment of the general objective have been defined.

6.2.- Area of access to employment: selection and hiring.

In order to implement these specific objectives, a series of positive actions grouped into measures has been designed.

6.3.- Area of professional classification, professional promotion and training.

That is to say:

6.4.- Remuneration area

SPECIFIC OBJECTIVE	GROUP OF ACTIONS	ACTIONS
	AP1	A.P.1.1.-
		A.P.1.2.-
		A.P.1.3.
		A.P.1.4.

6.5.- Area of co-responsible exercise of the rights of reconciliation of personal, family and work life.

6.6.- Area of occupational health and sexual harassment / harassment due to sex.

6.7.- Area of communication / use of language.

6.8.- Monitoring area.

For each of these areas, the following specific objectives

Organizational Management Area / Commitment to Gender Equality

SPECIFIC OBJECTIVE	GROUP OF ACTIONS	ACTIONS
Materializing the commitment to gender equality in the corporate strategy	AP1.- ORGANIZATIONAL SCOPE AND COMMITMENT TO EQUALITY	A.P.1.1.1.- To update the document on Gender Equality Policy
		A.P.1.2.2.- Verify the existence of the Gender Equality Commission (E.C.) and its functioning.
		AP.1.3. To verify the existence of EC Rules of Functioning.
		A.P.1.4.- To verify accredited training in terms of equal opportunities for people members of the E.C.
		A.P.1.5.- To verify the Equality Agent Designation
		A.P.1.6.- To verify accredited training as a person's Equality Agent designated as such.
		A.P.1.7.- To verify accredited training in Gender Violence of the person designated as A.I.
		A.P.1.8.- To verify accredited training as Expert in Harassment Conflicts of the person designated as I.A.
		A.P.1.9. Registration of the Equality Plan in the Registry of Equality Plans/Conventions.
		A.P.10.-To develop a procedure of coordination of activities that has as its main point of focus the Gender Equality Plan itself and the Sexual Harassment and Gender-based Harassment Prevention Protocol between companies.
		A.P.1.11.- To establish a budget for the area of Equality of the organization that compliance with the Gender Equality Plan.
		A.P.1.12.- To activate the legal requirements protocol.
		AP.1.13.- Communication and review of the Code of Conduct

Employment Access Area: Selection and Hiring

SPECIFIC OBJECTIVE	GROUP MEASUREMENTS	ACTIONS
Expand the review of selection procedures to ensure equal treatment and equal opportunity to contribute to the proportional composition of the workforce.	AP2: ACCESS TO EMPLOYMENT MEASURE: SELECTION AND HIRING	A.P.2.1- Analysis of the access process to ensure equal treatment and opportunities in selection and hiring.

Professional classification, professional promotion and training area

SPECIFIC OBJECTIVE	GROUP OF ACTIONS	ACTIONS
Encourage the presence of women in positions of responsibility and decision-making (according to distribution criteria of the existing staff)	AP 3.- PROFESSIONAL CLASSIFICATION OF ACTIONS PROFESSIONAL PROMOTION AND TRAINING	A.P.3.1.- To establish presence/representativeness indicators of women and men
Incorporate the principle of equality and the gender approach in the Training to contribute to the creation of an environment and culture of work respecting gender diversity, among others.		A.P.3.2.- Establishment of training actions on equality and gender indicators in the design, implementation, dissemination, follow-up and evaluation of training.
		A.P.3.3.3.- Equality awareness training action for the entire workforce.
		A.P.3.4.- Gender Training Action for the Gender Equality Commission.

Remuneration Unit

SPECIFIC OBJECTIVE	GROUP OF ACTIONS	ACTIONS
Design a remuneration policy that guarantees the no discrimination of gender pay	AP 4: MEASURES FOR THE EQUAL PAY	A.P. 4.1. remuneration register incorporating levels resulting from the remuneration audit
		A.P. 4.2.- Implementation of the SGI remuneration management system R-20.

Area of exercise of the rights of conciliation of personal, family and working life

SPECIFIC OBJECTIVE	GROUP OF ACTIONS	ACTIONS
Designing a conciliation policy to facilitate and promote the conciliation of personal, family and work life.	AP 5: ACTION FOR THE EXERCISE OF THE RIGHTS OF CONCILIATION OF PERSONAL, FAMILY AND WORK LIFE	<p>A.P.5.1.- To prepare a catalog of conciliation measures.</p> <p>A.P.5.2.- To establish a system of indicators to monitor access to and use of work-life balance measures.</p> <p>A.P.5.3.- Develop campaigns of awareness and sensitization on family co-responsibility.</p> <p>A.P.5.4.- Commitment with seals and policies that favor the work-life balance.</p>

Area of Occupational Health and Sexual Harassment / Harassment based on Sex

SPECIFIC OBJECTIVE	GROUP OF ACTIONS	ACTIONS
Review the policy on occupational risk prevention and risk assessment considering the principle of equality and the gender approach	AP6: OCCUPATIONAL HEALTH AND PREVENTION OF SEXUAL HARASSMENT/ HARASSMENT BASED ON SEX	A.P.6.1.1.- Conducting occupational risk assessment with a gender perspective.
To materialize the organization's commitment to zero tolerance of Sexual Harassment/Harassment based on sex.		A.P.6.2.- Incorporate and communicate sexual harassment and harassment based on sex within the CEU internal complaint
Establish procedures for prevention and channeling of sexual harassment/harassment based on sex.		A.P.6.3.- Revision of the harassment protocol, updating the part referring to sexual harassment and harassment based on sex.

Communication Area / Use of language

SPECIFIC OBJECTIVE	GROUP MEASUREMENTS	ACTIONS
To disseminate all the commitments made and actions carried out within the framework of this Gender Equality Plan to the entire workforce.	AP 7: ACTION OF COMMUNICATION / USE OF LANGUAGE	A.P.7.1.1.- Dissemination of the Policy on Equality and the Gender Equality Plan.
Contribute to generate a non-sexist use of inclusive language in the cultural framework		A.P.7.2.- Establishment of an Information Plan.
		A.P.7.3.- Elaboration of a Guide of Best Practices and language.

in favor of equality, showing consistency with the commitment, in any internal and external communication process.		
Adapt the systems of internal and external communication of the organization from the gender perspective		A.P.7.4.- Creation/Revision of communication channels for the staff (Suggestion box or similar).

Monitoring Area

SPECIFIC OBJECTIVE	GROUP OF ACTIONS	ACTIONS
To contribute to reinforcing the monitoring of key procedures for the fulfillment of the equality objectives agreed in this plan.	AP8: MONITORING ACTIONS	A.P.8.1.- Training control
		A.P.8.2.- Selection Control
		A.P.8.3.- Staff perception surveys
		A.P.8.4.- Meetings of the Gender Equality Commission
		A.P.8.5.- Internal audits to monitor the equality plan and regulatory compliance.

7. POSITIVE ACTIONS BY AREA ACCORDING TO STRUCTURE

The Organic Law 3/2007, of March 22, for the effective equality of women and men continues to be the frame of reference for our work.

In its Article 11, the philosophy dictated in the section on "Positive Actions" for the Public Authorities (paragraph 1) reads as follows: *"In order to give effect to the constitutional right to equality, specific measures shall be adopted in favor of women to correct situations of patent inequality with respect to men. Such measures, which shall be applicable as long as such situations persist, shall be reasonable and proportionate in relation to the objective pursued in each case"*.

In paragraph 2 of the same Article 11, the line of "Positive Actions" is extended to the private world by stating textually: *"Private individuals and legal entities may also adopt this type of measures under the terms established in this Law"*.

Once the identification of inequalities has been carried out and according to the results obtained in each area of analysis, we proceed to the development of the POSITIVE ACTIONS that articulate the Equality Plan of FUNDACIÓN UNIVERSITARIA SAN PABLO CEU and with this will ensure compliance with the strategic objective in the area of equality.

To facilitate the implementation, monitoring and evaluation of each of the proposed positive actions, descriptive sheets have been prepared for each of them, with the following content:

- **Positive action code:** To identify the type of action and for relating the Positive Action Planning framework with the different development sheets for each action
 - **Positive Action:** Denomination of the Action and is described as follows the positive action to be taken.
 - **Person/s** **Target(s):** identification of the person(s) to whom it is addressed.
 - **Person(s) in charge:** A person in charge is assigned to the compliance with each Positive Action in order to integrate the Gender Equality Plan throughout the organization.
 - **Material resources:** those necessary to guarantee the quality of the action will either be executed or its allocation will be guaranteed.
 - **Communication:** communication channel is identified.
 - **Indicators:** which make it possible to monitor each one of the proposed actions, allowing monitoring at three levels:
 - results: it allows us to know the degree of execution, the degree of fulfillment of the objectives of each action, therefore, of the specific objectives agreed upon and of the general objective.
 - Process: whether the resources foreseen for the execution of each action have been available,
- monitoring of the planning and its management in case of deviations, unforeseen difficulties encountered.
- Impact: degree of correction of the indicators that established areas for improvement in the diagnosis of the situation, which makes it possible to demonstrate improvements achieved, elimination, reduction of inequalities, etc.
 - from presence/representation in each area of analysis.
- **Timing:** period of execution of the action.
 - **Economic valuation:** If possible, at least the following is established budget forecast necessary for the execution of the project.
 - **Control and follow-up:** the Gender Equality Commission is responsible.
- Other indicators will be incorporated for monitoring/evaluation of the action:
- **Degree of compliance of indicators:** establishing 3 levels.
 - **Results obtained:** description of the results.
 - **Date of execution:** actual date of execution
 - **Commission Minutes No.:** where the action has been followed up.

AP1: ORGANIZATIONAL SCOPE AND COMMITMENT TO EQUALITY

AFFIRMATIVE ACTION CODE: A.P.1.1

POSITIVE ACTION: Update the Gender Equality Policy document.

DEVELOPMENT AND ACTION PLAN:

The organization's GENDER EQUALITY POLICY will be reviewed for updating. This document should include the basic general principles related to the strategy that the organization wants to follow for the creation of a corporate culture where the principles of equality and equity are present and inspire and organize all its actions, among others.

Target people	All staff
Person(s) in charge	Organizational Management / People Management
Coordinates	Equality Agent
Material resources	Those necessary to carry out the action
Communication	Usual channels of the organization. It is recommended to publicize This policy should be made available to all staff. It is recommended that the policy be posted in the organization's work centers.
Indicators (disaggregated by sex where applicable)	<ul style="list-style-type: none"> - Equality Policy Register signed by management - Scope of the Equality Policy. - Policy perception records.
Timing	Schedule under development
Control and monitoring	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance with indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

AFFIRMATIVE ACTION CODE: A.P.1.2

POSITIVE ACTION: Verify the existence of the Equality Commission (EC) and its functioning.

DEVELOPMENT AND ACTION PLAN:

Verify the existence of the constitution of the GENDER EQUALITY COMMISSION, through the minutes of constitution of the Commission indicating its competencies and regulating or establishing the development of the operating regulations.
The staff should be aware of its constitution and purpose.
The Gender Equality Commission shall have a spokesperson, who is recommended to be the Equality Agent, so that he/she can inform the Management of the progress of the negotiations and the implementation of the Plan.
It will hold periodical meetings and its main objective will be to ensure the correct implementation of the Gender Equality Plan, as well as to attend to the different needs of the workers on the subject.

Target people	Gender Equality Commission / Agent		
Person responsible	Gender Equality Commission / People Management		
Coordinates	Equality Agent		
Material resources	Those necessary to carry out the action		
Communication	The constitution of the Commission shall be communicated through the support for the EC to decide the entire workforce.		
Indicators (disaggregated by gender where applicable) relevant)	<ul style="list-style-type: none"> - Minutes of the constitution of the Gender Equality Commission. - Operating regulations - Record of Minutes of the Gender Equality Commission in relation to the one established in the operating regulations. 		
Timing	Schedule under development		
Control and follow-up	Gender Equality Commission		
Evaluation and Follow-up			
Degree of compliance indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.1.3

POSITIVE ACTION: Verify the existence of the EC's operating regulations.

DEVELOPMENT AND ACTION PLAN:

Verify the existence of operating regulations where all the necessary aspects are developed to guarantee the functions assigned to it.

Persons addressees	Gender Equality Commission / Agent		
Person responsible	Gender Equality Commission / People Management		
Coordinates	Equality Agent		
Material resources	Those necessary to carry out the action		
Communication	The existence of the regulations will be communicated to the Commission together with the Constitution of the same to the entire staff.		
Indicators (disaggregated by sex where applicable)	<ul style="list-style-type: none"> - Operating regulations - Record of Minutes of the Gender Equality Commission in relation to the one established in the operating regulations. - No. of communications made - Communication channels used - 100% of the workforce must receive the communication 		
Timing	Schedule under development		
Control and monitoring	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.1.4

POSITIVE ACTION: Verify accredited training in equal opportunities for members of the E.C.

DEVELOPMENT AND ACTION PLAN:

It consists of each member of the E.C. accrediting the training in the subject performed. In case they do not have it, they must be trained to guarantee the exercise of their functions.

Target people	Gender Equality Commission		
Person(s) in charge	Gender Equality Commission / People Management		
Coordinates	Equality Agent		
Material resources	Those necessary to carry out the action		
Communication	Not applicable		
Indicators (disaggregated by sex where applicable) relevant)	<ul style="list-style-type: none"> - Pre-registration of accreditation for each member - Registration of non-accreditation and training need to be covered - Accreditation obtained in the training 		
Timing	Schedule under development		
Control and follow-up	Equality Agent		
Evaluation and follow-up			
Degree of compliance with indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.1.5

POSITIVE ACTION: Verify Equality Officer designation

DEVELOPMENT AND ACTION PLAN:

There must be an Equality Agent profile in charge of leading the whole process of integration and implementation of the principle of equality in the organization.

The person is appointed by the Management of the organization, by means of an appointment/designation and acceptance act.

Target people	Equality Agent
Person(s) in charge	Gender Equality Commission / People Management
Coordinates	People Management
Material resources	Those necessary to carry out the action
Communication	The existence of this profile will be communicated to the entire staff.
Indicators (disaggregated by sex where applicable) relevant)	<ul style="list-style-type: none"> - Record of Appointment - No. of communications made - Communication channels used - 100% of the workforce must receive the communication
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance with indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.1.6

POSITIVE ACTION: Verify the accredited training as Equality Agent of the person designated as such.

DEVELOPMENT AND ACTION PLAN:

It consists of accrediting by the designated and appointed person the training in the subject performed. In the absence of such training, he/she must undergo the specialized training required for the performance of the duties entrusted to him/her.

Target people	Equality Agent
Person(s) in charge	People Management
Coordinates	People Management / Gender Equality Commission
Material resources	Those necessary to carry out the action
Communication	Not applicable
Indicators (disaggregated by sex where applicable) relevant)	<ul style="list-style-type: none"> - Registration prior of accreditation at training specialization training - Registration of non-accreditation and training need to be covered
Timing	Schedule under development
Control and follow-up	Gender Equality Commission / People Management
Evaluation and follow-up	
Degree of compliance with indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.1.7

POSITIVE ACTION: Verify the accredited training in Gender Violence of the person designated as Equality Agent.

DEVELOPMENT AND ACTION PLAN:

It consists of accrediting by the designated and appointed person the training in the subject performed. In case of not having it, he/she must carry out the necessary training to develop the functions entrusted to him/her.

Taregt people	Equality Agent
Person responsible	People Management
Coordinates	People Management / Gender Equality Commission
Material resources	Those necessary to carry out the action
Communication	Not applicable
Indicators (disaggregated by sex where applicable) relevant)	<ul style="list-style-type: none"> - Registration prior of accreditation at training specialization training - Registration of non-accreditation and training need to be covered - Accreditation of training in VG.
Timing	Schedule under development
Control and follow-up	Gender Equality Commission / People Management
Evaluation and follow-up	
Degree of compliance indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.1.8

POSITIVE ACTION: Verify the accredited training as Expert in Harassment Conflicts of the person designated as Equality Agent.

DEVELOPMENT AND ACTION PLAN:

It consists of accrediting by the appointed person the training in the subject performed. In case of not having it, he/she must carry out the necessary training to enable him/her to carry out the functions entrusted to him/her.

Target people	Equality Agent
Person responsible	People Management
Coordinates	People Management / Gender Equality Commission
Material resources	Those necessary to carry out the action
Communication	Not applicable
Indicators (disaggregated by sex where applicable) relevant)	<ul style="list-style-type: none"> - Registration prior of accreditation at training specialization training - Registration of non-accreditation and training need to be covered
Timing	Schedule under development
Control and tracking	Gender Equality Commission / People Management
Evaluation and follow-up	
Degree of compliance indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

AFFIRMATIVE ACTION CODE: A.P.1.9

POSITIVE ACTION: Registration of the Gender Equality Plan in the Register of Equality Plans/Conventions.

DEVELOPMENT AND ACTION PLAN:

The Gender Equality Commission shall assign the person to whom it delegates the mission of registering the Equality Plan and all the necessary documentation for this purpose, in accordance with the criteria established by the regulations in force regarding registration, registration and publication of Equality Plans at both Autonomous Community and state level (as established in the development of the Regulation of RDL 6/2019, of March 1, on urgent measures to guarantee equal treatment and opportunities between women and men in employment and occupation).

This record shall be communicated to all personnel.

Target people	All staff		
Person responsible	Person designated by the Gender Equality Commission		
Coordinates	Gender Equality Commission		
Material resources	Those necessary to carry out the action		
Communication	It will be communicated to the entire workforce in a format agreed upon by the Gender Equality Commission.		
Indicators	<ul style="list-style-type: none"> - Approval of registration in the registry and delegation to the person responsible for it. - Proof of registration of the organization's Equality Plan - Proof of approval of registration 		
Timing	Schedule under development		
Control and follow-up	Gender Equality Commission.		
Evaluation and follow-up			
Degree of compliance indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.1.10

POSITIVE ACTION: Develop a procedure for the coordination of business activities based on the Equality Plan and the Protocol for Sexual Harassment and Harassment based on sex in the organization.

DEVELOPMENT AND ACTION PLAN:

The main objective of this measure will be to ensure that both customers and suppliers comply with basic equality regulations without violating the rights of male and female workers.

Target people	All staff
Person responsible	Gender Equality Commission
Coordinates	Equality Agent
Material resources	Those necessary to carry out the action
Communication	It will be communicated to the entire workforce together with the informative brochure or similar.
Indicators	- Registers specific of coordination of business activities.
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.1.11

POSITIVE ACTION: Establish an annual budget that allows compliance with the Gender Equality Plan.

DEVELOPMENT AND ACTION PLAN:

The Gender Equality Plan must have a budget adapted to its needs. For this purpose, a budget allocation should be foreseen, by means of the communication to the corresponding departments, which will allow the fulfillment of the positive actions foreseen in this Gender Equality Plan.

Target people	Gender Equality Commission / Equality Agent		
Person(s) in charge	Finance Department /General Management		
Coordinates	Equality Agent		
Material resources	Those necessary to carry out the action		
Communication	It will be communicated to the entire workforce as established by the Gender Equality Commission.		
Indicators	-Annual budget allocation in writing and recorded in the minutes.		
Timing	Schedule under development		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance with indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.1.12

POSITIVE ACTION: Activation of the legal requirements protocol

DEVELOPMENT AND ACTION PLAN:

A specific protocol will be prepared to cover the integration of all the legal requirements that may arise during the term of the plan, in order to convene the Gender Equality Commission to assess the effect of the new regulations on this Plan.

Target people	Gender Equality Commission / People Management		
Person(s) in charge	Equality Agent		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators	<ul style="list-style-type: none"> - No. of meetings convened - No. of legal texts incorporated 		
Timing	Schedule under development		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance with indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.1.13

POSITIVE ACTION: Communication and review of the Code of Conduct

DEVELOPMENT AND ACTION PLAN:

Ensure the dissemination of the code of conduct to the entire staff of Fundación Universitaria San Pablo CEU so that all personnel are aware of it and specifically of the content of Equality that it contains.

Target people	All staff
Person responsible	Gender Equality Commission / Agent
Coordinates	Equality Agent
Material resources	Those necessary to carry out the action
Communication	As agreed by the Gender Equality Commission
Indicators	<ul style="list-style-type: none"> - Identification of revised texts - Registration of the Code of Conduct integrating the principle of equal opportunities and treatment
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

**AP2: ACCESS TO EMPLOYMENT
MEASURE: SELECTION AND
RECRUITMENT**

AFFIRMATIVE ACTION CODE: A.P.2.1

POSITIVE ACTION: Analysis of the access process to ensure equal treatment and opportunities in selection and hiring.

DEVELOPMENT AND ACTION PLAN:

It is recommended to deepen all internal and external access/selection procedures to detect and correct possible gender biases, in:

- Channels for disseminating offers, ensuring that they are accessible to anyone who might be interested.

Job description and applications to fill vacancies: requirements, skills, abilities, experience, eliminating those that could contribute to the underrepresentation or non-presence of the underrepresented gender.

- Selection interviews: interview scripts, eliminating questions that could contribute to penalize gender stereotypes or roles, linked to gender diversity factors, age, origin, religion, sexual orientation...

Target people	All staff
Person responsible	People Management / internal communication
Coordinates	Equality Agent
Material resources	Those necessary to carry out the action
Communication	Not applicable.
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - No. of applications disaggregated by gender. - No. of applications that pass to the final phase. - No. of rejected applications disaggregated by sex and reasons for rejection.
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

**AP3: CLASSIFICATION, PROFESSIONAL
PROMOTION AND TRAINING ACTIONS**

AFFIRMATIVE ACTION CODE: A.P.3.

POSITIVE ACTION: Establish indicators of presence/representativeness of women and men.

DEVELOPMENT AND ACTION PLAN:

It is recommended that indicators be established to provide the percentage of men and women by professional category.

Target people	All staff
Person responsible	People Management / Equality Agent
Material resources	Those necessary to carry out the action
Communication	Usual channels of the organization
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - No. of qualitative indicators. - No. of quantitative indicators.
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

AFFIRMATIVE ACTION CODE: A.P.3.

POSITIVE ACTION: Establishment of training actions on equality and gender indicators in the design, implementation, dissemination, monitoring and evaluation of training.

DEVELOPMENT AND ACTION PLAN:

Training actions will be included in the area of equality (awareness of the integration of the principle of equality and treatment in organizations).

To guarantee the training of 100% of the staff in equality in favor of their contribution as agents of change, for the creation of a work environment respectful of equal opportunities, thus contributing to the maintenance of a healthy and safe work environment.

It is recommended that training in equality be integrated into the strategy for welcoming new hires, along with the rest of the subjects that must be known and complied with by both the workers and the organization that hires them.

Target people	<ul style="list-style-type: none"> - Gender Equality Commission - People Management - Rest of staff
Person responsible	People Management / Equality Agent
Material resources	Those necessary to carry out the action
Communication	Usual channels of the organization to ensure participation of 100% of the workforce
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Number of training actions carried out - Equality training actions carried out - % staff trained/year - % categories trained/year - % levels trained/year - No. of hours of training provided - Records of the same. - % or degree of decrease in the gender gap of representation in each of the areas diagnosed, with the purpose of at least approximating the existing representation in the workforce.
Timing	Schedule under development
Control and tracking	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance indicators	High Medium Low
Results obtained	

Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.3.3

POSITIVE ACTION: Equality awareness training action for the entire workforce.

DEVELOPMENT AND ACTION PLAN:

Initiate a training process for the entire workforce to contribute to the knowledge of equal opportunities and treatment in the workplace and how they can contribute to creating more egalitarian environments within the framework of integrating the principle of equality in the culture of the organization.

Target people	All staff
Person(s) in charge	People Management / Equality Agent
Material resources	Those necessary to carry out the action
Communication	Regular organizational channels to ensure 100% staff participation
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Number of training actions carried out - Equality training actions carried out - % staff trained/year - % categories trained/year - No. of hours of training provided - Records of the same.
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow- up	
Degree of compliance with indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.3.4

POSITIVE ACTION: Gender training action for the Gender Equality Commission.

DEVELOPMENT AND ACTION PLAN:

The objectives of this action, among others, are:

- To know basic concepts in equality/equity matters.
- Unconscious gender biases
- To understand and deepen the diversity factors.
- Benefits of mainstreaming the principle of equal treatment and equal opportunity
- Risks of non-integration of the principle of equal treatment and equal opportunity.

The aim is to advance in a better understanding of the individualities existing in society that contribute to generate an egalitarian environment.

Persons addressees	Equality and Middle Management Committee		
Person responsible	Gender Equality Commission /Directorate of People/Equality Officer		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - No. of people who have received the training - No. of records and signatures - No. of women and men who receive the training action - Record of accreditations obtained - Pre- and post-training perception of the need to integrate equality in people management. 		
Timing	Schedule under development		
Control and tracking	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

AP4: ACTIONS FOR EQUAL PAY

POSITIVE ACTION CODE: A.P.4.1

POSITIVE ACTION: Completion of the compensation register incorporating the levels resulting from the compensation audit.

DEVELOPMENT AND ACTION PLAN:

Preparation of the annual remuneration register following the results obtained in the job evaluation carried out in the Remuneration Audit. The register will take into account the valuation of the positions, the positions of equal value shown in the Audit, as well as the different professional categories, levels or positions, disaggregated by gender, as set forth in RD 902/2020.

Target people	HR/Monitoring Committee		
Person responsible	Equality Agent		
Coordinates	Equality Agent		
Material resources	Those necessary to carry out the action		
Communication	Usual company channels		
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Preparation of the remuneration register in accordance with the legislation, including the gap for all salary items or homogeneous groupings of items in: <ul style="list-style-type: none"> o Job category or position o Professional group o Audit levels o Equal value positions 		
Timing	Schedule under development		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.4.2

POSITIVE ACTION: Implementation of the SGI R-20 compensation management system.

DEVELOPMENT AND ACTION PLAN:

Implementation of the SGI R-20 compensation management system.

SGI R-20 is the second standard that belongs to the SGI standards whose main objective is to establish the guidelines for a correct management of Equal Pay in the company. This management system allows an organization to organize, manage and control equal pay for men and women in all areas of the company, improving the performance of the criteria of equality, parity and non-discrimination.

Target people	All staff
Person responsible	Gender Equality Commission and Agent.
Material resources	Those necessary to carry out the action
Communication	Usual channels of the organization
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Implementation of the management system - Internal audit of the management system External audit and SGI R-20 seal
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance with indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

**AP5: ACTION FOR THE EXERCISE OF THE
RIGHTS OF CONCILIATION OF PERSONAL,
FAMILY AND WORK LIFE**

POSITIVE ACTION CODE: A.P.5.1

POSITIVE ACTION: Develop a catalog of conciliation measures.

DEVELOPMENT AND ACTION PLAN:

A catalog of conciliation measures that the organization has implemented in accordance with the Workers' Statute, Collective Bargaining Agreement, Royal Decree Law 6/2019, urgent measures and those for improvement, will be prepared in order to facilitate the knowledge of the same to the entire workforce, in a proactive manner.

Target people	All staff
Person(s) in charge	Gender Equality Commission/ Equality Agent
Material resources	Those necessary to carry out the action
Communication	Usual channels of the organization
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Catalog of Conciliation Actions - Increase in requests with respect to the previous period
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance with indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.5.2

POSITIVE ACTION: Establish a system of indicators to monitor access to and use of conciliation actions.

DEVELOPMENT AND ACTION PLAN:

Indicators of request, access and use of measures by women and men, as well as of the actions, will be incorporated into the personnel database.

Target people	All staff
Person(s) in charge	Gender Equality Commission/ Agent
Material resources	Those necessary to carry out the action
Communication	Not applicable
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - No. of uses and type of action by women. - No. of uses and type of action by men. - Variation of percentages and actions based on the reality analyzed in the 2018 Situation Diagnosis Report. - Staff perception of its use and actions.
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance with indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.5.3

POSITIVE ACTION: Develop awareness and sensitization campaigns on family co-responsibility.

DESCRIPTION:

Development of campaigns, in coordination with the Communication Department, to increase the use of conciliation measures by men, specifically those related to the care of third parties, to be proposed by the Gender Equality Commission.

Target people	All staff		
Person(s) in charge	Gender Equality Commission / Agent / Communication		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - No. of campaigns carried out. - % or degree of increase in the number of uses and type of actions by men. 		
Timing	Schedule under development		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance with indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.5.4

POSITIVE ACTION: Commitment to seals and policies that favor professional and personal conciliation.

DESCRIPTION:

In accordance with trends in family and work reconciliation, external advice and certification systems to facilitate new policies.

Target people	People Management		
Person(s) in charge	Equality, Equality Agent and CSR Committee		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Attendance at training sessions on reconciliation trends - EFR Certificates 		
Timing	Schedule under development		
Control and follow-up	Equality Commission		
Evaluation and follow-up			
Degree of compliance with indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

**AP6: OCCUPATIONAL WORK HEALTH MEASURES
AND PREVENTION OF SEXUAL / GENDER-BASED
HARASSMENT**

POSITIVE ACTION CODE: A.P.6.1

POSITIVE ACTION: Conducting occupational risk assessment with a gender perspective.

DEVELOPMENT AND ACTION PLAN:

An evaluation of occupational risks with a gender perspective will be carried out and, depending on the results obtained in the planning of preventive measures, the necessary measures will be adopted.

The actions should include:

- How the Prevention Service should be informed of the situation of the pregnant, especially sensitive or breastfeeding worker and the position she occupies in order to determine whether the position entails risks of incompatibility with the worker.
- How the worker will be informed of the risks related to her job.
- Which technical personnel will review the worker's workstation to check whether it may pose a risk to the worker based on her special sensitivity.

If necessary, the work station shall be adapted or the person shall be changed if the risk involved cannot be minimized.

Target people	Personnel of the Occupational Risk Prevention Department		
Person responsible	Gender Equality Commission/Personnel Management/Department of PRL/Equality Officer		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators (disaggregated by sex where applicable)	<ul style="list-style-type: none"> - Review of the risk assessment of all jobs for women and men. - Accident rates (HF and PD) broken down by gender, department/unit, category, level. - Annual statistical report and improvement measures implemented. - % or degree of increase in the number of uses and type of measures by men. - No. of people informed and evaluated. - No. of pregnant women. 		
Timing	Schedule under development		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance indicators	High	Medium	Low
Results obtained			

Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.6.2

POSITIVE ACTION: Incorporate and communicate sexual harassment and harassment based on sex within the CEU's internal reporting channel.

DEVELOPMENT AND ACTION PLAN:

Disseminate among the entire staff the possibility of reporting situations of sexual harassment and harassment based on sex through the CEU's reporting channels.

Target people	All staff
Person(s) in charge	Gender Equality Commission and agent. Responsible for the CEU whistleblower channel
Material resources	Those necessary to carry out the action
Communication	Usual channels of the organization
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Number of persons to whom the procedure has been communicated. - No. of sexual harassment cases. - No. of cases of harassment based on sex. - No. of cases of harassment based on sex and sexual harassment.
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance with indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.6.3

POSITIVE ACTION: Revision of the harassment protocol, updating the part referring to sexual harassment and harassment based on sex.

DEVELOPMENT AND ACTION PLAN:

The procedure for the prevention and management of possible cases of sexual or gender-based harassment should be updated.

The complaint and resolution procedure is fundamental to the success of the anti-harassment policy. Two aspects that should be included and clarified are to whom and how the complaint should be presented and what are the rights and duties of both the alleged victim and the alleged harasser during the procedure.

It may also be possible to provide for the resolution of cases through an informal procedure, so that if the problem can be solved informally in the first instance through the confrontation of the parties or through an intermediary, it is not necessary to resort to the formal investigation procedure.

Investigations must be conducted with full respect for all parties and be independent and objective. A time limit should be established for the investigation, in order to avoid an excessively lengthy process and the impossibility of resorting to the legal system. It is convenient that the parties can appear in the investigations with someone they trust, that the investigation is carried out under a contradiction regime and that confidentiality is maintained.

Target people	The entire staff of the organization.
Person responsible	Gender Equality Commission / Agent.
Material resources	Those necessary to carry out the action
Communication	Usual channels of the organization
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Updating and availability of the Harassment Prevention Protocol. - No. of information requested disaggregated by gender. - No. of cases that have required the activation of the protocol. - No. of conclusion reports.
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	

Degree of compliance indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

**AP7: COMMUNICATION / USE OF
LANGUAGE ACTIONS**

POSITIVE ACTION CODE: A.P.7.1

POSITIVE ACTION: Dissemination of the Gender Equality Plan and Policy

DEVELOPMENT AND ACTION PLAN:

A communication will be prepared on the Gender Equality Plan which will include information on the actions to be carried out in the area of Equality.

This information must reach the entire workforce, and if it is valued, inform externally (customers, suppliers, etc.).

Target people	All staff
Person responsible	Communication/ Gender Equality Commission/ Agent
Coordinates	Gender Equality Commission
Material resources	Those necessary to carry out the action
Communication	Usual channels of the organization
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Communication through the usual channels - 100% of the workforce is informed of the existence of the Gender Equality Plan. - No. of suggestions received
Timing	Schedule under development
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.7.2

POSITIVE ACTION: Establishment of an Information Plan

DEVELOPMENT AND ACTION PLAN:

Ensure that information reaches all personnel in an appropriate manner by communicating the policies on Gender Equality.

Persons addressees	All staff		
Person responsible	Communication/Gender Equality Officer/Commission I		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators	<ul style="list-style-type: none"> - Communication channels used - No. of documents published 		
Timing	Schedule under development		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.7.3

POSITIVE ACTION: Elaboration of Good Practices Guide and Language

DEVELOPMENT AND ACTION PLAN:

A Guide of Good Practices should be developed as a manual on Equality. In this guide the concepts will be developed in detail the attitudes and preventive measures to be followed by the organization and its personnel.

It is recommended that the following topics be addressed in the Good Practice Guide:

- The organization's policy on equality.
- Basic positive actions.
- Examples of good practices
- Attitudes that are not accepted in the organization.
- Notification, composition and functions of the Gender Equality Commission.
- Equality Agent: functions and location.
- Use of non-sexist language

The Guide will be made available to all the organization's personnel in order to promote good practices at all levels.

Target people	All staff		
Person responsible	Communication/ Equality Agent/Gender Equality Commission		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Degree of reception of the people. - No. of suggestions received. - Degree of diffusion. 		
Timing	Schedule under development		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.7.4

POSITIVE ACTION: Creation/Revision of communication channels for staff (suggestion box or similar).

DEVELOPMENT AND ACTION PLAN:

Participation in the detection of cases or situations of inequality is very important, so it is recommended that a communication channel be established with the entire workforce, such as a suggestion box or similar tool.

The Suggestion Box should be reviewed periodically (at least every two weeks or at most monthly) in order to be able to respond to the proposals or cases detected, whether positively or not.

Persons addressees	All staff		
Person responsible	Gender Equality Commission, Equality Agent and People Management		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - No. of channels - No. of communications received and attended to 		
Timing	Schedule under development		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

AP8: MONITORING ACTIONS

POSITIVE ACTION CODE: A.P.8.1

POSITIVE ACTION: Training control

DEVELOPMENT AND ACTION PLAN:

It is recommended that indicators be established in the training procedure for subsequent follow-up and control, in order to ensure equal opportunities for men and women, both in terms of the types of courses given and the number of courses given.

Therefore, the indicators (always disaggregated by sex) that should be established for the follow-up and control of training activities should be quantitative (number of courses, number of hours, etc.) and qualitative (type of courses, cost of courses, etc.).

Target people	Staff on payroll		
Person responsible	Gender Equality Commission/ People Management/Equality Agent		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Minutes of the Gender Equality Commission. - Review of established indicators. - No. of technical courses with their participation. - No. of cross-cutting courses with their participation. 		
Timing	Annual.		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P.8.2

POSITIVE ACTION: Selection Control

DEVELOPMENT AND ACTION PLAN:

It is recommended that indicators be established in the selection procedure to ensure its transparency. For example, number of CVs received from men and women for the same position, as well as the final decision to hire (gender of the candidate), number of women and men hired in relation to the CVs received, etc.

Target people	Personnel in incorporation
Person(s) in charge	Gender Equality Commission / People Management / Equality Agent
Material resources	Those necessary to carry out the action
Communication	Usual channels of the organization
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - No. of women and men in the process - No. of resumes received, disaggregated by gender
Timing	Annual.
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance with indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.8.3

POSITIVE ACTION: Staff perception surveys

DEVELOPMENT AND ACTION PLAN:

An item will be included in the engagement survey addressed to all staff. The results will be analyzed taking into account the gender variable.

Target people	Staff on payroll
Person responsible	Gender Equality Commission/Equality Agent/Directorate of Equality/Direction of People/Communication
Material resources	Those necessary to carry out the action
Communication	Usual channels of the organization
Indicators (disaggregated by gender where applicable) relevant)	<ul style="list-style-type: none"> - Incorporation of the Equality item in the CEU Commitment survey. - Quantitative analysis of the item (overall and by sex) - Qualitative analysis through survey comments.
Timing	Biannual.
Control and follow-up	Gender Equality Commission
Evaluation and follow-up	
Degree of compliance indicators	High Medium Low
Results obtained	
Date of completion	
Commission minutes no.	

POSITIVE ACTION CODE: A.P.8.4

POSITIVE ACTION: Gender Equality Commission meetings

DEVELOPMENT AND ACTION PLAN:

The Equality Commission will meet periodically, as established in the operating regulations, to follow up the implementation of the Equality Plan, so that the meetings will review the positive actions and their implementation, planning and execution.

Target people	The entire staff of the organization		
Person(s) in charge	Gender Equality Commission/Equality Officer		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - Approval of the operating regulations of the Equality Commission. - Record of the Minutes of the Equality Commission. 		
Timing	Permanent. According to regulations		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance with indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

POSITIVE ACTION CODE: A.P 8.5

POSITIVE ACTION: Internal audits to monitor the Gender Equality Plan and compliance with regulations.

DEVELOPMENT AND ACTION PLAN:

Within the framework of the implementation of the Gender Equality Plan, to carry out internal audits with the periodicity determined by the Gender Equality Commission.

Target people	Gender Equality Commission / Equality Agent		
Person(s) in charge	Gender Equality Commission / People Management/Equality Agent		
Material resources	Those necessary to carry out the action		
Communication	Usual channels of the organization		
Indicators (disaggregated by gender where applicable)	<ul style="list-style-type: none"> - No. of audits performed. - Degree of implementation of positive actions. - Degree of execution of groups of measures. 		
Timing	Annual.		
Control and follow-up	Gender Equality Commission		
Evaluation and follow-up			
Degree of compliance with indicators	High	Medium	Low
Results obtained			
Date of completion			
Commission minutes no.			

8.- MONITORING AND EVALUATION

Article 46 of Law 3/2007, which regulates the concept and content of company equality plans, states that "Gender equality plans shall establish the specific equality objectives to be achieved, the strategies and practices to be adopted for their attainment, as well as the establishment of effective systems for monitoring and evaluating the objectives set".

An Gender Equality Plan is a dynamic project that requires constant revision and updating, for which it is undoubtedly necessary to organize the formulas and procedures for follow-up and evaluation in order to be able to maintain and improve it in the necessary aspects.

In Chapter I of "General Principles" of Title II of "Public Policies on Gender Equality" of Law 3/2007, some demands are made on the bodies of the Public Authorities that it is positive to take as a reference as a starting point to achieve a systematization in the collection of data on equality. There, in article 20 on "Adequacy of statistics and studies", some guidelines are established to guarantee the effective integration of equality in ordinary activities, and these are included for their interest and applicability to our equality plan:

- a) Systematically include the gender variable in the statistics, surveys and data collection they carry out.
- b) Establish and include in the statistical operations new indicators that allow for a better understanding of the differences in values, roles, situations, conditions, aspirations and needs of women and men, their

manifestation and interaction in the reality to be analyzed.

- c) To design and introduce the necessary indicators and mechanisms that allow knowledge of the incidence of other variables whose concurrence generates situations of multiple discrimination in the different areas of intervention.
- d) To carry out sufficiently large samples so that the various variables included can be exploited and analyzed according to the sex variable.
- e) Exploit the data available so that the different situations, conditions, aspirations and needs of women and men in the different areas of intervention can be known.
- f) Review and, if necessary, adapt existing statistical definitions in order to contribute to the recognition and valuation of women's work and avoid negative stereotyping of certain groups of women.

Monitoring and evaluation indicators

This Plan has been designed with a definition of objectives and indicators to ensure the process of monitoring the execution of processes, results and impact, and thus measure the degree of compliance and impact generated.

To emphasize that the indicators required by Royal Decree Law 6/2019, of March 1, 2019, on urgent measures to guarantee equal treatment and opportunities between women and men in employment and the

occupation, Law 9/2017 of November 8, on Public Sector Contracts, such as the indicators established by Law 11/2018 on non-financial information and diversity relating to the social impacts of companies (social and personnel-related issues, social relations, human rights and society) in line with the Global Reporting Initiative (GRI).

The Plan's monitoring and evaluation system will involve the preparation of:

- Annual monitoring report
 - Final report (at the end of the Plan)
- Establishing a deadline period of 2 months after the end of the year for the issuance of these reports.

The persons responsible for the follow-up and evaluation will be those who form the Gender Equality Commission and will be in coordination with the Equality Agent responsible for the development of the Equality Plan in the organization.

9.- EQUALITY AND NEGOTIATING AGENT COMMITTEE

The company will designate the figure of **Equality Agent**, formalized in the act of designation, whose role will be to assume the functions of coordination and supervision of the process of elaboration of the Gender Equality Plan (in all its phases: commitment, diagnosis, design, implementation and follow-up), and, in general, of the company's equality policies. Besides supporting, advising and contributing to the training of the Gender Equality Commission and/or the work team. Therefore, he/she must have the necessary accredited training to do so.

The **Negotiating Committee** is the joint structure (Company and RLT) referent for the negotiation process of this Gender Equality Plan. FUNDACIÓN UNIVERSITARIA SAN PABLO CEU has RLT in all its centers, so, following the RD 901/2020, this negotiation has been carried out through the formation of a Negotiating Committee formed by:

Company Representative:

José María Buendía Fernández de Velasco
José María Pando Echevarría
Óscar cortijo Peris
José Luis Martínez Soria
Ricardo Torroba Pérez
José Luis Herráiz Bañares

Corporate Representative:

Carmen Palomo Pinel
Javier Sánchez Millán
Monsterrat Rúa Fernández
Elba Diana Campanero González
María Soledad Abollado Rubio
Carmen Hernández Carrilero
Nekane Altuna Sánchez
Luz María Pire Galiana
Anna Colomar Savall
Orlando Rodríguez Martín

Likewise, the **Monitoring Committee** is the body in charge of monitoring, implementing the Gender Equality Plan and integrating equality in the company designated for this purpose by the Negotiating Committee. That is why it is essential that the staff is aware of its existence and composition so that they can communicate the needs and suggestions that may arise throughout the process.

Members of the Monitoring Committee

Company Representative:

José María Buendía Fernández de Velasco
José María Pando Echevarría
Óscar Cortijo Peris
José Luis Martínez Soria
Ricardo Torroba Pérez
José Luis Herráiz Bañares

Corporate

Representative:

Carmen Palomo Pinel
Javier Sánchez Millán
Monsterrat Rúa Fernández
Elba Diana Campanero González
María Soledad Abollado Rubio
Carmen Hernández Carrilero
Nekane Altuna Sánchez
Luz María Pire Galiana
Anna Colomar Savall
Orlando Rodríguez Martín

Objective of the Monitoring Committee:

To monitor compliance with the agreed Gender Equality Plan and evaluate its impact on improving equality in the company.

The functions of the Monitoring Committee:

- Promote the dissemination of the Gender Equality Plan.
- To monitor possible discrimination, both direct and indirect, to ensure the application of the principle of equality.
- Raise staff awareness of the importance of incorporating equal opportunities.
- Ensure the implementation of all actions planned to achieve the general objective of the Gender Equality Plan.
- Interpreting the Gender Equality Plan
- To know the possible incidences derived from the application and their resolution.

- Incorporate those indicators not included in the initial diagnosis to improve knowledge of the situation, and based on this, propose, if appropriate, the implementation of positive actions to respond to the conclusions derived from the results of these indicators.
- Receive information from the departments in charge of their implementation, of all the established follow-up indicators disaggregated by sex, for their subsequent interpretation from a gender perspective. Receive an annual update of the diagnosis of the situation, in order to know the evolution of the indicators, and thus the impact that may be caused by the implementation of the measures.
- To prepare an annual monitoring report on the Gender Equality Plan.

10.- GLOSSARY OF TERMS

- **Sex:** set of physical, biological and bodily characteristics with which a people are born, they are natural.
 - **Gender:** Social roles, behaviors, activities, and attributions constructed that a particular society considers women's or men's characteristics. Historical, modifiable characteristics that are transformed with and over time. It establishes the discrimination between "Feminine" and "Masculine".
 - **Equal Opportunity:** a right and principle that implies that all human beings must have the same rights and the same opportunities regardless of sex, culture, religion, etc., to achieve the same conditions of life on a personal and social level.
 - **Formal Equality:** when the legal basis establishes the equality of rights, but this equality is not reflected in reality. It is a prerequisite for the development of real equality.
 - **Real Equality:** the implementation of the necessary measures to ensure that the equality is effective, removing both cultural and any other type of obstacles that hinder its achievement.
 - **Gender Equality:** considers and values equally the different
- The behavior, aspirations and needs of both women and men, without the intervention of gender roles and stereotypes assigned on the basis of the sex to which one belongs.
- **Gender equity:** fairness in the distribution of goods and resources, is the means to achieve gender equality (it is the result it aims to achieve).
 - **Prejudice:** Value judgment, opinions about something that is not known or is poorly known, usually unfavorable.
 - **Gender role:** set of roles, tasks and/or trades and expectations culturally ascribed to women and men. They are the cause/origin of stereotypes.
 - **Gender Stereotyping:** about what should be personal attributes of women and men women and men (traits, attitudes or behaviors behavior (traits, attitudes or behaviors that are clearly different for each gender).
 - **Sexism:** cultural tendency to consider one gender as superior to the other and to behave according to this idea. It translates into discrimination of one gender against the other and also into privileges of one sex over the other.

- **Presence or balanced composition:**
balanced composition of women and men in such a way that, in the group to which it refers, the number of persons of each sex does not exceed 60% and is not less than 40%.
- **Occupational segregation:**
Caused by the social division of the gender-based work is the disproportionate concentration of women in certain sectors and jobs and of men in others.
 - **Horizontal segregation:** by productive activity/sector, it is the majority presence of women or men in a given sector of activity, professions, trades, jobs.
 - **Vertical segregation:** by professional category, it is the difference in the presence of women and men as one moves up the organizational hierarchy.
- **Glass ceiling:** invisible barrier, describes the specific moment in a woman's professional career, in which, instead of growing due to her education and experience, she stagnates within a labor structure, trade or sector. Difficulty of access to positions of responsibility.
- **Reconciliation:** maintaining a balance in the different dimensions of life in order to improve well-being, health and work capacity.
- **Co-responsibility:** sharing responsibility, achieving the involvement of people in the sharing of domestic and family responsibilities.
- **Feminization index:** the ratio between the number of women and the number of men.
- **Gender Gap:** refers to the difference/distance between the rates or percentages of females and males in the areas of analysis, in our case distance of participation/presence of women in each area.
- **Gender-based violence:** ³any violence against a woman because she is a woman or because it disproportionately affects women.

² First additional provision. Balanced presence or composition. Organic Law 3/2007, of March 22, for the effective equality of women and men.

³ Instrument of ratification of the Council of Europe Convention on preventing and combating violence against women and domestic violence, done at Istanbul on May 11, 2011. BOE June 6, 2014

Actions	Year 2022/2023 (since March)	Year 2023/2024		Year 2024/2025		Year 2025/2026		Year 2026/2027 (until March)
A.P.1.1.1.- To update the document on Gender Equality Policy	x							
A.P.1.2.2.- To verify the existence of the Gender Equality Commission (E.C.) and its functioning.	x							
AP.1.3.- To verify the existence of the E.C. Functioning Rules.	x							
A.P.1.4.- To verify accredited training in terms of equal opportunities for people members of the E.C.	x							
A.P.1.5.- To verify Equality Agent designation	x							
A.P.1.6.- To verify accredited training as a person's Equality Agent designated as such.	x							
A.P.1.7.- To verify accredited training in Gender Violence of the person designated as A.I.	x							
A.P.1.8.- To verify accredited training as Expert in Harassment Conflicts of the person designated as A.I.	x							
A.P.1.9.- Enrollment of the Gender Equality Plan in the Registry of Equality Plans/Conventions.	x							
A.P.10.-To develop a procedure of coordination of activities that has as its main point of focus the Gender Equality Plan itself and the Sexual Harassment and Gender-based Harassment Prevention Protocol between companies.	x							
A.P.1.11.- To establish a budget for the area of Equality of the organization that compliance with the Gender Equality Plan.	x							
A.P.1.12.- To activate the legal requirements protocol.	x							
AP.1.13.- Communication and review of the Code of Conduct.	x							
A.P.2.1- Analysis of the access process to ensure equal treatment and opportunities in selection and hiring.	x							
A.P.3.1.1.- Establish indicators of presence/representativeness of women and men	x							

A.P.3.2.- Establishment of actions and gender indicators in the design implementation, dissemination monitoring and evaluation of the training.	x							
A.P.3.3.3.- Equality awareness training action for the entire workforce.			x					
A.P.3.4.- Gender Training Action for the Gender Equality Commission.							x	
A.P.4.1. Completion of the compensation register incorporating the levels resulting from the compensation audit.				x				
A.P. 4.2.- Implementation of the SGI R-20 compensation management system.						x		
A.P.5.1.- To prepare a catalog of conciliation measures.	x							
A.P.5.2.2.- Establish a system of indicators for monitoring access to and use of work-life balance measures.			x					
A.P.5.3.- Develop campaigns of awareness and sensitization on family co-responsibility.				x				
A.P.5.4.- Commitment with seals and policies that favor the reconciliation of professional and personal life						x		
A.P.6.1.- Performance of the assessment of occupational hazards with a gender perspective.			x					
A.P.6.2.-Incorporate and communicate the sexual harassment and harassment based on sex within CEU's internal complaint channel.	x							
A.P.6.3.- Revision of the harassment protocol, updating the part referring to sexual harassment and harassment based on sex.	x							
A.P.7.1.1.- Dissemination of the Policy on Equality and the Gender Equality Plan.	x							
A.P.7.2.- Establishment of an Information Plan.	x							
A.P.7.3.- Elaboration of Good Practices Guide and language.					x			
A.P.7.4.- Creation/Revision of communication channels for the staff (Suggestion box or similar).	x							
A.P 8.1.- Training control	x		x		x		x	
A.P.8.2.- Selection Control	x		x		x		x	
A.P.8.3.- Staff perception surveys						x		

A.P.8.4.- Meetings of the Gender Equality Commission	x		X		X		X	X
A.P.8.5. Audits audits of monitoring of the equality plan and regulatory compliance.							X	X

Signed Gender Equality Commission:

Madrid, to of of 2023